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104th session  
Agenda item 15

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## WORK PROGRAMME

### Proposal for a new output for the comprehensive review and revision of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, and Code

Submitted by Australia, Austria, Belgium, Bulgaria, Canada, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany, Ghana, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Marshall Islands, Netherlands, Philippines, Poland, Portugal, Romania, Singapore, Slovakia, Slovenia, Spain, Sweden, EC, ICS and IAMU

#### SUMMARY

*Executive summary:* This document proposes a new output to be considered by the Sub-Committee on Human Element, Training and Watchkeeping (HTW) concerning a comprehensive review and revision of the STCW Convention and Code. The aim is to adapt the STCW Convention and Code to new technical developments in shipping, environmental protection and climate change, thus ensuring that it continues to provide a set of globally recognized standards for training and certification of seafarers.

*Strategic direction, if applicable:* 1, 2, 5 and 6

*Output:* Not applicable

*Action to be taken:* Paragraph 26

*Related documents:* HTW 4/INF.4; HTW 5/15/5, HTW 5/16, HTW 5/INF.5; HTW 6/9, HTW 6/9/1, HTW 6/12 and Corr.1, HTW 6/12/3, HTW 6/12/5, HTW 6/12/6, HTW 6/13; HTW 7/6, HTW 7/9, HTW 7/11, HTW 7/12; ISWG-MASS 1/2/20; MSC 100/17/7; MSC 101/21/1, MSC 101/21/18, MSC 101/24; MSC 102/5/17, MSC 102/5, MSC 102/5/1; FAL.5/Circ.39/Rev.2; MEPC 73/19; MEPC 74/18/Add1 and NCSR 4/29

#### Introduction

1 This document is submitted in accordance with paragraphs 4.6 and 6.12.2 of the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.2), taking into account the *Application of the Strategic Plan of the Organization* (resolution A.1111(30)).

2 The submission proposes a new output for the comprehensive review and revision of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, and Code.

### **Background**

3 The International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW), 1978, was adopted with the objective of promoting safety of life at sea and the protection of the marine environment by establishing international standards of training, certification and watchkeeping for seafarers.

4 The 1978 STCW Convention entered into force on 28 April 1984. Amendments thereto were adopted in 1991, 1994, 1995, 1997, 1998, 2004, 2006, 2010, 2014, 2015 and 2016. Major amendments were adopted in 1995 (with the adoption of the STCW Code) and in 2010.

5 The 1995 amendments introduced, inter alia, the STCW Code with its tables of competence, functions and levels of responsibility, the concept of flag State endorsements attesting the recognition of certificates, and provisions on quality standards systems.

6 The 2010 amendments ("Manila amendments") included, among others, improved measures to prevent fraudulent practices associated with Certificates of Competency (CoCs). They also contained revised requirements on hours of rest in line with the provisions of hours of work of the Maritime Labour Convention (MLC, 2006), new requirements for the prevention of seafarers' fatigue and drug and alcohol abuse, enhanced standards for engineer officers, updated competence standards for personnel serving on board all types of tankers, improved monitoring of Parties' compliance with the Convention and established standards of training for ratings now included in the STCW Convention and Code.

7 The Conference of the Parties that adopted the 2010 amendments also adopted other resolutions, including resolution 15 on "Future amendments and review of the STCW Convention and Code", which:

"RECOMMENDS FURTHER that a comprehensive review of the STCW Convention and Code should, as far as possible, be carried out every ten years to address any inconsistencies identified in the interim; and to ensure that they are up to date with emerging technologies."

8 At HTW 6, the debate on the International Chamber of Shipping (ICS) proposal for a comprehensive review of the STCW Convention and Code (HTW 6/12/3) showed that the majority of Member States and international organizations that spoke during the discussion expressed support for conducting a comprehensive review of the STCW Convention and Code.

9 The HTW Sub-Committee subsequently invited interested Member States and international organizations to note the comments made during HTW 6 and to submit a proposal for a new output to MSC.

### **IMO objectives**

10 This new output is fully in line with the IMO vision statement declared in resolution A.1110(30) on the *Strategic Plan for the Organization for the six-year period 2018 to 2023*, as it will support to uphold IMO leadership role as the global regulator of shipping by focusing on the review, development and implementation of and compliance with IMO instruments. Moreover, this new output will contribute to respond to the challenges posed by the expansion

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of the global fleet and the acceleration in the development of new and advancing technologies, which increase the demands on the seafarers, as the Strategic Plan recognized. The proposal follows the Overarching Principles established in the Strategic Plan, in which IMO has committed itself to consider the human element in the review, development and implementation of new and existing requirements, including skills, education and training, and human capabilities, limitations and needs.

## **Need**

11 Since the comprehensive review of the STCW Convention and Code that concluded in the 2010 Manila amendments, the Convention and the Code have only been amended three times to date. Further amendments are likely to be adopted over the short and medium-term, taking into account the items in the Sub-Committee's work programme that could also lead to a number of potential amendments.

12 Developments in the shipping industry, meanwhile, particularly those related to the operation of ships, would in any case suggest the need for such a review to be conducted in the short-term.

13 The outcome of HTW 6, as referred in paragraph 12.33.1 of the report of the Sub-Committee to the Maritime Safety Committee (HTW 6/13) was that, if the comprehensive review is to be initiated, the finalization and entry into force of the amendments, would take a lengthy period of time.

14 Regardless of how the review is undertaken, either by way of a targeted review or by a comprehensive review, the resulting revision is not anticipated to come fully into effect for a number of years until the process is completed.

## **Analysis of the issue**

15 A comprehensive review would lead to a revision of the STCW Convention and Code, opening up the whole instrument for consideration. The areas listed below present a non-exhaustive list of subjects/topics that demonstrate the need for a comprehensive review of the STCW Convention and Code.

- .1 Current pace of technical developments and digitalization. Within the last decade vessels and equipment have evolved considerably. Technological developments in shipping, as well as environmental challenges have provided the industry with new types of vessels and equipment, requiring new competences for seafarers. Furthermore, the same technological developments open new possibilities to deliver training as well as certification mechanisms. E-certification is an example of a development where work is ongoing on amendments to the STCW Convention and Code and such amendments would facilitate the issuing of certificates for administrations, seafarers and the industry. In addition, the introduction of more complex digital and sustainable technologies on board, including the potential operation of Maritime Autonomous Surface Ships (MASS), requires seafarer education and training to include related standards of competence. With the introduction of new teaching technologies, e.g. e-learning, it is envisaged that more training can be obtained using these. Therefore, a review of the STCW Convention and Code would allow to open up teaching to supplement and support shore-based training, including methods for assessment of competence.

- .2 Concerns about the quality of onboard training. Onboard training represents an important part of the training process for future seagoing officers. As part of a comprehensive review of the STCW Convention and Code, it is important to focus on improving the quality of the required period of onboard training, taking also into account up-to-date learning technologies, including simulators. At a time when it is difficult for cadets to complete the required period of seagoing service due to the non-availability of vessels, the outcomes of the new output on the "Development of measures to ensure quality of onboard training as part of the mandatory seagoing service required by the STCW Convention" can serve as the basis for the review.
- .3 Challenges related to implementation by Parties. The comprehensive review of the STCW Convention and Code should explore different possibilities to improve the requirements for implementation and evaluation arising from the so-called STCW White List as per MSC.1/Circ.1163 and the independent evaluation.
- .4 Development of training. The current IMO process is to start developing training standards only after the adoption of the IMO instruments in respect of which said training is necessary. In some cases, this may take years, resulting in a misalignment between the date of entry into force of the provisions or standards and the relevant training standards. Examples include, but are not limited to, the training standards for personnel serving on board ships operating in polar waters and for personnel on ships subject to the International Code of Safety for Ships using Gases or other Low-flashpoint Fuels (IGF Code). As new technologies continue to appear, it is imperative to ensure seafarers are properly trained and competent to use and interact with developing technology. There are several key issues that IMO must address in order to provide for a sustainable process in support of the introduction of new technologies.
- .5 Addressing inconsistencies. A series of inconsistencies can be identified in the text of the STCW Convention and Code. This is the result of several amendments that have been adopted throughout the years. A review of the STCW Convention and Code should look at those inconsistencies, not least in the tables of competence, resulting in the proposal to introduce necessary corrections throughout the text. This would contribute to enhance the consistency and the uniform implementation of the STCW Convention and Code.
- .6 Addressing interpretations. Inconsistent interpretations of the various standards have been identified as part of the process of implementation and enforcement. The comprehensive review of the STCW Convention and Code opens the opportunity to clarify issues arising from inconsistent interpretations of the various standards, including those related to near coastal voyages, in particular the entering of an undertaking among Parties.
- .7 Addressing taxonomy and terminologies that have changed or are inconsistent. The newly developed taxonomy should be considered when reviewing the STCW Convention and Code in order to ensure the consistency of the verbs used in the STCW Convention and Code defining the standards of competence with the action verbs used in modern educational standards.

- .8 Revalidation. As demonstrated by the COVID-19 pandemic, in exceptional circumstances such as pandemics or other force majeure situations, it may not be possible to replace crew members as planned. A comprehensive review of the Convention and Code would allow to identify provisions that could be amended or new provisions that would need to be added to allow for limited extension of validity of certificates and endorsements, whenever such exceptional circumstances occur.
- .9 Addressing watchkeeping practices. Maritime accident reports have concluded about inappropriate watchkeeping practices leading to serious casualties. Current practices should be addressed during the review process in order to effectively address the contribution of the human factor to maritime accidents.

### **Analysis of implications**

16 The suggested new output may require holding additional high-level meetings to discuss the comprehensive review of the Convention and put additional burden on the Secretariat, as was demonstrated by the process leading to the 2010 Manila Amendments. The work burden in the Sub-Committee and the costs should be carefully discussed at the HTW Sub-Committee.

17 It is considered that the suggested new output will not lead to any additional administrative requirements or burdens because the revision will update existing requirements and there should be no increase of costs for the maritime industry.

18 In this regard, the completed administrative checklist, as set out in annex 5 to the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.2), is set out in annex 1.

### **Benefits**

19 A comprehensive review of the STCW Convention and Code would have the following main advantages:

- .1 ensure that the STCW Convention continues to support seafarers who are competent to perform the functions required on board ships;
- .2 ensure that the STCW Convention continues to provide a set of globally recognized standards for training and certification of seafarers;
- .3 ensure that the STCW Convention is designed to respond or adapt to the pace of technological, regulatory and operational developments; and
- .4 ensure that the STCW Convention is structured and organized in a manner facilitating harmonized and consistent implementation.

### **Industry standards**

20 There are no other industry provisions or standards applicable to the proposed output other than the provisions of the STCW Convention and the Code.

## **Output**

21 The proposed title of the new output is: "Comprehensive review and revision of the STCW Convention and Code".

22 It is anticipated that, if the Committee approves this output at this session for inclusion in the upcoming provisional agenda of the HTW Sub-Committee (HTW 8), this could be completed in four Sub-Committee sessions.

## **Human element**

23 The completed checklist contained in the *Checklist for considering human element issues by IMO bodies* (MSC-MEPC.7/Circ.1) is set out in annex 2.

## **Urgency**

24 Since it is estimated that the resulting revision will not come fully into effect before a number of years until the process is completed, it is suggested that this issue be further considered by the Organization, as soon as possible and as a matter of priority. In this regard, the new output could be included in the Strategic Plan's list of outputs for the upcoming biennium, as well as in the upcoming provisional agenda for the HTW Sub-Committee, for completion in no more than four sessions.

25 The Committee is requested to consider the present submission and justification therein, and to include a new output in the Committee's biennial agenda for the 2022-2023 biennium on the "Comprehensive review and revision of the STCW Convention and Code", and the provisional agenda for HTW 8, assigning the HTW Sub-Committee as the coordinating organ.

## **Action requested of the Committee**

26 The Committee is invited to consider the information provided above and the new output suggested in paragraph 25 above, and take action, as appropriate.

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**ANNEX 1**

**CHECKLIST FOR IDENTIFYING ADMINISTRATIVE REQUIREMENTS AND BURDENS**

The Checklist for Identifying Administrative Requirements and Burdens should be used when preparing the analysis of implications required of submissions of proposals for inclusion of unplanned outputs. For the purpose of this analysis, the terms "administrative requirements" and "burdens" are defined as in resolution A.1043(27), i.e. administrative requirements are defined as an obligation arising from future IMO mandatory instruments to provide or retain information or data, and administrative burdens are defined as those administrative requirements that are or have become unnecessary, disproportionate or even obsolete.

**Instructions:**

(A) If the answer to any of the questions below is **YES**, the Member State proposing an unplanned output should provide supporting details on whether the burdens are likely to involve start-up and/or ongoing cost. The Member State should also make a brief description of the requirement and, if possible, provide recommendations for further work (e.g. would it be possible to combine the activity with an existing requirement?).

(B) If the proposal for the unplanned output does not contain such an activity, answer **NR** (Not required).

(C) For any administrative requirement, full consideration should be given to electronic means of fulfilling the requirement in order to alleviate administrative burdens

1. Notification and reporting? Reporting certain events before or after the event has taken place, e.g. notification of voyage, statistical reporting for IMO Members, etc.	NR <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> Start-up <input type="checkbox"/> Ongoing
Description of administrative requirements(s) and method of fulfilling it: (if the answer is yes)		
2. Record keeping? Keeping statutory documents up to date, e.g. records of accidents, records of cargo, records of inspections, records of education, etc.	NR <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> Start-up <input type="checkbox"/> Ongoing
Description: (if the answer is yes)		
3. Publication and documentation? Producing documents for third parties, e.g. warning signs, registration displays, publication of results of testing, etc.	NR <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> Start-up <input type="checkbox"/> Ongoing
Description of administrative requirement(s) and methods of fulfilling it: (if the answer is yes)		
4. Permits or applications? Applying for and maintaining permission to operate, e.g. certificates, classification society costs, etc.	NR <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> Start-up <input type="checkbox"/> Ongoing
Description: (if the answer is yes)		
5. Other identified burdens?	NR <input checked="" type="checkbox"/>	Yes
Description of administrative requirement(s) and methods of fulfilling it: (if the answer is yes)		

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**ANNEX 2**

**CHECKLIST FOR CONSIDERING HUMAN ELEMENT ISSUES BY IMO BODIES**

<b>Instructions:</b> If the answer to any of the questions below is:	
(A) <b>YES</b> , the preparing body should provide supporting details and/or recommendation for further work.	
(B) <b>NO</b> , the preparing body should make proper justification as to why human element issues were not considered.	
(C) <b>NA</b> (Not Applicable) – the preparing body should make proper justification as to why human element issues were not considered applicable.	
<b>Subject being assessed:</b> (e.g. Resolution, Instrument, Circular being considered)	
<b>Proposal for a new output for the Comprehensive Review and Revision of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers and Code</b>	
<b>Responsible Body:</b> (e.g. Committee, Sub-Committee, Working Group, Correspondence Group, Member State)	
<b>Maritime Safety Committee (MSC)</b>	
1. Was the human element considered during development or amendment process related to this subject?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
2. Has input from seafarers or their proxies been solicited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
3. Are the solutions proposed for the subject in agreement with existing instruments? (Identify instruments considered in comments section)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
4. Have human element solutions been made as an alternative and/or in conjunction with technical solutions?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
5. Has human element guidance on the application and/or implementation of the proposed solution been provided for the following:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
• Administrations?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
• Ship owners/managers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
• Seafarers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
• Surveyors?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
6. At some point, before final adoption, has the solution been reviewed or considered by a relevant IMO body with relevant human element expertise?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
7. Does the solution address safeguards to avoid single person errors?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
8. Does the solution address safeguards to avoid organizational errors?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
9. If the proposal is to be directed at seafarers, is the information in a form that can be presented to and is easily understood by the seafarer?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
10. Have human element experts been consulted in development of the solution?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
<b>11. HUMAN ELEMENT: Has the proposal been assessed against each of the factors below?</b>	
<input type="checkbox"/> <b>CREWING.</b> The number of qualified personnel required and available to safely operate, maintain, support, and provide training for system.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
<input type="checkbox"/> <b>PERSONNEL.</b> The necessary knowledge, skills, abilities, and experience levels that are needed to properly perform job tasks.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA

<input type="checkbox"/> TRAINING. The process and tools by which personnel acquire or improve the necessary knowledge, skills, and abilities to achieve desired job/task performance.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
<input type="checkbox"/> OCCUPATIONAL HEALTH AND SAFETY. The management systems, programmes, procedures, policies, training, documentation, equipment, etc. to properly manage risks.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
<input type="checkbox"/> WORKING ENVIRONMENT. Conditions that are necessary to sustain the safety, health, and comfort of those working on board, such as noise, vibration, lighting, climate, and other factors that affect crew endurance, fatigue, alertness and morale.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
<input type="checkbox"/> HUMAN SURVIVABILITY. System features that reduce the risk of illness, injury, or death in a catastrophic event such as fire, explosion, spill, collision, flooding, or intentional attack. The assessment should consider desired human performance in emergency situations for detection, response, evacuation, survival and rescue and the interface with emergency procedures, systems, facilities and equipment.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
<input type="checkbox"/> HUMAN FACTORS ENGINEERING. Human-system interface to be consistent with the physical, cognitive, and sensory abilities of the user population.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
<p><b>Comments:</b></p> <ul style="list-style-type: none"> <li>(1) Justification if answers are NO or Not Applicable.</li> <li>(2) Recommendations for additional human element assessment needed.</li> <li>(3) Key risk management strategies employed.</li> <li>(4) Other comments.</li> <li>(5) Supporting documentation.</li> </ul> <p>The justification as to why human element issues were not considered NO or NA (Not Applicable) is as follows:</p> <p>(11) The proposal does not go into detail on the operational dimension of the human element.</p>	

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**ANNEX 3**

**CHECK/MONITORING SHEET FOR THE PROCESSING OF AMENDMENTS TO  
SAFETY-RELATED IMO CONVENTION, OTHER THAN THE 1974 SOLAS  
CONVENTION, AND RELATED MANDATORY INSTRUMENTS  
(PROPOSAL/DEVELOPMENT)**

**Part I – Submitter of proposal (refer to paragraph 3.1.1)<sup>1</sup>**

1	<i>Submitted by</i> <b>Australia, Austria, Belgium, Bulgaria, Canada, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany, Ghana, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Marshall Islands, Netherlands, Philippines, Poland, Portugal, Romania, Singapore, Slovakia, Slovenia, Spain, Sweden, EC, IAMU and ICS</b>
2	<i>Meeting session</i> <b>MSC 104</b>
3	<i>Date (date of submission)</i> <b>30.06.2021</b>

**Part II – Details of proposed amendment(s) or new mandatory instrument (refer to paragraphs 3.1.1 and 3.1.2)<sup>1</sup>**

1	<i>Strategic direction</i>
	<b>1, 2, 5 and 6</b>
2	<i>Title of the output</i>
	<b>Comprehensive review and revision of the STCW Convention and Code</b>
3	<i>Instruments intended for amendment (i.e. the conventions and relevant mandatory instruments) or developed (new code, new version of a code, etc.)</i>
	<b>STCW Convention and Code</b>
4	<i>Intended application (scope, size, type, tonnage/length restriction, service (international/non-international), activity, etc.)</i>
	<b>International, seafarers</b>
5	<i>Application to new/existing ships</i>
	<b>n/a</b>
6	<i>Proposed coordinating sub-committee</i>
	<b>Sub-Committee on Human Element, Training and Watchkeeping</b>
7	<i>Anticipated supporting sub-committees</i>
	<b>n/a</b>

<sup>1</sup> Parts I and II should be completed by the submitter of a proposed new amendment, to the fullest extent possible.

8	<i>Timescale for completion</i>
	<b>Not defined</b>
9	<i>Expected date(s) for entry into force and implementation/application</i>
	<b>2035</b>
10	<i>Any relevant decision taken or instruction given by the Committee</i>
	<b>n/a</b>

**Part III – Process monitoring to be completed during the work process at the Sub-committee and checked as part of the final approval process by the Committee (refer to paragraph 3.1.3)<sup>2</sup>**

1	The Sub-committee, at an initial engagement, has allocated sufficient time for technical research and discussion before the target completion date, especially on issues needing to be addressed by more than one sub-committee and for which the timing of relevant sub-committees meetings and exchanges of the result of consideration needed to be carefully examined.	n/a
2	The scope of application agreed at the proposal stage was not changed without the approval of the Committee.	n/a
3	The technical base document/draft amendment addresses the proposal's issue(s) through the suggested instrument(s); where it does not, the sub-committee offers the Committee an alternative method of addressing the problem raised by the proposal.	yes
4	Due attention has been paid to the <i>Interim guidelines for the systematic application of the grandfather clauses</i> (MSC/Circ.765-MEPC/Circ.315).	yes
5	All references have been examined against the text that will be valid if the proposed amendment enters into force.	n/a
6	There are no inconsistencies in respect of scope of application between the technical regulation and the application statement of the relevant chapter, and application is specifically addressed for existing and/or new ships, as necessary.	n/a
7	Where a new term has been introduced into a regulation and a clear definition is necessary, the definition is given in the article of the convention or at the beginning of the chapter.	yes

<sup>2</sup> Part III should be completed by the drafting/working group that prepared the draft text using "yes", "no" or "not applicable". For the draft amendments to be considered and finalized by sub-committees in plenary within one session, the Secretariat may be requested, when necessary, to complete part III of the check/monitoring sheet after the session, instead of establishing a specific working/drafting group. "Minor corrections" (C/ES.27/D, paragraph 3.2(vi)) may be excluded from application of the provisions for completion of the check/monitoring sheet.

8	Where any of the terms "fitted", "provided", "installed" or "installation" are used, consideration has been given to clarifying the intended meaning of the term.	n/a
9	All necessary related and consequential amendments to other existing instruments, including non-mandatory instruments, in particular to the forms of certificates and records of equipment required in the instrument being amended, have been examined and included as part of the proposed amendment(s).	n/a
10	The forms of certificates and records of equipment have been harmonized, where appropriate, between the convention and its protocol(s).	n/a
11	It is confirmed that the amendment is being made to a currently valid text and that no other bodies are concurrently proposing changes to the same text.	yes
12	Other impacts of the implementation of the proposed/approved amendment have been fully analysed, including consequential amendments to the "application" and "definition" regulations of the chapter.	yes
13	The amendments presented for adoption clearly indicate changes made with respect to the original text, so as to facilitate their consideration.	n/a
14	For amendments to mandatory instruments, the relationship between the convention and the related instrument has been observed and addressed, as appropriate.	yes
15	The related record format has been completed or updated, as appropriate.	yes