COMPREHENSIVE REVIEW OF THE STCW CONVENTION AND THE STCW CODE

Review of chapters V, VI and VIII of the STCW Convention and the STCW Code

Submitted by the International Transport Workers’ Federation (ITF)

SUMMARY

Executive summary: This document puts forward proposals for amendments to chapters V, VI and VIII of the STCW Convention and STCW Code and comments on papers currently submitted to this session

Action to be taken: Paragraph 5

Related documents: MSC 81/23, STW 39/7/7, STW 39/7/9, STW 39/7/13, STW 39/7/14, STW 39/7/23, STW 38/7, ILO Maritime Labour Convention and SN.1/Circ.265

Introduction

1 At the eighty-first session of the Maritime Safety Committee it was agreed, with the Sub-Committee on Standards of Training and Watchkeeping at its thirty-seventh session, to include in the work programme a high priority item on a ‘Comprehensive review of the STCW Convention and the STCW Code’. At the thirty-eighth session of the Sub-Committee the scope of the review and eight principles by which it would be conducted, as annexed to STW 38/7, was established and the Committee endorsed this.

2 The ITF is conscious that the review should only embrace the following principles:

.1 retain the structure and goals of the 1995 revision;

.2 not to downscale existing standards;

.3 not to amend the articles of the Convention;

.4 address inconsistencies, interpretations, MSC instructions, clarifications already issued, outdated requirements and technological advances;

.5 address requirements for effective communication;

.6 provide for flexibility in terms of compliance and for required levels of training and certification and watchkeeping arrangements due to innovation in technology;
.7 address the special character and circumstances of short sea shipping and the offshore industry; and

.8 address security-related issues.

Scope of the Proposal

3 In the review of chapters V, VI and VIII the ITF has taken into consideration the outcomes of the discussions of STW 38 and documents STW 39/7/7, STW 39/7/9, STW 39/7/13, STW 39/7/14 and STW 39/7/23 submitted to this session.

4 The comments and proposals contained in annexes 1, 2 and 3, where they express agreement to these other submissions, to prevent unnecessary repetition have not been resubmitted in full and only new amendments and additions have been included.

Action requested of the Sub-Committee

5 The Sub-Committee is invited to consider the proposals contained in annexes 1, 2 and 3 and take action as appropriate.
ANNEX 1

MANDATORY MINIMUM REQUIREMENTS FOR CERTIFICATION MASTERS OFFICERS AND DYNAMIC POSITIONING OPERATORS ON VESSELS USING DYNAMIC POSITIONING

1 Dynamic positioning has become increasingly important on a wide range of ships from passenger ships to offshore and dive vessels. The equipment used is extremely sophisticated and the level of technology requires skills quite unique from those otherwise required by a ship’s officer.

2 With the adoption by the IMO of guidelines for vessels with dynamic positioning (DP) systems contained in MSC/Circ.645 in June 1994, the following three basic classifications of DP operations were recognized:

.1 Class 1 – Automatic and manual position and heading control under specified maximum environmental conditions;

.2 Class 2 – Automatic and manual position and heading control under specified maximum environmental conditions, during and following any single fault excluding loss of compartment (two independent computer systems); and

.3 Class 3 – Automatic and manual position and heading control under specified maximum environmental conditions, during and following any single fault including loss of a compartment due to fire or flood. (At least two independent computer systems with a separate backup system separated by A60 class division).

3 The industry and manufacturers responded with training courses for DP operators and technicians, however these were often specific to the equipment supplied. A limited number of colleges and notably the Nautical Institute set up courses for DP operator certificates that, whilst in compliance with the requirements of the supplier, considered all classes of operation.

4 The basic course set-up should cover:

.1 principles of DP;

.2 elements of the DP system;

.3 practical operation of the DP system;

.4 position reference systems;

.5 environment sensors and ancillary equipment;

.6 power generation and supply and propulsion; and

.7 DP operations.
5 The simulator/advanced course incorporates the basic skills and lessons learnt in operation and should cover the following topics:

.1 practical operation of the DP system;

.2 DP operations; and

.3 DP alarms, warnings and emergency procedures.

6 DP watchkeeping experience requires not only the rank the DP operator was in at the time the experience was gained but also the class of vessel it has been gained on. Operators only operating on a Class 1 vessel will only be able to apply for a limited certification. There are also reductions in DP time required with intensive simulator training.

7 This certification system set up by the Nautical Institute can be seen as industry best practice and there are a number of other options in other countries that may also provide suitable training. The ITF, however, is not aware of details of these courses or their applicability with different manufacturers’ systems.

8 The ITF recognizes that the crew of offshore vessels are often employed for relatively short periods on any one vessel and operate in many different areas of the world. They may work on vessels with a different DP class, various equipment and configurations and with an assortment of company operational requirements.

9 Given the sophistication of the modern DP operation and the diversification of its use the ITF considers that the generic training competency standards should be included in the STCW Convention ensuring a minimum international standard that is easily recognized and totally transportable.

10 The ITF calls on the industry and training establishments that are currently actively involved in determining training and competency standards for DP operators to submit these standards for the Sub Committee’s consideration.

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ANNEX 2

PROPOSED AMENDMENTS TO CHAPTER VI OF THE STCW CONVENTION AND THE STCW CODE

CHAPTER VI

Emergency, occupational safety, medical care and survival functions

Regulation VI/[…]

Mandatory minimum requirements relating to sanitation and hygiene

1 With the recent, very public, instances of onboard outbreaks of virus and bacterial related illnesses affecting the health of crew and passengers it is evident that not all staff are aware of the dangers or that all measures have been taken. Whilst this becomes a very public problem on passenger ships, it is of no less importance on cargo vessels where incidents go unreported.

2 Seafarers designated duties with respect to the handling of food or the operation and maintenance of the sanitation systems should have a full understanding of the risks and best practices. The references within the ILO Maritime Labour Convention of only generic and needs practical standards to be established.

3 The ITF proposes a set standards be formulated in A.VI/5 in consultation with the ILO and WHO and call for the industry to submit any current training programmes for the consideration of the Sub-Committee on:

   \1 Handling of food;
   \2 Storage of food;
   \3 Disposal of waste;
   \4 Bacteria and viruses associated with food;
   \5 Requirements of MARPOL’s Annex V; and
   \6 Personnel hygiene for those dealing with food or waste.

4 With the minimum manning of the modern vessel, any debilitating illness of a large number of the crew constitutes a safety risk to the ship and the environment and should be given equal consideration to all other measures taken.

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ANNEX 3

COMMENTS ON THE PROPOSED AMENDMENTS TO CHAPTER VIII OF THE STCW CONVENTION AND THE STCW CODE

1 The ITF fully supports the submission Austria et al (STW 39/7/9) and the amendments proposed to harmonize the ILO provisions for work and rest hours and the requirement for the recording of hours in the STCW regulation and code with the following amendments.

Regulation VIII/1

Fitness for duty

1.2.1 establish and enforce for seafarers performing watch-keeping and operational duties, prevention of pollution and security duties, ….

Section VIII/2

Watchkeeping arrangements and principles to be observed

2 The ITF supports the proposal by Singapore (STW 39/7/7) and related proposals by the United States (STW 39/7/14, annex 6) and Norway (STW/39/7/23). We agree that the key elements of both Bridge Resource Management and Engine Resource Management need to be a mandatory requirement. We also propose there should be a full consideration of the requirements for Integrated Navigation System and Integrated Bridge System as contained in circular SN.1/Circ 265. We also agree with the removal of the outdated requirements from the standards as outlined in STW 39/7/23.