PROPOSED REVIEW OF STCW PASSENGER
SHIP SPECIFIC SAFETY TRAINING

Review and revision of training requirements for passenger ships

Submitted by the International Transport Workers Federation (ITF)

SUMMARY

Executive summary: This document provides comments on document HTW 1/13 submitted by the United States, which proposes a review and revision of the training requirements for passenger ships.

Strategic direction: 5.2

High-level action: 5.2.2

Planned output: 5.2.2.2

Action to be taken: Paragraph 10

Related documents: MSC 73/4/2, MSC 73/INF.3; MSC 81/19/7; MSC 90/27, MSC/90/27/4; MSC 91/WP.8, MSC 91/22 and MSC 92/6/4

Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the Guidelines on 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.4/Rev.2), and provides comments on document HTW 1/13 submitted by the United States on the proposed review and revision of the training requirements for passenger ships.

Comments

2 The ITF strongly supports the proposal for a review and revision of the STCW Code, chapter I, section A-I/14, set out in annex 1, regulation V/2 and section A-V/2 set out in annex 2 of document HTW 1/13.

3 The ITF fully agrees with facts that have been introduced in document HTW 1/13, especially in paragraph 6 and made similar comments in document MSC 92/6/4 (ITF) on evacuation analysis. ITF strongly supports the need to ensure training for all crew members in accordance with their duties and responsibilities but this should not only be those with a
prescribed duty on the muster list as required in annex 2, paragraphs 4 and 6, as this will encourage a pool of untrained employees that are part of a problem rather than the solution to effective evacuation of passengers.

4 As outlined in paragraph 7, an emergency situation can become "chaotic" and it is likely that passengers will turn to "any" crew member for assistance, irrespective of their duties and responsibilities. Therefore, the ITF supports the United States proposal that there is a need to ensure that all crew members and personnel on board passenger ships receive basic emergency training commensurate with their duties and responsibilities so that they can act in an effective manner during an emergency.

Proposal

5 The ITF shares the concerns expressed in paragraph 9 of document HTW 1/13, that certain training guidance that is important for masters and deck officers of all passenger vessels was excluded, specifically, the guidance found in existing paragraphs 2.1 and 2.3 of section B-I/14. Following the Costa Concordia incident, the ITF proposes that an in-depth review should be done of all requirements and guidance for Masters and officers applicable specifically prior to, and in, a crisis situation.

6 ITF concurs with the proposed three-level training structure to cover all crew and all personnel on board passenger ships and that they should receive some form of specialized training in accordance with their duties and responsibilities as set out in paragraphs 10.1 and 10.3 of document HTW 1/13. The ITF is, however, concerned as to what amendments are proposed by the United States regarding paragraph 9 to make chapter V "competency based".

7 With respect to annex 2, paragraph 1, regulation V/2 stating that "Administrations shall determine the applicability of these requirements to personnel serving on passenger ships engaged on domestic voyages" ITF cannot support inclusion of new wording "engaged on international voyages" in the proposed draft amendments to STCW Convention chapter V, regulations V/2.2 and V/2.5, in annex 2 of document HTW 1/13.

8 The ITF cannot support deletion of human behaviour from the title of the regulation in section A-V/2 as we believe that it is one of the most important issues that seafarers are required to have as knowledge, understanding and proficiency in training for passenger ships. For the reasons given in HTW 1/13, paragraphs 6 and 7, the appreciation of human behaviour in an emergency situation and the competence of all staff to assist passengers in a fire or evacuation are critical to passenger safety.

9 Further to the proposed annex 2, paragraphs 4 and 6 of document HTW 1/13 in regard to the new suggested text on basic emergency training, ITF could not agree with the diminution of the need for all crew members and other personnel to be appropriately trained, to only on those designated on muster list to assist passengers in emergency situations. The appropriate wording should be "Master, crew an all other personnel serving on passenger vessels engaged on international voyages shall have completed basic training as specified in section A-V/2".

Action requested of the Sub-Committee

10 The Sub-Committee is invited to consider the above proposals and take action as appropriate.