

PROPOSED AMENDMENT TO THE STCW CODE COLOUR VISION REQUIREMENTS

**Comments on the Proposed Amendment to the STCW Code
Colour Vision Requirements**

Submitted by the International Shipping Federation (ISF)

SUMMARY

<i>Executive summary:</i>	This document comments on STW 44/18 and draws the attention of the Sub-Committee to concerns of the International Shipping Federation with regard to the suggested revision of the STCW colour vision requirements.
<i>Strategic direction:</i>	5.2
<i>High-level action:</i>	5.2.2
<i>Planned output:</i>	5.2.2.11
<i>Action to be taken:</i>	Paragraph 8
<i>Related documents:</i>	STW 44/18

Introduction

1. This submission is in accordance with document MSCMEPC.1/Circ.4/Rev 2 and the provisions of paragraph 6.12.5 of the Guidelines and comments on document STW 44/18 by drawing the attention of the Sub-Committee to concerns of the International Shipping Federation with regard to the suggested revision of the STCW colour vision requirements.

Colour Vision Requirements

2. This document also draws the attention of the Committee to the report resulting from STW43 regarding the suggested revision of the STCW colour vision requirements. It is noted that ISF pointed out at the meeting that as there had been no advance warning it was important to seek the view of Maritime Medics. It was agreed to defer decision on potential changes until STW 44 to give an opportunity for those most affected to be consulted.

3. ISF recognises that in order for the STCW Convention to be effective it is essential for Parties to the Convention to have the necessary tools to ensure appropriate pre-employment medicals are conducted.
4. ISF has now had the opportunity to consult with doctors who were actively involved in the recent IMO/ ILO revision process for Medical Examinations. Medical advice is that it would be better to maintain the current standards and to wait until a screen based test is available which is considered the optimal solution. This view is supported by IMHA- the International Maritime Health Association.
5. ISF has been advised that it is highly unlikely that seafarers would be found unfit for watch keeping duties in the countries that do not have facilities to conduct lantern testing.

Action requested of the Committee

6. The Sub-Committee is invited to note the concerns expressed above and to consider maintaining the current testing process until a screen based test becomes available.