

SUB-COMMITTEE ON HUMAN ELEMENT,
TRAINING AND WATCHKEEPING
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Agenda item 6

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COMPREHENSIVE REVIEW OF THE 1978 STCW CONVENTION AND CODE

Comments on document HTW 11/6

Submitted by ICS

SUMMARY

<i>Executive summary:</i>	This document comments on document HTW 11/6, in particular the decision taken by the ISWG STCW in relation to proposals by ICS in document ISWG-STCW 1/2/19 on chapters VII and VIII of the STCW Convention and Code.
<i>Strategic direction, if applicable:</i>	6
<i>Output:</i>	6.17
<i>Action to be taken:</i>	Paragraph 11
<i>Related documents:</i>	HTW 10/10; ISWG-STCW 1/2/19 and HTW 11/6

Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of 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.5) and comments on document HTW 11/6 (Report of the Intersessional Working Group on the Comprehensive Review of the STCW Convention and Code).

Background

2 The Intersessional Working Group on the Comprehensive Review of the STCW Convention and Code (the Group), guided by the aims, principles and methodology for the comprehensive review approved by the Committee, taking into account the list of specific areas identified, the non-exhaustive lists of the documents on proposals for amendments to the STCW Convention and Code, and topics for consideration, as set out in annex 8 to document HTW 10/10, and the documents received, was instructed to:

- .1 consider proposals on identified gaps and provisions that should be addressed;

- .2 evaluate the non-exhaustive lists of documents and topics to support the identification of gaps and provisions to be addressed;
- .3 based on the outcome of sub-paragraphs .1 and .2, develop a preliminary list of gaps and provisions to be addressed;
- .4 prepare a work plan and recommendations to complete the review of all the provisions of the Convention and Code;
- .5 revise the road map, if necessary;
- .6 consider the draft MSC resolution on accessibility of information related to medical provisions in the STCW Convention set out in the annex to document HTW 10/6/9, with a view to approval by the Committee; and
- .7 submit a report to HTW 11.

Consideration of identified gaps and provisions to be addressed

3 Having considered the proposals submitted, the Group prepared the list of identified gaps, as set out in annex 1 of HTW 11/6, and took actions as outlined in paragraphs 5 to 97 of HTW 11/6.

Chapters VII and VIII of the Convention and Code

4 Due to time constraints, the Group was unable to give detailed consideration to the gaps identified in chapters VII and VIII of the Convention and Code. Having noted that chapters VII and chapter VIII were specific areas 17 and 18 identified for the comprehensive review, as set out in annex 4 to document HTW 10/10, the Group gathered all the proposals in relation to the gaps identified in chapters VII and VIII, with a view to being further considered as a part of the comprehensive review (HTW 11/6, paragraph 83).

Proposal made by ICS to the ISWG-STCW

5 Based on the methodology for a structured approach to the comprehensive review of the STCW Convention and Code established by HTW 10 and approved by MSC 108, ICS identified the following gaps and provisions that should be addressed in relation to chapters VII and VIII in annex 2 (Gaps identified in the annex to the STCW Convention) of document ISWG STCW 1/2/19:

- .1 chapter VII – Review the suitability of non-maritime graduates to enter the maritime workforce and enhancing the possibilities for alternative certification (ISWG-STCW 1/2/19, annex 2, page 7); and
- .2 chapter VIII – Watchkeeping arrangements and principles (ISWG-STCW 1/2/19, annex 2, page 9).

Discussion

6 ICS would like to explain that, in addition to the justifications provided in document ISWG-STCW 1/2/19 to merit the consideration of the identified gap for review, the proposals referred to in paragraph 5 above are linked to modernization of the Convention towards acceptance of emerging technologies on ships and ship operations and to address some prescriptive aspects.

7 The proposals are also intended to improve flexibility to attract entrants to the maritime workforce from non-maritime streams or to permit seafarers to be qualified in different functions on board ships.

8 ICS notes that the proposals in document ISWG-STCW 1/2/19 are not included in annex 1 of HTW 11/6 under appendices 8 (chapter VII) and 9 (chapter VIII). However, those have been included under annex 3 (Proposals for gaps identified in relation to MASS) of HTW 11/6, which we believe is an inaccurate assessment.

9 The Group, having noted that MSC 108 had agreed to develop high-level training provisions for the MASS Code, whereby the detailed competence, and knowledge, understanding and proficiency (KUPs) requirements might be developed by the HTW Sub-Committee at a later stage, when the Code had been finalized, agreed to gather all the proposals submitted to the Group regarding the development of MASS training requirements for future consideration, as set out in annex 3 of HTW 11/6. However, the Group did not discuss in detail if the proposals were exclusively MASS-related (HTW 11/6, paragraph 93).

Proposal

10 ICS proposes that the Sub-Committee reflect on the discussion points in paragraphs 6 to 9 above and give due consideration to the proposals referred to in paragraph 5 above.

Action requested of the Sub-Committee

11 The Sub-Committee is invited to consider the proposal in paragraph 10, and take action, as appropriate.
