

SUB-COMMITTEE ON HUMAN ELEMENT,
TRAINING AND WATCHKEEPING
1st session
Agenda item 17

HTW 1/17/2
3 January 2014
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**DEVELOPMENT OF THE INTERNATIONAL CODE OF SAFETY FOR SHIPS
USING GASES FOR LOW FLASH-POINT FUELS (IGF CODE)**

**Development of training and certification requirements for seafarers
for ships using gases or low flash-point fuels**

Submitted by the International Transport Workers Federation (ITF)

SUMMARY

Executive summary: This document provides comments on document HTW 1/17, that contains the report of the Correspondence Group on development of training and certification requirements for seafarers on board ships subject to the International Code of safety for ships using gases or low flash-point fuels (IGF Code)

Strategic direction: 5.2

High-level action: 5.2.1

Planned output: 5.2.1.2

Action to be taken: Paragraph 6

Related documents: STW 44/17/2, STW 44/17/3, STW 44/17/4, STW 44/17/5, STW 44/17/6, STW 44/17/WP.3, STW 44/19, STW 44/INF.6 and MSC 92/26

Introduction

1 This document is submitted in accordance with paragraph 6.12.5 of the *Guidelines on the organization and method of work of the Maritime Safety Committee and the Marine Environment and Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.4/Rev.2) and provides comments on the report of the Correspondence Group on the development of training and certification requirements for seafarers on board ships subject to the International Code of safety for ships using gases or low flash-point fuels (IGF Code) (document HTW 1/17).

Comments

2 In document STW 44/17/6 (ITF), the ITF expressed concern at the wide range of gases covered under the IGF Code with various characteristics and totally different carriage requirements. In paragraph 7, the report recognizes this when taking into account existing

training and experience stating that it must be "at the same level and the same gases" and the shipboard systems can differ substantially aboard ships subject to the IGC Code. The ITF expresses the view that this is not fully reflected in the draft interim guidance and it is unclear that any Certificate of Proficiency under paragraph 5 of annex 1 may be gas-specific.

3 With regard to the decision in paragraph 6 to have only two tiers of training, whilst the ITF would not disagree in principle with this as long as there are clear requirements for ship specific familiarization, the ITF considers that all crew should have basic training. To this end the ITF would propose to amend the title in annex 2 for chapter V, section A-V/3 to "Basic training of personnel aboard ships subject to the IGF Code."

4 In annex 1, paragraph 6.2, it is clear that approved seagoing service period of at least three months is required and a minimum of three bunkering operations is required in the training period. In the onboard training programme in annex 3, paragraph 13, it states "if three loadings cannot be achieved within the one month period on board, it may be extended until the criteria has been satisfactorily achieved." The ITF considers the training period of three months should not be reduced even where there is a specific onboard training programme and the only reduction should be based on the correct previous experience on IGC vessels.

Proposal

5 The ITF is conscious of the dangers of operating with low flash-point gases or fuels on ships that do not have the sophistication or safety record as IGC Code vessels. The ITF believes that crew training must be of an equivalent level to that required for IGC vessels and we should give specific consideration to the problems of bunkers in the vicinity of accommodation and the subsequent challenges to crew in any evacuation or emergency situation. The ITF proposes greater consideration be given to the specific challenges to crew on different types of vessels and the various gases and fuels that can be used within the IGF Code.

Action requested of the Sub-Committee

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