



SUB-COMMITTEE ON STANDARDS OF
TRAINING AND WATCHKEEPING
36th session
Agenda item 16

STW 36/16/5
18 November 2004
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ANY OTHER BUSINESS

Review of the STCW Code requirements regarding demonstration of competence

Submitted by the International Shipping Federation (ISF)

SUMMARY

Executive summary: ISF believes that there is no need to review or change the training requirements for STCW chapter VI, as this would lead to an unnecessary burden on seafarers and an inflexible restriction on shipowners' abilities to maintain well-trained crews. ISF believes that proper compliance with the ISM Code is the best way to ensure good training levels

Action to be taken: Paragraph 8

Related documents: STW 36/16/1 and MSC 78/24/6

1 This document comments on STW 36/16/1 by the Secretariat and is submitted in accordance with the provisions of paragraph 46.5 of the Guidelines of the Organization and Method of Work.

2 ISF notes the instruction from MSC 78 for STW 36 to consider the need for a review of the STCW chapter VI requirements, following the proposal from Norway to add refresher training for chapter VI (in MSC 78/24/6).

3 ISF believes that no changes are needed to the current chapter VI of STCW.

4 STCW provisions in regulation I/11 and section A-I/11 make it clear that additional refresher training and revalidation are only required for masters, officers and radio operators and that chapter VI is excluded. ISF thinks that this reflects a sensible view of STCW training requirements.

5 ISF is concerned that additional training in chapter VI will place a heavy burden on seafarers and shipowners when there may be no real need for such training.

6 In addition, the proposal that such refresher training for chapter VI should be approved would prevent shipping companies from being able to provide a flexible range of alternative training methods, such as in-house training, to best meet the requirements. This would lead to increased costs and disruptions to the seafarers' work and the shipping business.

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7 Where there is an issue with training levels, the ISM Code is in place to ensure that all crew members are adequately trained. ISF believes this is a much better way to maintain competence standards.

Action requested of the Sub-Committee

8 The Sub-Committee is invited to note the views expressed in this document and to agree that there is no need to change chapter VI training requirements, as proper enforcement of the ISM Code would be the best way to ensure well-trained crews.
