



SUB-COMMITTEE ON STANDARDS OF  
TRAINING AND WATCHKEEPING  
41st session  
Agenda item 7.6

STW 41/7/52  
6 November 2009  
Original: ENGLISH

## COMPREHENSIVE REVIEW OF THE STCW CONVENTION AND THE STCW CODE

### Regulation VI/1, section A-VI/1 and section B-VI/1

Submitted by the International Shipping Federation (ISF) and the  
International Transport Workers' Federation (ITF)

#### SUMMARY

<i>Executive summary:</i>	This document comments upon inconsistencies within the proposed text of the STCW Convention and Code concerning safety training and security-related training and proposes a solution
<i>Strategic direction:</i>	5
<i>High-level action:</i>	5.2
<i>Planned output:</i>	5.2.2.1
<i>Action to be taken:</i>	Paragraph 7
<i>Related documents:</i>	STW 40/7/39; STW 41/7/6 and MSC.1/Circ.1235

#### Background

1 The principles of the review of the STCW Convention and STCW Code were identified at STW 38 in February 2007. One of these was to address inconsistencies in the Convention and Code.

2 STW 41/7/6 contains draft amendments to chapter VI of the Convention and its associated Code provisions, to include requirements and guidance on security-related training in accordance with the International Ship and Port Security Code (ISPS).

3 STW 40/7/39, submitted by ISF, explained the ISF's concerns that the structure of the proposed amendments in respect of security-related training was inconsistent with the structure of the requirements for safety training. The latter state that, whilst familiarization training is required for all shipboard personnel, basic training is necessary only for those seafarers assigned designated safety and pollution prevention duties. However, the proposed text provides that all seafarers will require both familiarization and basic security-related training. It also provides for all seafarers to receive security awareness training. This concept originates from the ISPS Code and has no equivalent in respect of safety training.

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4 In general, the level of security awareness training and the security familiarization training is comparable to the level of safety familiarization training. The difference is that the awareness training can be generic but the familiarization training is ship-specific. The awareness training could, for example, be delivered ashore. However, the ship-specific familiarization training must be delivered on each ship on joining, in line with the requirements for safety familiarization. The training for those with designated security duties is comparable to that of basic safety training, such as personal survival techniques, which is required for those with designated safety or pollution prevention duties.

### **Proposal**

5 ISF acknowledges that the STCW Convention and Code must reflect the stipulations of the ISPS Code. For this reason, taking into account the requirement for security-related awareness training, ISF considers that provisions as to security-related training should not be inserted into regulation VI/1, as proposed in STW 41/7/6, but instead be covered in a separate regulation. This would permit regulation VI/1 and associated Code provisions to remain concerned exclusively with safety training and avoid fitting security-related training into an unsuitable structure.

6 The co-sponsors propose that the requirements concerning security-related training be placed in regulation VI/6, section A-VI/6 and section B-VI/6. These should set out the requirements for all seafarers to achieve the minimum standards of competence in security awareness currently specified in draft table A-VI/1-5 and to receive security-related familiarization training. They should also set out the mandatory minimum requirements for seafarers with designated security duties as currently specified in draft section A-VI/6, along with a statement setting out an Administration's power to apply exemptions where appropriate and transitional provisions. Annex 1 illustrates the proposal in tabular form.

### **Action requested of the Sub-Committee**

7 The Sub-Committee is requested to consider the suggestions outlined in paragraphs 5 and 6 and take action as appropriate.

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## ANNEX

**PROPOSED AMENDMENTS TO REGULATIONS VI/1 AND VI/6,  
AND SECTIONS A-VI/1, A-VI/6, B-VI/1 AND B-VI/6**

<b>Regulation VI/1</b>	
Paragraphs 2 and 3	To be moved to regulation VI/6.

<b>Regulation VI/6</b>	
Title	Insert New Title : Security related training Existing title to become subtitle after paragraph 3
New paragraph 1	Insert slightly amended version of text of paragraph 1 of regulation VI/1 <i>Seafarers shall receive security familiarization and awareness training or instruction in accordance with section A-VI/6-1 of the STCW Code and shall meet the appropriate standard of competence specified therein</i>
New paragraph 2	Insert text moved from VI/1, paragraph 2
New paragraph 3	Insert text moved from VI/1, paragraph 3
Existing paragraph 1	To be renamed as paragraph 4 References to section A-VI/6 to be amended to references to section A-VI/6-2
Existing paragraph 2	To be renamed as paragraph 5
Existing paragraph 3	To be renamed as paragraph 6 References to section A-VI/6 to be amended to references to section A-VI/6-2

<b>Section A-VI/1</b>	
Paragraphs 1-1 to 1-3	To be moved to section A-VI/6
Paragraphs 2-1 and 2-2	To be moved to section A-VI/6
Paragraph 3	Delete reference to paragraph 2-1
Table A-VI/1-5	To be moved to section A-VI/6

<b>Section A-VI/6</b>	
Title	Insert New Title : Security related training Existing title to become subtitle after paragraph 2-2
New paragraphs 1-1 to 1-3	Insert text moved from section VI/1, paragraphs 1-1 to 1-3
New paragraphs 2-1 and 2-2	Insert text moved from section VI/1, paragraphs 2-1 and 2-2 Title to be renamed Security related awareness training References to table A-VI/1-5 to be amended to references to table VI/6-1 In paragraph 2-1.1, delete “basic” before training
New paragraph 3	Insert copied text of paragraph 3 of section A-VI/1 Delete references to paragraphs 1-1 and 1-2
Existing paragraphs 1 to 4	To be renamed as paragraphs 4-1 to 4-4 References to table A-VI/6 to be amended to references to table A-VI/6-2
New table A-VI/6-1	Insert table A-VI/1-5 moved from section A-VI/1 and to be renamed as table A-VI/6-1
Existing table A-VI/6	To be renamed as table A-VI/6-2

<b>Section B-VI/1</b>	
Paragraphs 9 to 12	To be moved to section B-VI/6

<b>Section B-VI/6</b>	
Title	Insert New Title : Security related training Existing title to become subtitle after paragraph 4
New paragraphs 1 to 4	Insert text moved from section B-VI/1, paragraphs 9 to 12 References to regulation VI/1 and section A-VI/1 to be amended to references to regulation VI/6 and section A-VI/6
Existing paragraphs 1 to 4	To be renamed as paragraphs 5 to 8

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