SUB-COMMITTEE ON STANDARDS OF TRAINING AND WATCHKEEPING
38th session
Agenda item 9

DEVELOPMENT OF COMPETENCES FOR RATINGS

Submitted by ICFTU

SUMMARY

Executive summary: This document identifies areas that have not been adequately covered in the intersessional correspondence group

Action to be taken: Paragraph 11

Related documents: STW 37/18; STW 37/WP.3 and STW 38/9

General

1. The thirty-sixth session of the Sub-Committee on Standards of Training and Watchkeeping recommended to the eightieth session of the Maritime Safety Committee that they develop international standards and competencies for ratings. MSC 80 endorsed this proposal, the International Labour Office was informed and a correspondence group set up.

2. Given the substantial variations in national standards for ratings under ILO Convention 74, the ICFTU welcomed this move and considered this to be an opportunity to ensure an international training standard, not only for watchkeeping ratings, but also for general operational requirements.

3. At STW 37 in WP.3, draft amendments to chapter II regulations II/5 (able seafarers) and III/5 (motorman) were proposed and agreed. In particular, there was specific agreement by the Sub-Committee to the service periods, STW 37/18, paragraphs 10.27 and 10.28.

4. At the time, the ICFTU expressed the view that the proposed regulations II/5 and III/5 did not provide evidence of achievement and a standard of competence for onboard training, (STW 37/18, paragraph 10.32). Many major maritime nations no longer have shore-based training facilities for ratings and, where they are available, such facilities can be accessed often with excessive cost to the individual. The ICFTU is extremely concerned that onboard training be maintained as a viable option and also that it be set up and monitored by the proper administration to the same standards as those receiving training in shore-based establishments.

5. The ICFTU further does not consider that regulation I/6, Training and Assessment or regulation I/8 Quality standards, adequately ensure that the option of onboard training be set up by the Administration or that an accepted method of recording this training be provided. Additionally with the current ambiguous wording it could be interpreted that by serving 18-months on board, with no formal training, followed by an assessment ashore, a rating could be certified as an able seafarer. This would lead again to the similar problem we have had with varying National training standards.
6 In response to these concerns, the correspondence group was given the additional term of reference;

   .1 Taking into account regulations I/6 and I/8, clarify that the proposed regulations II/5 and III/5 require on-board training to be approved and documented, and the criteria for reduction in sea service.

Report of the Correspondence Working Group

7 Whilst recognizing the difficult job of the correspondence group co-coordinator we have a number of concerns over the final report, as under:

   .1 the report does not address the above term of reference despite the discussion of the group;

   .2 although the ICFTU participated in the working group, with our position supported by a number of participants, and our comments circulated, there is no recognition of our comments or those of other Non-Governmental Organizations in the report;

   .3 as currently proposed, there are two routes for qualifying as an able seafarer. One stipulates a period of training at a shore-based facility followed by 12 months of at-sea work experience. Under this regime the training must comply with STCW and regulations 1/6 and 1/8 would apply. However, where shore-based training is forsaken for a longer period at sea, i.e. 18 months (12 months for an able seafarer-engine), there is no provision within the regulation to require any form of structured training or record whilst on board. Under such circumstances, regulations 1/6 and 1/8 would have no application. As currently worded, the proposed legislation allows for broad interpretation, which according to our understanding was not the original intent;

   .4 the service periods agreed in STW 37 are now in square brackets. These were agreed and should not have been discussed under the original terms of reference; and

   .5 at the same time, concerns were raised over the lack of clarity as to whether service periods included the service required for training as a watchkeeper, or commenced on qualifying in that role, these have not been included in the report.

ICFTU Proposal

8 Given the absence of our proposal and contributions from the report we would again submit the proposed additional wording for the consideration of the Sub-Committee, as follows:

   .1 Reg. II/5, paragraph 2.2.1
   .2.1 not less than 18 months with recorded training and experience; and

   .2 Reg. III/5, paragraph 2.2.1
   .2.1 not less than 12 months with recorded training and experience.
9 This wording is in line with other areas of the Convention concerning on-board training (chapter II A-II/1.6, A-II/3, A-III/1.2) and clarifies that the period on-board must include a suitable training programme. Where such training is not available on-board, as agreed, the training can be carried out in a training establishment ashore with six months less sea service. The square brackets should be removed from the service requirement in this report and the service starting point be clarified.

10 In respect of the submissions to the correspondence group, the ICFTU also considers that:

.1 ABs should be given a basic course in ships security awareness and their support role;

.2 ABs competency should include an advanced fire-fighting course and the basic crowd/crisis management course;

.3 ABs should be given a general understanding of the basic duties of an AB on all ship types;

.4 there should be further training in bridge disciplines and bridge team management;

.5 grand-parenting of ABs should be similar to that of officers, 12 months service in the position within the last 5 years; and

.6 there should be no further exemptions from sea service beyond the six months reduction proposed.

**Action requested of the Sub-Committee**

11 The Sub-Committee is invited to consider this document and take action as appropriate.