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TRAINING AND WATCHKEEPING  
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Agenda item 7

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## COMPREHENSIVE REVIEW OF THE 1978 STCW CONVENTION AND CODE

### Comments on documents HTW 9/7, HTW 9/7/1 and HTW 9/7/3

Submitted by ITF

#### SUMMARY

*Executive summary:* This document provides comments on documents HTW 9/7, HTW 9/7/1 and HTW 9/7/3, which propose aims and principles for the comprehensive review and revision of the 1978 STCW Convention and Code.

*Strategic direction,  
if applicable:* 6

*Output:* 6.17

*Action to be taken:* Paragraph 14

*Related documents:* HTW 6/12/3, HTW 6/12/6; HTW 9/7, HTW 9/7/1, HTW 9/7/3; MSC 104/15/5, MSC 104/15/33, MSC 104/15/38 and MSC 105/20

#### Introduction

1 This document is submitted in accordance with paragraph 6.12.5 of 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.5/Rev.3) and provides comments on documents HTW 9/7, HTW 9/7/1 and HTW 9/7/3.

#### Background

2 MSC 105 agreed to include in the biennial agenda of the HTW Sub-Committee for 2022-2023 and the provisional agenda for HTW 9 an output on "Comprehensive review of the 1978 STCW Convention and Code", with a target completion year of 2026; it instructed the Sub-Committee to start with a preliminary assessment of the scope of the work to be conducted, identifying specific areas to be reviewed, and to prepare a road map for approval by the Committee before initiating the development of draft amendments.

3 MSC 105 also decided to prioritize the development and finalization of STCW training provisions on bullying and harassment in the maritime sector, including sexual assault and sexual harassment, as part of this output.

4 Document MSC 104/15/38 (ITF), recognized the need for a comprehensive review of the 1978 STCW Convention and Code and expressed the view that the establishment of a targeted review and revision mechanism would be the most effective way of amending these instruments on a continuous basis, as necessary, in order to keep up with the pace of technological, regulatory and operational developments.

### **Discussion**

5 Since the adoption of the 2010 amendments, events have shown that many changes to the technological, regulatory, and operational developments have occurred, the clear example being the MASS.

6 The previous 1995 and 2010 revisions of the STCW Convention and Code have demonstrated there have been human element problems with their implementation due to the limited capacity of established training facilities and consequential unrealistic timelines.

7 Consideration should be given to using existing and emerging technologies to develop remote and onboard training capability including built-in training programmes within equipment using new technologies to comply with STCW training requirements.

8 Whilst ITF agrees that there are benefits to the comprehensive review proposed by the submitters of document HTW 9/7, the position of ITF is that the STCW Convention and Code should remain baseline documents; the ITF is not in agreement with several aims and principles proposed in the document, which extends the comprehensive review or revision to the entire STCW Convention and Code.

9 Document HTW 9/7/1 addresses bullying and harassment, including sexual assault and sexual harassment and is aligned with ITF policy. There is a need for mutual respect in a safe environment free from bullying or harassment aboard ships. Awareness of the problem and the issues it creates should be part of mandatory training within the STCW Convention and Code.

### **Proposal**

10 ITF proposes consideration of documents HTW 9/7, HTW 9/7/1 and HTW 9/7/3 in a working group if established, and that a road map with aims and principles is developed as a way forward to a comprehensive review of the STCW Convention and Code.

11 During work on review, it should also include consideration on mandatory training on the prevention of bullying and harassment in the maritime sector including sexual harassment on board ships.

12 ITF proposes that the most effective way to keep up with the pace of technological, regulatory and operational developments is not a comprehensive review every decade or longer, but rather an overdue establishment of a targeted review for upcoming amendments and revision mechanism, which would allow any relevant amendments to be made to the STCW Convention and Code on a continuous basis, as needed. This will require an establishment of a mechanism that would allow for seafarers to comply without continuous shore-based training.

13 The comprehensive review and revision need to start now in order to achieve the proposed date of implementation in 2035. However, caution must be taken regarding the proposed entry-into-force date as it is clear that any revisions not performed at a date close to the implementation may be considered obsolete on their own, due to the fast pace of developments in the industry that may occur whilst the review is being undertaken.

**Action requested of the Sub-Committee**

14 The Sub-Committee is invited to consider the proposals in paragraphs 10, 11, 12 and 13 and take action as appropriate.

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