



SUB-COMMITTEE ON STANDARDS OF  
TRAINING AND WATCHKEEPING  
37th session  
Agenda item 17

STW 37/17/1  
25 October 2005  
Original: ENGLISH

## 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 is not required under the Convention and 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:** See paragraph 8

**Related documents:** STW 36/17, MSC 80/21/3 and MSC 80/24

1 ISF notes the instruction from MSC 80 for STW 37 to further 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 80/21/3).

2 ISF also notes, however, that the Committee acknowledged that this was a complex issue and that some delegations at MSC 80 expressed the opinion that there was no compelling need to review or amend STCW Code chapter VI requirements.

3 ISF agrees with the view of those delegations at MSC 80 and believes that no changes are needed to the current chapter VI of STCW. ISF also notes that at STW 36 a small majority did not support any changes to Chapter VI.

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.

7 Where there is an issue with training levels, the ISM Code (namely regulation 6.5) 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 paper 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.

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