

## REVIEW OF STCW PASSENGER SHIP SPECIFIC SAFETY TRAINING

### Comments on the report of the correspondence group

Submitted by International Chamber of Shipping (ICS), Cruise Lines International Association (CLIA) and INTERFERRY

#### SUMMARY

<i>Executive summary:</i>	This document comments on the outcome of the work of the correspondence group on the review and revision of passenger ship specific training within the STCW Convention and Code (HTW 2/10/1).
<i>Strategic direction:</i>	5.2
<i>High-level action:</i>	5.2.2
<i>Planned output:</i>	5.2.2.2
<i>Action to be taken:</i>	Paragraph 18
<i>Related documents:</i>	HTW 1/13; HTW 1/13/Corr.1; HTW 1/13/1; HTW 1/21

#### Introduction

1 This document comments on the report of the correspondence group tasked with preparing draft amendments to chapter V of the STCW Convention and Code, providing revised special training requirements for passenger ship specific training (HTW 2/10/1). It is submitted in accordance with the provisions of paragraph 6.12.5 of the *Guidelines on the organization and method of work of the Committees and their subsidiary bodies* (MSC-MEPC.1/Circ.4/Rev.3).

2 The co-sponsors propose an approach to the revision of special training requirements for personnel serving on board passenger ships that will improve the safety of passengers and personnel.

#### Discussion

3 It is evident that well-drafted and comprehensive training proposals could clarify the training requirements to the benefit of passenger ship safety and all stakeholders. The co-sponsors approached the review of passenger ship specific safety training aware of the following four principles:

- .1 The proposed amendments should reflect the diversity of passenger ships and recognize the differing implications the amendments may have for the different ship types;

- .2 The proposed amendments should be clearly defined and appropriate to the differing capacities, duties, and responsibilities of personnel on board all passenger ships;
- .3 The proposed amendments should not duplicate existing training in the STCW Convention and Code, nor conflict with the provisions of other IMO instruments; and
- .4 Any new training requirements should be based on a demonstrated compelling need related to passenger ship safety.

4 There are many different types of passenger ships, each having many and varying roles for personnel on board. The co-sponsors consider it essential to ensure that the scope of application of training and familiarization requirements is clear and precise. Clearly defined applicability can ensure that the correct persons receive the correct training and familiarization in accordance with their capacity, duties and responsibilities.

5 With regards to the structure of the proposed amendments, the co-sponsors recall that competency tables are generally employed in section A of STCW Code where training is to be approved by the flag State with a corresponding certificate to be issued by that State. However, other types of training, that are not required to be approved by the flag State, or specific training that may be carried out on board, or shipboard familiarization, do not require the development of competency tables. Therefore, it would be inconsistent with the STCW Code to develop competency tables where they are not required in these proposed amendments. The STCW Code also includes lists of "abilities" which serve to provide flexibility. The co-sponsors therefore suggest that:

- .1 A competency table should only be included in section A of the STCW Code to provide detail where the training will culminate in a certificate issued by the flag State; and
- .2 "Abilities" set out in lists in section A of the STCW Code should be used for all other types of training and familiarization to provide detail of their components.

6 STCW Regulation V/2, paragraph 2, states that "*prior to being assigned shipboard duties on board passenger ships, seafarers shall have completed the training required [...] in accordance with their capacity, duties and responsibilities*". However, on passenger ships, it may be logistically difficult to determine and conduct the appropriate training and familiarization for certain personnel as all of their emergency duties and responsibilities may have not been assigned prior to their arrival to the ship. The co-sponsors suggest that a lack of flexibility could hinder efforts to ensure that personnel are sufficiently trained and familiarized.

7 The correspondence group agreed that shipboard familiarization was acceptable and appropriate for the basic level of training for passenger ships. Consequently, STCW regulation V/2, paragraph 2, requires amending to allow flexibility for the timing of each of the training levels. The co-sponsors consider that:

- .1 Personnel should be trained and familiarized in accordance with their capacity, duties, and responsibilities, and as appropriate to their actual responsibilities related to passengers in an emergency situation; and

- .2 A shipboard emergency and the requisite response is, by definition, ship specific, and consequently some shipboard familiarization and on board training is necessary.

8 The co-sponsors consider that the number of personnel on some passenger ships warrants the development of transitional provisions or interim guidance to support the amendments. It will be important to allow all stakeholders a sufficient period of time to make the necessary arrangements for any new requirements.

### **Proposal**

9 In light of the principles and clarifications above, the co-sponsors propose the following approach to the special training requirements in the STCW Convention and Code for personnel on passenger ships.

#### *Passenger ship emergency familiarization*

10 The co-sponsors consider this to be the basic level for applicable personnel serving on board passenger ships in accordance with their capacity, duties, and responsibilities. It should be carried out as shipboard familiarization. Documentary evidence of the familiarization should be recorded by the company with electronic records\* being considered acceptable.

11 Care should be taken to ensure that the abilities to be listed in section A-V/2 for passenger ship emergency familiarization do not duplicate the abilities listed under safety familiarization training (section A-VI/1, paragraph 1) and, as applicable, certain components of basic training (section A-VI/1, paragraph 2). Furthermore, the abilities should only address passenger ship specific "gaps". Abilities for inclusion in passenger ship emergency familiarization should be listed in the format currently found in section A-V/2, paragraph 2, and amended as appropriate.

#### *Passenger ship crowd management training*

12 The co-sponsors consider passenger ship crowd management to be applicable to personnel assigned duties on the muster list that involve interacting with and providing direct assistance to passengers or personnel assigned responsibility for a muster station. Passenger ship crowd management training should be supplemented by passenger ship emergency familiarization and should be for applicable personnel only. Documentary evidence of the familiarization training should be recorded by the company with electronic records\* being considered acceptable.

13 Care should be taken to ensure that the abilities to be listed under section A-V/2 do not duplicate the abilities listed under passenger ship emergency familiarization or any other chapters of the STCW Code. Abilities for inclusion in passenger ship crowd management training should be listed in the format currently found in section A-V/2, paragraph 1, and amended as appropriate.

#### *Passenger ship crisis management and human behaviour training*

14 The co-sponsors consider crisis management and human behaviour training to be appropriate to personnel directly involved in evaluating, planning, managing and decision-

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\*Reference is made to FAL.5/Circ.39/Rev.1 "Guidelines for use of electronic certificates"

making in an emergency response. Passenger ship crisis management and human behaviour training should be supplemented by passenger ship emergency familiarization and should be for applicable personnel only. In practice, this training should be for applicable management level personnel.

15 A competency table already exists in the STCW Code for this training as table A-V/2 and could be amended as appropriate.

*Ro-ro passenger ship training*

16 The co-sponsors consider this to be specialized training for applicable personnel serving on board ro-ro passenger ships. Given the diverse abilities currently listed under section A-V/2, paragraph 4, the co-sponsors consider that personnel should be trained to attain the abilities appropriate to their capacity, duties and responsibilities. The applicable personnel should also be required to complete the training and familiarization for all passenger ships as applicable.

17 Care should be taken to ensure that the abilities to be listed in section A-V/2 do not duplicate the required abilities listed under the proposed passenger ship emergency familiarization or any other chapters of the STCW Code. Furthermore, the abilities should only address ro-ro passenger ship specific "gaps". Abilities for inclusion in ro-ro passenger ship training should be listed in the format currently found in section A-V/2, paragraph 4, and amended as appropriate.

**Action requested of the Sub-Committee**

18 The Sub-Committee is invited to consider the comments within this document, the proposed approach in paragraphs 10 to 17, and take action as appropriate.

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