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COMPREHENSIVE REVIEW OF THE 1978 STCW CONVENTION AND CODE

Comments on documents HTW 9/7

Submitted by ICS and ITF

SUMMARY

Executive summary: This document comments on document HTW 9/7 and the review of the STCW Convention and Code. It draws attention to the ongoing work of the Maritime Just Transition Task Force, including a new report commissioned from the classification society DNV, providing insights into seafarer training and skills needed to support shipping's decarbonization. The research provides an overview of the challenges that training seafarers for the transition will entail. This document also draws attention to an action plan on "Mapping a Maritime Just Transition for Seafarers", developed by the Task Force and informed by the DNV report findings.

Strategic direction, if applicable: 6

Output: 6.17

Action to be taken: Paragraph 13

Related documents: HTW 9/7 and MEPC.304(72)

Background

1 In 2018, the Organization adopted an *Initial IMO strategy on reduction of greenhouse gas emissions from ships* (resolution MEPC.304(72)). In 2021, the Marine Environment Protection Committee (MEPC) agreed to revise the Initial Strategy to strengthen the decarbonization ambition (MEPC 77). A revised IMO GHG strategy is expected to be adopted at MEPC 80 in 2023. To reach shipping's ambitious decarbonization goals, the industry must shift away from fossil fuels and transition to low- and zero-carbon fuels. The global seafaring workforce will need additional training to handle these new fuels and to mitigate any health and safety risks for seafarers themselves, ships, communities and the environment.

2 Through the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW), 1978, IMO provides global minimum standards for training and certification of seafarers, with the objective of promoting safety of life and property at sea and the protection of the marine environment. At its 105th session, the Maritime Safety

Committee (MSC) agreed to include in the biennial agenda of the HTW Sub-Committee for 2022-2023 and the provisional agenda for HTW 9, an output on "Comprehensive review of the 1978 STCW Convention and Code". Recognizing that seafarers are key to shipping's decarbonization and considering the unique risks in using some of the fuels being considered for propulsion of ships (e.g. ammonia and hydrogen), the co-sponsors believe that the review of the STCW Convention is a timely development, to assess and discuss the training and skills seafarers will need to support a decarbonized shipping industry.

The Maritime Just Transition Task Force and the Global Industry Peer Learning Group

3 A Just Transition is a people-centred response to addressing the climate emergency. According to the International Labour Organization (ILO), this means greening the economy in a way that is as fair and inclusive as possible, creating decent work opportunities. The guiding principles of Just Transition are established in [ILO's Guidelines for a Just Transition towards environmentally sustainable economies and societies for all \(2015\)](#). These guidelines are just as relevant in the context of shipping and its principles should underpin the industry's transition, which can become a strong driver for creation of new jobs and upskilling, if managed properly.

4 The Task Force is a global sectoral initiative, set up during COP 26 in 2021, by ICS, ITF and the United Nations Global Compact, alongside IMO and ILO, to ensure that shipping's response to the climate emergency puts seafarers at the heart of the solution, complemented by globally established Just Transition principles. The Task Force is supported by a [Global Industry Peer Learning Group](#), comprising international organizations, private companies, workers and academia (including training providers). Representatives from ICS, ITF and the UN Global Compact serve as the Task Force Secretariat.

Phase 1: mapping a maritime Just Transition for seafarers

5 With alternative fuel technologies expected to introduce new training requirements for seafarers, the Task Force Secretariat commissioned a report from DNV, to provide [insights into seafarer training and skills needed to support a decarbonized shipping industry](#). This included an analysis of training challenges. Modelling three different shipping decarbonization scenarios, the DNV report showed the effect of each scenario on the number of seafarers that would need additional training for the transition. All three scenarios point to an immediate need to start providing additional training to at least hundreds of thousands of seafarers by 2050. The report further highlights that:

- .1 a shortage of experienced seafarers and a lack of clarity about viability and uptake of alternative fuel options, as well as uncertainty surrounding regulatory developments, is making it difficult to plan effectively for the transition of seafarers and to attract investment towards new skills programmes, training centres and up-to-date training equipment, compatible with the industry's needs; and
- .2 meeting shipping's decarbonization goals, coupled with fast-moving technological developments, including increased automation, requires careful monitoring and reflects a trend towards "higher-skilled" seafarers. Increased IT, digital, technical and organizational competence will be needed in future, to meet the demands associated with decarbonization. Special attention should be paid to systems which can equip all relevant seafarers with new skills.

Mapping a maritime Just Transition for seafarers

6 Informed by the findings of the DNV report, the Task Force Secretariat (in consultation with the IMO and ILO Secretariats and supported by the Global Peer Learning Group) developed a [10-point-action plan](#) for international organizations, industry, workers and academia (including training providers), setting out recommendations to help unlock the seafarer training and skills needed to support shipping's decarbonization goals.

7 As regards training and skills, the recommendations call for global training standards for seafarers to be strengthened in the ongoing review of the STCW Convention and Code. In identifying areas for potential revision, this should include replacing or updating obsolete competencies and knowledge, understanding and proficiency (KUP), in line with shipping's digitalization evolution and decarbonization trajectory. Specific recommendations include:

- .1 the need to urgently revise or establish standards and training requirements for alternative fuel types through amendments to the STCW Convention, as necessary, in consultation with the industry and social partners (shipowners and seafarers), to help ensure that training centres are able to invest in new skills programmes, simulators and engine replicas, etc.;
- .2 an updated STCW Convention should not be overly prescriptive, given the rapidly changing technological landscape, and should be flexible to accommodate technological advancements; and
- .3 existing IMO STCW methodology and requirements employed for competency on gas and tanker segments may serve as a model for seafarer training and familiarization on board ships to handle new fuel types.

During the ongoing comprehensive review of the STCW Convention and Code, close attention should be paid to the relevant skills required at present, as well as those that will be required for seafarers in 2050. Obsolete competencies should be updated or removed in order to mitigate and manage the training burden on seafarers. New competencies or KUPs may need to be developed.

8 The position paper also calls for equitable training models to be delivered for all seafarers, to ensure that they can keep up with technological advances needed to support the industry's decarbonization. This is especially beneficial for seafarers from developing countries, SIDS and LDCs. Other recommendations include:

- .1 to expedite seafarer training, guidelines to cover the handling of additional alternative fuels – within the International Code of Safety for Ships Using Gases or Other Low-flashpoint Fuels (IGF Code) – should be prioritized and completed before the STCW review process is concluded;
- .2 post STCW review, a training system should be developed, with the role of maritime universities strengthened to provide an upskilled education as per STCW-related competencies (basic and advanced) and of industry to provide specialized fuel-specific training, as per new global requirements and goals; and
- .3 the establishment of technical cooperation partnerships on training with seafarer-supplying countries, e.g. train-the-trainer between national maritime authorities should be explored.

9 The position paper calls for national decarbonization plans, including spending and investment, to take full account of shipping's growing need for skills to support its decarbonization. Specific recommendations include:

- .1 maritime decarbonization plans, such as [National Action Plans \(NAPs\)](#) to address GHG emissions from ships, should (where relevant) factor in investments towards the necessary seafarer skills development for shipping's transition;
- .2 investment towards skills development for decarbonizing shipping should include enhancement of maritime training establishments (e.g. proper facilities and equipment), including the competency of trainers, as well as incentives to obtain licensing and necessary sea time; and
- .3 establishment of "national maritime skills councils", as advisory bodies, to complement the STCW training framework, including giving special attention to the additional skills that the maritime workforce will need to handle alternative fuels. These sector specific skills councils should help to specify the nature of the skills the industry needs, monitor skills shortages and advise on the levels of training needed overall (ILO provides further insights [here](#)).

10 Regarding national skills councils, active engagement of social partners (shipowners and seafarers) is indispensable for identifying skills gaps, implementing training provisions, and recognizing skills acquired on the job. Effective monitoring and anticipation of skills needed is fundamental to a Just Transition and ensures that skills gaps do not widen exponentially. These councils should serve as a strategic collaborative platform involving national governments, industry representatives, training providers, and seafarer representatives, amongst others, to collectively establish a clear collective vision, and roadmap at national level.

Proposal

11 As HTW Sub-Committee initiates its review of the STCW Convention, the co-sponsors suggest that the Sub-Committee advise MSC to work in synergy with MEPC, in the context of the latter's ongoing work on a revised GHG reduction strategy, noting that this strategy could have an impact on the scale and speed of investment needed to safely train seafarers. The DNV report revealed that as many as 800,000 seafarers might require some additional training by the mid-2030s, with the timing and type of training dependent on the ambition of shipping's decarbonization trajectory and the future fuel mix.

12 Seafarer labour-supplying countries may need support during shipping's transition, as they confront the challenges of keeping pace with the demands of new training standards, including those associated with decarbonization. This might require targeted technical cooperation and capacity building support – with special focus on developing countries, least developed countries (LDCs) and small island developing States (SIDS) – which IMO is best positioned to provide, including for the potential establishment of "national maritime skills councils". The Sub-Committee is encouraged to advise MSC accordingly.

Action requested of the Sub-Committee

13 The Sub-Committee is invited to consider the comments provided in this document, including the recommendations set out in paragraphs 7 to 10, and the proposals in paragraphs 11 and 12, and take action as appropriate.