

SUB-COMMITTEE ON HUMAN ELEMENT,  
TRAINING AND WATCHKEEPING  
11th session  
Agenda item 6

HTW 11/6/25  
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## COMPREHENSIVE REVIEW OF THE 1978 STCW CONVENTION AND CODE

### Comments on document HTW 11/6

#### Submitted by ICS

#### SUMMARY

*Executive summary:* This document comments on the cumulative impact of adding additional training requirements following the decisions taken by the ISWG-STCW.

*Strategic direction, 6  
if applicable:*

*Output:* 6.17

*Action to be taken:* Paragraph 9

*Related documents:* HTW 10/10 and HTW 11/6

#### Introduction

1 This document is submitted in accordance with the provisions of 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.5) and comments on document HTW 11/6 (Report of the Intersessional Working Group on the Comprehensive Review of the STCW Convention and Code).

#### Background

2 The Intersessional Working Group on the Comprehensive Review of the STCW Convention and Code (the Group), guided by the aims, principles and methodology for the comprehensive review approved by the Committee, taking into account the list of specific areas identified, the non-exhaustive lists of the documents on proposals for amendments to the STCW Convention and Code, and topics for consideration, as set out in annex 8 to document HTW 10/10, and the documents received, was instructed to:

- .1 consider proposals on identified gaps and provisions that should be addressed;

- .2 evaluate the non-exhaustive lists of documents and topics to support the identification of gaps and provisions to be addressed;
- .3 based on the outcome of sub-paragraph .1 and .2, develop a preliminary list of gaps and provisions to be addressed;
- .4 prepare a work plan and recommendations to complete the review of all the provisions of the Convention and Code;
- .5 revise the road map, if necessary;
- .6 consider the draft MSC resolution on accessibility of information related to medical provisions in the STCW Convention set out in the annex to document HTW 10/6/9, with a view to approval by the Committee; and
- .7 submit a report to HTW 11.

### **Consideration of identified gaps and provisions to be addressed**

3 Having considered the proposals submitted to the Group, the Group prepared the list of identified gaps, as set out in annex 1 of HTW 11/6, and took actions as outlined in paragraphs 5 to 97 of HTW 11/6.

### **Cumulative impact of requirements for seafarer education, training and certification**

4 One of the principles of the comprehensive review, approved by MSC 107, was to:

- ".16 consider the cumulative impact of requirements for seafarer education, training and certification."

5 The Group agreed that the cumulative impact of adding additional training requirements for seafarers without removing any existing requirements was extremely concerning and could be detrimental to the recruitment and retention of seafarers and that additional discussion on this issue should be considered under a separate agenda item (HTW 11/6, paragraph 95).

6 ICS observed that the scope of the proposals submitted to the Group addressed a considerably more diverse range of disciplines. It is concerned that too broad scope would also result in an unmanageable burden on maritime education and training institutes to deliver the training and would adversely impact the quality of training. It would also reduce the attractiveness of careers at sea if the training time required to obtain a first Certificate of Competency were extended. Seafarer education and training should concentrate on specification and depth of knowledge, understanding and proficiency rather than width of disciplines.

7 ICS believes that an assessment of the cumulative impact of additional training proposals on seafarers and maritime education and training institutes alike must be considered prior to the commencement of the revision stage in accordance with the views and opinions agreed by the Group.

**Proposal**

8 ICS proposes that the Sub-Committee, having considered the discussion points in paragraphs 4 to 7 of this document, to:

- .1 recall principle 16 mentioned in paragraph 4 above for the comprehensive review of the 1978 STCW Convention and Code, approved at MSC 107;
- .2 recognize that a discussion of how to address the cumulative impact of new and additional requirements for training on seafarers and maritime education and training institutes has not taken place and must take place prior to proceeding to the revision stage;
- .3 agree to include "Assessment of the cumulative impact of requirements for seafarer education, training and certification" within the road map of the comprehensive review; and
- .4 request that the assessment identify an approach or practical criteria to manage the cumulative impact of training requirements, in accordance with the application of principle 16 mentioned in paragraph 4 above.

**Action requested of the Sub-Committee**

9 The Sub-Committee is invited to consider the proposals in paragraph 8, and take action, as appropriate.

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