

SUB-COMMITTEE ON STANDARDS OF  
TRAINING AND WATCHKEEPING  
44th session  
Agenda item 17

STW 44/17/6  
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## ANY OTHER BUSINESS

### Training requirements on board ships using natural gas or other low-flashpoint fuels

#### Submitted by the International Transport Workers Federation

#### SUMMARY

*Executive summary:* This document provides comments on documents STW 44/17/2, STW 44/17/3 and STW 44/17/4 relating to training requirements for officers and crew on board ships using low-flashpoint fuels, and proposals to amend the STCW Convention and Code accordingly

*Strategic direction:* 5.2

*High-level action:* 5.2.2

*Planned output:* No related provisions

*Action to be taken:* Paragraph 9

*Related documents:* STW 44/17/2, STW 44/17/3, STW 44/17/4; BLG 17/INF.11; BLG 16/16 and STW 44/INF.5

#### Background

1 This document is submitted in accordance with paragraph 6.12.5 of *the Guidelines on 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 documents STW 44/17/2, STW 44/17/3 and STW 44/17/4.

2 BLG 16, in considering whether specific training requirements for gas and chemical tankers already in place were suitable for officers and crew serving on ships fuelled by gas or low-flashpoint fuels, had agreed that it was premature to include any training requirements in chapter 18 of the draft International Code of safety for ships using gas or other low-flashpoint fuels (IGF Code). Accordingly, BLG 16 had requested that the STW Sub-Committee consider chapter 18 of the draft IGF Code and provide guidance on any training requirements for inclusion in the draft Code being developed.

3 As currently there are no mandatory training requirements for personnel serving on board ships using low-flashpoint fuel and since resolution MSC.285(86) on *Interim guidelines on safety for natural gas-fuelled engines installations in ships*, which includes provisions for

training, and leaves these requirements to the Administration to decide, the ITF recognizes the need to develop mandatory training requirements for the officers and crew serving on ships fuelled by gas or low-flashpoint fuels.

### **Discussion**

4 Overall the ITF is not confident that all the risks to seafarers and passengers on ships fuelled by gas or low-flashpoint fuels have been fully considered particularly where the fuel is bunkered and stored in the vicinity or under the accommodation. It is our opinion that even the outcomes of the HAZID report BLG 17/INF.11 underestimated the risks of collision, grounding and the evacuation of a vessel when gas is a factor in way of the accommodation. Without the benefit of a full FSA, it is premature to sanction the construction of vessels with gas tanks in this area or formulate provisions of training that are less than those required currently for gas carriers.

5 The proposal contained in STW 44/17/2 by the United States, envisages a greatly reduced mandatory training requirement than currently for gas and chemical tankers based on the wider scope of cargoes gas carriers have to deal with. However, discussions at BLG have not been confined to the use of natural gas and envisage other low-flashpoint fuels in the future being covered by the current amendments. BLG also has recognized that there is a higher risk in bunkering gas than loading cargoes.

6 In the submission by Norway STW 44/17/3, they propose a more generic training regime that should form part of the basic training for seafarers. We are aware of the problems there are in employing and retaining suitably skilled LNG crew, and we cannot see that making this a basic requirement for all officers could be a solution to a better safety culture. The training for low-flashpoint gas-fuelled ships should remain specific to the ship and include a similar period of onboard training to that required for gas tankers.

7 In the proposal by Denmark STW 44/17/4, it refers to the outcomes of a European LNG Project and two specific recommendations, 15a and 15b. The first recommends that the training criteria of gas carriers be changed based on the smaller amounts to be handled on ships fuelled by gas. This has no sensible basis, as the risks and safety requirements may be far greater using double bottom and side tanks by the accommodation than those incurred by gas cargo tankers. The second while once again referring to shortage of specifically trained crew, suggested a revised and supposedly much shorter training period. At the STW review, recently completed, the shortened training periods were hotly debated and although an intensive training option was agreed eventually, many still are against "quick courses" when it comes to safety.

8 There are still many areas of safety in the operation of ships fuelled by low-flashpoint fuels and with gas tanks in the vicinity of the accommodation, in particular with respect to containment, protection from collision and evacuation of personnel. Whilst we accept that ships of this type are currently being built subject only to the provisions of national administrations and there is urgency for mandatory legislation, training of the crews should err on the safe side and we should not have to improve standards at a later date after negative experiences.

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

9 The Sub-Committee is invited to consider the above information and, take action, as appropriate.