

**DEVELOPMENT OF GUIDANCE FOR THE IMPLEMENTATION OF THE
2010 MANILA AMENDMENTS**

**Consideration of a "grace period" with respect to port Control enforcement of STCW
Regulation VI/6.**

**Submitted by The International Chamber of Shipping and The International Shipping
Federation.**

SUMMARY

<i>Executive summary:</i>	This document highlights concerns regarding the issuance to seafarers by Parties of certificates of proficiency as required by STCW Regulation VI/6 (Mandatory minimum requirements for security-related instruction for all seafarers), and suggests that the Sub-Committee might give consideration to the possibility of an extended "grace period" with respect to PSC enforcement of the new certification required under STCW 2010.
<i>Strategic direction:</i>	5.2
<i>High-level action:</i>	5.2.2
<i>Planned output:</i>	5.2.2.5
<i>Action to be taken:</i>	Paragraph 7
<i>Related documents:</i>	STCW.7/Circ.12

Introduction

1. This document is submitted in accordance with paragraph 6.12.5 of the Guidelines on the Organization and method of work of the Maritime Safety Committee and the Marine Environmental Protection Committee and their subsidiary bodies (MSC-MEPC.1/Circ.4).
2. STCW 2010, Regulation VI/6, stipulates mandatory minimum requirements for security-related instruction for all seafarers, which, where relevant, require certificates of proficiency to be issued to seafarers from 1 January 2014. ICS and ISF have gone to great lengths to advise shipping companies of the transitional measures for these new requirements, as set out in Section A-VI/6, which are different to those concerning the transitional measures that apply to other changes introduced by STCW 2010.
3. ICS and ISF are concerned that any certification required to be issued by Parties to the 2010 Manila Amendments might not be fully in place to meet the requirements of STCW Regulation VI/6 from 1 January 2014, as required by Section A-VI/6. By the time that HTW1

convenes the 1 January deadline will have passed, but there is still a concern that certificate issuing obligations may not have been fully met by all Parties and that ships may potentially encounter difficulties during port State control inspections.

4. ICS and ISF also understand that the training and familiarization required by Regulation VI/6 has only just recently been approved by certain Parties (whilst other Parties may not yet even have these arrangements in place). This presents serious difficulties for Companies that need to ensure that the seafarers they employ are trained and certificated as required by STCW 2010.

5. The Sub-Committee will recall that in 2002 the Organization issued STCW.7/Circ.12 when it became clear that many Parties could not meet the deadline to comply fully with some of the STCW 1995 amendments.

6. With respect to Regulation VI/6, it is understood that a number of Parties have already put transitional arrangements in place for a further six month period. However, in view of the potential difficulties that might be experienced by ships during port State control inspections, the Sub-Committee might wish to give consideration to the possibility of an extended "grace period" with respect to PSC enforcement of the new certification required by Regulation VI/6 .

Action requested of the Sub-Committee

7. The Sub-Committee is requested to consider the remarks above and to take action as appropriate.