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SUB-COMMITTEE ON STANDARDS OF
TRAINING AND WATCHKEEPING
37th session
Agenda item 7

STW 37/7/3
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MEASURES TO ENHANCE MARITIME SECURITY

Instruments to be reviewed and amended so as to include appropriate security-related provisions

Submitted by the International Shipping Federation (ISF)

SUMMARY

Executive summary: ISF believes that the proposal in STW 37/7/1 goes beyond what was envisaged when Ship Security Officer (SSO) competencies were developed. Security training for seafarers other than the SSO is most effectively undertaken through the existing arrangements under the ISPS Code. It is the Company Security Officer's (CSO) responsibility to see that the SSO ensures the seafarers on board are adequately trained and this is best done through the focused and ship specific security drills and training conducted by the SSO on board. If, however, it is felt that some amendments are needed to STCW, then ISF believes that general requirements could be added to the familiarization training provisions in section A-VI/1 of the STCW Code, and basic requirements could be added to the tables in chapters II and III of the STCW Code

Action to be taken: Paragraph 7

Related document: STW 37/7/1

1 This document comments on STW 37/7/1 by the United States 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 invitation from STW 36 to submit proposals on actions needed to identify instruments that need to be reviewed and amended as appropriate so as to include appropriate security-related provisions.

3 In that context, ISF has taken note of the proposal in STW 37/7/1 submitted by the United States to amend the STCW Convention to include training and certification requirements for all seafarers with or without security related responsibilities.

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4 ISF believes that this proposal is not appropriate, and that the proposed competency tables will not assist in improving security training. They are too detailed and onerous for all seafarers to have to undertake. Seafarers are not security professionals and the primary focus of their training and certification is the safe navigation and operation of the ship. They should not therefore be required to undertake training on such a range of topics, which can in any case be more usefully conveyed through focused, ship specific instruction on board by the Ship Security Officer (SSO).

5 Furthermore, in practice the most effective security training is done by the person familiar with the Ship Security Plan (SSP). Security knowledge and training varies depending on the ship type, trade, routes and so on. It is the responsibility of the Company Security Officer (CSO) to ensure that seafarers in the company are adequately trained (ISPS Code section A/11.2.9) and that those with security-related responsibilities have sufficient knowledge and ability to perform their duties (ISPS section A/13.3). This is done through the SSO, who then has the responsibility to ensure that adequate training is provided to shipboard personnel (ISPS section A/12.2.7). The SSO will do this through the conduct of shipboard drills and exercises.

6 ISF believes, however, that if a change is needed in the STCW Convention to ensure that all seafarers are aware of and able to fulfil any security-related responsibilities, then this can be achieved as follows:

- .1 for seafarers without security responsibilities (as set out in annex 1 of 37/7/1) there could be a general requirement of knowledge of the ship security plan and associated relevant issues contained within the familiarization training as required by STCW regulation VI/1 and section A-VI/1; and
- .2 for seafarers with security responsibilities (as set out in annex 2 of 37/7/1), and bearing in mind that it will be officers who will hold such responsibilities, basic requirements could be added to the tables in chapters II and III of the STCW Code, such as knowledge about the purpose of the SSP, knowledge of training and exercise requirements, and knowledge of procedures for carrying out the tasks set out in the SSP.

Action requested of the Sub-Committee

7 The Sub-Committee is invited to note the views expressed above and to decide as appropriate.