



SUB-COMMITTEE ON STANDARDS OF
TRAINING AND WATCHKEEPING
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Agenda item 7

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COMPREHENSIVE REVIEW OF THE STCW CONVENTION AND THE STCW CODE

Review of chapter III of the STCW Convention and the STCW Code

Submitted by the International Transport Workers' Federation (ITF)

SUMMARY

Executive summary: This document puts forwards proposals for amendments to chapter III 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 81/25, STW 29/7/4, STW 39/7/10, STW 39/7/12 and STW 38/7

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- .4 address inconsistencies, interpretations, MSC instructions, clarifications already issued, outdated requirements and technological advances;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 chapter III, the ITF has taken into consideration the outcomes of the discussions of STW 38 and documents STW 39/7/4, STW 39/7/10 and STW 39/7/12 submitted to this session.

4 The proposals contained in the annex, 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 the annex and take action as appropriate.

ANNEX

**COMMENTS ON THE PROPOSED AMENDMENTS TO CHAPTER III OF THE
STCW CONVENTION AND THE STCW CODE****CHAPTER III - Engine Department****Regulation III/1**

Mandatory minimum requirements for certification of officers in charge of an engineering watch in a manned engine-room or designated duty engineers in a periodically unmanned engine-room.

1 The review stated in STW 38/17, annex 11, paragraph 22, that it is to ensure that education and training requirements in regulation III/1 are based on meeting the standards of competences and in accordance with principle .4, as above, i.e. inconsistencies, interpretations, etc. However, we should also take into consideration that any review does not ignore principle .2, as above, and not involve downscaling or downscaling of current competencies to address current shortages.

2 In considering if the time constraints contained in III/1 are inconsistent with other sections within chapters II and III we must note that every section has significant sea service components as well as the designated competencies within the standards. This indicates that in the 1995 review the Committee were conscious that an essential element of the competencies required was the experience gained in service onboard or in relevant areas where the required skills could be acquired.

3 Unlike the skills required in II/1 the trainee engineer needs to accumulate much of their knowledge and basic skills in areas other than a ship environment. Simulators and modern technology were taken into consideration in the 1995 review with a subsequent reduction in training time and administrations are assessing a wide variety of training schemes so that they comply with the generic minimum requirements of regulation III/1. Training of engineers may include apprenticeships or cadet schemes and with academic standards including graduates, undergraduates, foundation degrees, diplomas and marine college or academy courses. In practice training periods range from three to four years with the increasing legislation and technology putting strain on the current course time.

4 We therefore do not support the amendments contained in Austria *et al* (STW 39/7/10) and Iran (STW 39/7/4) with the removal of a 30-month minimum requirement and the introduction of a new option of a 12-month joint seagoing and workshop service. The current provision is entirely consistent with the methodology of all other clauses within chapters II and III and the reduction to 12 months would not recognize the current practice, the realistic requirements to ensure a fully trained engineer and would breach the undertakings of principle .2, i.e. downscaling the training of ships engineers.

Regulation III/6 (Proposed new regulation)

Mandatory minimum requirements for certification of electro-technical officer

5 As more of the traditional skills of the past were incorporated into the training of engineers the position of electricians was phased out and in theory the new technology was sufficiently advanced not to require continuous attention of a specialist. However, there has in the last decade, particularly on specialist ships, been major technological advances in the field of electronics and computers and due to minimum of manning, vessels are increasingly reliant on efficient operation of this technology. The skills required for this role are not only very new and highly sophisticated but are also constantly evolving.

6 Many owners now choose to have an electro-technical officer onboard operating in the engine room department but responsible for a wide range of equipment throughout the vessel. In many instances this will involve the operation of a high voltage electrical power plant, however the safety responsibility remains totally with the engineer in charge. There is no internationally transportable and recognizable certificate of competency and the general appreciation and integration of this position into the vessels maritime and environmental safety has not been addressed.

7 Most passenger ships, cruising and offshore vessels will have at least one electro-technical officer as will diesel-electrical vessels. Vessels with their own cranes may also require this position.

8 The ITF supports the paper Bulgaria *et al* (STW 39/7/12) proposing an electro-technical officer and the competencies set out in annex 2 and 3 of the document. We do have concerns however that the provisions contained in annex 1 under chapter III, paragraph 2.2 will not enable the proper training of this specialist officer.

9 The subsequent provision suggested for regulation I/14, Responsibilities of companies is unnecessary as like any other position within the Convention it is not required unless the owner and flag State require it within the minimum manning certificate. The competency standards would be mandatory, not the position.

Regulation III/7 (Proposed new regulation)

Mandatory minimum requirements for certification of senior electro-technical officer

10 This position should have a higher academic and practical ability in electronics and more managerial responsibilities.
