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11th session
Agenda item 6

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COMPREHENSIVE REVIEW OF THE 1978 STCW CONVENTION AND CODE

Report of the Intersessional Working Group on the Comprehensive Review of the STCW Convention and Code

Note by the Secretariat

SUMMARY

Executive summary: This document provides the report of the first session of the Intersessional Working Group on the Comprehensive Review of the STCW Convention and Code.

*Strategic direction,
if applicable:* 6

Output: 6.17

Action to be taken: Paragraph 98

Related documents: HTW 10/10; MSC 108/20 and ISWG-STCW 1/WP.1

INTRODUCTION

1 The Intersessional Working Group on the Comprehensive Review of the STCW Convention and Code (the Group), chaired by Capt. Cathleen Mauro (United States), held its first meeting from 7 to 11 October 2024.

2 The Group was attended by delegations from the following Member States:

ARGENTINA
AUSTRALIA
BAHAMAS
BANGLADESH
BELGIUM
BRAZIL
CANADA
CHILE
CHINA
COLOMBIA
CYPRUS
DENMARK

EGYPT
ESTONIA
FINLAND
FRANCE
GERMANY
GHANA
GREECE
INDIA
INDONESIA
IRAN (ISLAMIC REPUBLIC OF)
IRAQ
IRELAND

ITALY
JAPAN
LATVIA
LIBERIA
LITHUANIA
MALAYSIA
MALTA
MARSHALL ISLANDS
MEXICO
NETHERLANDS (KINGDOM OF
THE)
NEW ZEALAND
NIGERIA
NORWAY
PAKISTAN
PANAMA
PHILIPPINES

POLAND
PORTUGAL
REPUBLIC OF KOREA
RUSSIAN FEDERATION
SAUDI ARABIA
SINGAPORE
SOUTH AFRICA
SPAIN
SWEDEN
SYRIAN ARAB REPUBLIC
THAILAND
TOGO
TÜRKİYE
UNITED ARAB EMIRATES
UNITED KINGDOM
UNITED STATES

by representatives from the following Associate Members of IMO:

FAROEES
HONG KONG, CHINA

by representatives from the following intergovernmental organizations in observer status:

EUROPEAN COMMISSION (EC)
INDIAN OCEAN MEMORANDUM OF UNDERSTANDING ON PORT STATE
CONTROL (IOMoU)

and representatives from the following non-governmental organizations in consultative status:

INTERNATIONAL CHAMBER OF SHIPPING (ICS)
INTERNATIONAL ASSOCIATION OF MARINE AIDS TO NAVIGATION AND
LIGHTHOUSE AUTHORITIES (IALA)
BIMCO
OIL COMPANIES INTERNATIONAL MARINE FORUM (OCIMF)
INTERNATIONAL FEDERATION OF SHIPMASTERS' ASSOCIATIONS (IFSMA)
INTERNATIONAL ASSOCIATION OF INDEPENDENT TANKER OWNERS
(INTERTANKO)
CRUISE LINES INTERNATIONAL ASSOCIATION (CLIA)
INTERNATIONAL ASSOCIATION OF DRY CARGO SHIPOWNERS
(INTERCARGO)
THE INSTITUTE OF MARINE ENGINEERING, SCIENCE AND TECHNOLOGY
(IMarEST)
INTERNATIONAL MARINE CONTRACTORS ASSOCIATION (IMCA)
THE ROYAL INSTITUTION OF NAVAL ARCHITECTS (RINA)
INTERFERRY
INTERNATIONAL TRANSPORT WORKERS' FEDERATION (ITF)
GLOBAL MARITIME EDUCATION AND TRAINING ASSOCIATION (GlobalMET)
THE NAUTICAL INSTITUTE (NI)

TERMS OF REFERENCE

3 The Group, guided by the aims, principles and the methodology of 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 as set out in annex 8 to document HTW 10/10 and topics for consideration, 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-paragraphs .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.

ADOPTION OF THE AGENDA

4 The Group adopted the agenda of the meeting, as set out in document ISWG-STCW 1/1.

CONSIDERATION OF IDENTIFIED GAPS AND PROVISIONS TO BE ADDRESSED

5 Having considered the proposals in the documents submitted under this agenda item, the Group prepared the list of identified gaps, as set out in annex 1, and took actions as outlined in paragraphs 6 to 95 below. In this regard, the Group noted that the proposals in the list would be moved forward with the understanding that the gaps identified in annex 1 would not be necessarily addressed in the manner proposed.

Articles

6 The Group, having noted the different acceptance procedures (explicit) for amendments to the articles in accordance with article XII(1)(a)(vi) of the Convention and its implications for the entry into force of said amendments:

- .1 agreed that addressing gaps identified in the articles by amending the articles themselves would not be feasible and should be avoided;
- .2 agreed that any gaps identified in the articles could be addressed through amendments to the annex to the Convention and/or associated parts of the Code; and

- .3 acknowledged that training and certification for MASS operators should align with the provisions of the STCW Convention and Code to maintain consistent training standards, noting that this alignment could be achieved through various mechanisms without needing to amend the articles.

7 During consideration of document ISWG-STCW 1/2/34 (India) in relation to expediting amendment process of the articles, the Group, having recalled the actions in paragraph 6 above, agreed not to include the proposal in the list of identified gaps to be addressed in the future.

Chapter I of the Convention and Code

Regulation I/1 and its corresponding parts of the Code

8 The Group agreed that regulation I/1 (Definitions and clarifications) and associated parts of the Code should not be considered until any amendments to other parts of the treaty had been agreed upon, as any necessary changes in definitions should be identified during the amendment process.

Regulation I/2 and its corresponding parts of the Code

9 The Group discussed confusion regarding the use of the term "endorsement", as used throughout regulation I/2, sections A-I/2 and B-I/2. The Group requested that the Secretariat provide a plain language clarification on when an endorsement should be issued.

10 During consideration of document ISWG-STCW 1/2/12 (INTERTANKO) in relation to the proposed additional notation for virtual classroom or cloud simulator into certificates, the Group, having agreed that the delivery method should not be of concern if the training course meets the requirements of the Convention and Code, did not agree to include the proposal in the gaps identified to be addressed in the future.

11 During consideration of documents ISWG-STCW 1/2/35 (India) and ISWG-STCW 1/2/46 (United Kingdom), in relation to the gaps identified in regulations I/2, V/2, V/3 and V/4, the Group agreed to include the proposal in the list of identified areas to be addressed in the future, as set out in annex 1 noting that the proposal was for correct cross-referencing purposes.

12 During consideration of document ISWG-STCW 1/2/11 (Austria et al.), in particular the specific proposal to add revalidation provisions in paragraph 1 of regulation I/2, the Group, having noted that existing regulation I/11 (Revalidation of certificates) was sufficient enough to address the matter, agreed not to include the specific proposal in the list of identified areas to be addressed in the future.

13 During consideration of document ISWG-STCW 1/2/25 (China), in particular the specific proposal to specify the content and format of the medical certificate in section B-I/2, the Group, having noted that section A-I/19 already covered information required for medical certificates, agreed not to include the specific proposal in the list of identified areas to be addressed in the future.

Deletion of regulation I/2.13.3

14 The Group considered the proposal to delete regulation I/2.13.3 in document ISWG-STCW 1/2/16 (United States). During discussion, concerns were expressed by several delegations for such deletion and a question was raised if amending regulation I/2 to delete paragraph 13.3 would contradict article VI of the Convention. In this context, the Group requested legal advice from the Secretariat and the following was provided to the Group:

While the existing regulation is clear in its intention to qualify for a medical certificate prior to the issuance of a certificate of competency, the possibility of introducing amendments to the annex to the Convention in order to delink the issuance of the CoC or CoP and the medical certificates could be done without conflicting article VI provided that the issuance of the medical certificate becomes a requirement to be met before assigning shipboard duties to the seafarer.

15 Following discussion, the Group agreed to include the specific proposal in the gaps identified to be addressed in the future, as set out in annex 1.

Regulation I/3 and its corresponding parts of the Code

16 During consideration of document ISWG-STCW 1/2/11 (Austria et al.), in relation to how to define near-coastal areas, the Group noted views expressed that the matter should be addressed by bilateral agreements between the Parties concerned and that including a process in the STCW Convention and Code went beyond the mandate of the Convention and Code. Therefore, the Group did not agree to include the specific proposal in the gaps identified to be addressed in the future.

Regulation I/4 and its corresponding parts of the Code

17 During consideration of document ISWG-STCW 1/2/11 (Austria et al.), in relation to the proposal to add the familiarization of seafarers on board into the scope of port State control inspections, the Chair of the Group noted that the *Procedures for port State control, 2023* (resolution A.1185(33)) established the scope of the PSC inspection, which was in accordance with regulation I/4 of the Convention and section A-I/4 of the Code. Following discussion, the Group agreed not to include this specific proposal in the list of identified areas to be addressed in the future, noting that such familiarization was addressed through the ISM Code and that the ISM Code was applicable only to ships of 500 gross tonnage or more.

Regulation I/6 and its corresponding parts of the Code

18 During consideration of document ISWG-STCW 1/2/26 (Singapore), in relation to establishing criteria for the qualification of the "qualified person" in regulation I/6.2, the Group, having noted that the matter should be left to the Administration and that adding any specific criteria would reduce flexibility, agreed not to include the specific proposal in the list of identified areas to be addressed in the future.

Regulations I/7, I/8 and I/16, and their corresponding parts of the Code

19 The Group discussed matters concerning the communication of information provisions, in particular the possibility of streamlining the oversight and verification processes set out in the STCW Convention and Code by integrating it in the IMO Member State Audit Scheme (IMSAS).

20 The Group noted the information provided by the Secretariat, including the challenges related to the implementation of said provisions (ISWG-STCW 1/2/47), as well as information on the framework, procedures and current status of developments of IMSAS, its relationship with the STCW communication of information provisions.

21 In this context, the Group had a general discussion on the possible options for improving the current system, e.g. enhancing the existing system, using IMSAS to streamline the STCW compliance and quality standard evaluation process, and developing a new oversight system.

22 During the discussion on the possible integration of the STCW oversight system in IMSAS, the Group noted the following views expressed:

- .1 partial amendments to the existing system would not address the current challenges in implementing the STCW oversight provisions;
- .2 developments of a new system would entail substantial resource implications, including the establishment of new administrative and financial frameworks to run the new system;
- .3 integrating the oversight system into the IMSAS would be the most effective way of enhancing the STCW oversight system;
- .4 the draft streamlined guidance on the communication of information provisions of the STCW Convention developed in previous sessions of the HTW Sub-Committee should have continued;
- .5 integration of the existing functions of the STCW oversight system into IMSAS would entail substantial changes to the STCW Convention and Code, and the IMSAS process;
- .6 IMSAS audit cycle was seven years, whereas the STCW independent evaluation cycle was five years. Such a shorter cycle for the STCW independent evaluation was justified to safeguard that Administrations were appropriately implementing their seafarer training systems, which were evolving rapidly, directly impacting seafarers' safety, etc., whereas IMSAS addressed implementation of treaty obligations more broadly;
- .7 integration of the schemes would add to the complexity of the IMSAS audit and it may also reduce focus or the stringency of the STCW evaluation process if integrated into a larger audit scope; and
- .8 the existing STCW oversight system was unstable and fragile due to its nature.

23 Following discussion, and recognizing that the current system was not sustainable in the long-term, the Group agreed that further consideration of the best option to enhance it was necessary. In this context, the Group invited:

- .1 the Sub-Committee to consider the options discussed at this meeting, with a view to revising regulations I/7, I/8 and I/16, as well as associated parts of the Code; and

- .2 interested Member States and international organizations to submit relevant documents addressing high-level policy options to HTW 11.

24 Furthermore, the Group agreed to gather all proposals in relation to the provisions for the communication of information and quality standards system in the STCW Convention and Code, i.e. regulations I/7, I/8 and I/16 and associated parts of the Code, as set out in annex 2, for consideration in the future.

Regulation I/9 and its corresponding parts of the Code

25 During consideration of document ISWG-STCW 1/2/44 (Canada), in relation to the shorter validity of medical certificates for seafarers under the age of 18, the Group, having noted that this provision was to protect vulnerable young seafarers, agreed not to include the specific proposal in the list of identified areas to be addressed in the future.

26 During consideration of document ISWG-STCW 1/2/10 (Austria et al.), in relation to alignment of the text in paragraph 6 of regulation I/9 with the relevant text in the MLC, 2006, the Group, having noted that medical practitioners should be recognized by a Party, agreed not to include the specific proposal in the list of identified areas to be addressed in the future.

27 During consideration of document ISWG-STCW 1/2/44 (Canada), in relation to the definition of a medical practitioner, the Group, having noted that the qualification of a medical practitioner should be left to the Administration to decide given the various systems in place for each Administration, agreed not to include the specific proposal in the list of identified areas to be addressed in the future.

Regulation I/10 and its corresponding parts of the Code

28 During consideration of document ISWG-STCW 1/2/20 (Philippines), in relation to additional means of confirming a Party had met the requirements of the STCW Convention for recognition of certificates, the Group, having noted that conduct of evaluation was the prerogative of the recognizing Party, agreed not to include the specific proposal in the list of identified areas to be addressed in the future.

29 During consideration of document ISWG-STCW 1/2/11 (Austria et al.), in relation to the expansion of the scope of evaluation for recognition of certificate to medical certificates, the Group, having noted:

- .1 medical certificates might be issued by different entities other than the maritime Administration;
- .2 the process for issuing medical certificates is covered by quality standards system; and
- .3 the delicate balance between levels of specificity and generality included in the existing provisions for recognition of certificates, which was intentionally provided to ensure flexibility of Parties in administering recognitions and endorsements,

agreed not to include the specific proposal in the list of identified areas to be addressed in the future.

Regulation I/11 and its corresponding parts of the Code

30 During consideration of document ISWG-STCW 1/2/11 (Austria et al.), in relation to the identification of types of certificates to which they refer, the Group, noting that the existing provisions were clear enough, agreed not to include the specific proposal in the list of identified areas to be addressed in the future.

31 During consideration of document ISWG-STCW 1/2/16 (United States), in relation to the incorporation of additional methods for demonstrating continued competence through the use of simulators into mandatory part A, the Group, having noted that the use of simulators to meet seagoing service requirements was only appropriate for first certificates of competency and for certificates of proficiency issued under chapter V, agreed not to include the specific proposal in the list of identified areas to be addressed in the future.

Regulation I/14 and its corresponding parts of the Code

32 During consideration of document ISWG-STCW 1/2/35 (India), in relation to the proposed new procedure to give onboard training to seafarers to continuously upskill and update their knowledge in section B-I/14, the Group, having agreed that the proposal would add unnecessary workload to seafarers, agreed not to include the specific proposal in the list of identified areas to be addressed in the future.

33 The Group, having agreed that the proposal in document ISWG-STCW 1/2/10 (Austria et al.) with a view to moving the guidance on the company's responsibility for a policy of drug and alcohol abuse in section B-VIII/1 to regulation I/14, noted the following views expressed:

- .1 the intent of regulation I/14 was to place responsibility on the company that the seafarers being employed by them were properly certificated, adequately familiarized with the ships' systems and that they were mentored, it was not to apportion responsibility on the company to develop policies related to work conditions, work environment etc.;
- .2 placing responsibility on companies on issues other than those already specified under regulation I/14 would create a confusing regulatory landscape for shipowners. Such proposed measures were correctly addressed within IMO's realm, under the effective implementation of the ISM Code; and
- .3 regulation I/14 had been the mechanism and link between the STCW Convention and the ISM Code, and it was part of a multi-pronged method to allow Administrations to ensure the safety of seafarers on board ships subject to the STCW provisions but not to other instruments.

34 Following discussion, the Group agreed to include this proposal in the list of identified gaps to be addressed in the future, as set out in annex 1.

Chapter II of the Convention and Code

Regulation II/1, sections A-II/1 and B-II/1

35 The Group, having considered the proposal in document ISWG-STCW 1/2/19 (ICS), in relation to mapping of competencies with IMO or other instruments, noted the following views expressed:

- .1 it might not be feasible to refer to all IMO instruments;
- .2 the proposal might be extended to other chapters;
- .3 chapter V was already based on specific instruments, e.g. the IGC Code and IGF Code;
- .4 different instruments should not downscale each other; and
- .5 the proposal would create inconsistencies and potential legal issues regarding Parties who may not be signatories to the referenced instruments.

36 Following discussion, the Group agreed to include this gap identified in document ISWG-STCW 1/2/19 in the list of identified areas to be addressed in the future, as set out in annex 1.

Simulation and seagoing service

37 With regard to the various proposals in relation to simulator training and seagoing service, the Group noted the following views expressed:

- .1 simulator training cannot cover the essence of shipboard experience, i.e. time-pressure management, multicultural training environment and movement of ships;
- .2 maximum period for simulator training/minimum period for seagoing service should be established;
- .3 careful consideration should be based on risk-based analysis;
- .4 flexibility should be given to the Administration;
- .5 simulator training can be applied only for initial certification for operational level and should not be used for qualifying for management level certificates and revalidation;
- .6 simulator training can be used for assessment;
- .7 clear criteria for equivalency should be established; and
- .8 simulator training should not downscale the existing requirements.

38 During discussion, the Group agreed that the use of simulators to meet a portion of seagoing service requirements was only appropriate for first issuance of certificates of competency at the operational level, for certificates of proficiency issued under chapter V and for revalidation.

39 Following discussion, the Group agreed to include all relevant gaps submitted to this session in the list of identified areas to be addressed, as set out in annex 1, taking into account the comments in paragraphs 37 and 38 above.

40 The Group, having considered document ISWG-STCW 1/2/11 (Austria et al.), in relation to inconsistencies in regulation II/1, noted the following views expressed:

- .1 existing provisions are clear enough and should not be overly prescriptive;
- .2 the provisions were intentionally drafted and were not in error; and
- .3 application should depend on the Administration.

41 Following discussion, the Group agreed not to include the proposal in the list of identified areas to be addressed in the future.

42 The Group, having considered document ISWG-STCW 1/2/44 (Canada), in relation to the unclear purpose of paragraph 2.6 of regulation II/1, noted the following views expressed:

- .1 this was intentional duplication to clarify that holders of CoC were not required to also hold CoPs concerned, which was decided during deliberations leading to the 2010 Manila Amendments;
- .2 there was a background for paragraph 2.6 and if agreed, the table should be amended, not the regulation itself;
- .3 relevant and proper competence was already in the table; and
- .4 COC can also serve as COP in the same certificate.

43 Following discussion, the Group did not agree to include the proposal in the gaps identified to be addressed in the future.

44 The Group, having considered document ISWG-STCW 1/2/31 (IALA), in relation to the proposed addition of reference to IALA guidance for the IALA Maritime Buoyage System, noted the following views expressed:

- .1 the proposed reference will be updated regularly and the update of the relevant KUP table is not feasible;
- .2 if the gap was agreed, this matter should be considered in part B rather than mandatory part A; and
- .3 model courses were outside the scope of the comprehensive review.

45 Following discussion, the Group agreed not to include the proposal in the list of identified areas to be addressed in the future.

46 The Group, having considered documents ISWG-STCW 1/2/2 (INTERTANKO) and ISWG-STCW 1/2/30 (Republic of Korea), noted the following views expressed:

Celestial navigation

- .1 celestial navigation should not be downscaled but should be modernized;

- .2 knowledge of celestial navigation was essential for fundamental navigation skills;
- .3 review of the existing provisions for celestial navigation should be undertaken taking into account current technologies and modernization;
- .4 review of the existing provisions for celestial navigation should take into account position fixing and determining compass errors;

Combining of bridge resource management and leadership/teamworking skills

- .5 elements of bridge resource management and leadership/teamworking skills are for different purposes so they cannot be combined; and
- .6 two elements have similar overlaps in terms of KUPs and engine-room resource management should be considered as well in combining with leadership/teamworking skills.

47 Following the consideration, the Group agreed to include the proposal in the list of identified areas to be addressed, as set out in annex 1, for further consideration.

48 The Group, having noted that provisions for single-letter signal flag correlate with the provisions of the COLREGS, hence removal of the provisions concerned would entail unintended consequences when considering document ISWG-STCW 1/2/1 (INTERTANKO), agreed not to include the proposal in the list of identified areas to be addressed in the future.

49 The Group, having considered document ISWG-STCW 1/2/14 (INTERTANKO), regarding mentoring for junior officers, noted the following views expressed:

- .1 there would be practical challenges to implementing provisions for mentoring on board;
- .2 demonstrating the proposed competence might not be practicable; and
- .3 review should include not only the management level but also operational level.

50 Following discussion, the Group agreed to include the proposal in the list of identified areas to be addressed, as set out in annex 1, in the next phase of the comprehensive review, taking into account the views above.

51 The Group, having considered documents ISWG-STCW 1/2/11 (Austria et al.) and ISWG-STCW 1/2/16 (United States) concerning the endorsement of limitations in certificates, agreed to include the proposals in the list of identified areas to be addressed, as set out in annex 1, under regulation I/2 and its corresponding parts of the Code.

52 The Group agreed to include the proposal in document HTW 10/6/6 (INTERTANKO), in relation to the proposal for a new competence on navigating in a Global Navigation Satellite System (GNSS) impacted environment, in the list of identified areas to be addressed, as set out in annex 1.

Regulation II/2, sections A-II/2 and B-II/2

53 The Group, having considered document ISWG-STCW 1/2/36 (India), relation to the proposed addition of tonnage specificity, noted the following views expressed:

- .1 determination of appropriate tonnage requirements to meet seagoing experience for certification should be left to the Administration;
- .2 experience as a chief mate was an indispensable step for certification as a master; and
- .3 the proposal correlates with provisions in chapter I therefore, if it was agreed to amend regulation II/2, chapter I should also be considered for amendments.

54 Following discussion, the Group agreed not to include the proposal in the list of identified areas to be addressed in the future.

55 The Group, having considered document ISWG-STCW 1/2/46 (United Kingdom), in relation to the seagoing service period for certification as a master, noted the following views expressed:

- .1 36 months of seagoing service provisions for master were clear; and
- .2 standard of competence for certification as a master and chief mate in section A-II/2 are identical.

56 Following discussion, the Group agreed not to include the proposal in the list of identified areas to be addressed in the future.

Competence and KUPs

57 The Group, having considered document ISWG-STCW 1/2/46 (United Kingdom), in particular the proposal in relation to the obligations in mass casualty and migrant rescue situations, noted the following views expressed:

- .1 there was already industry guidance on the operational aspect and legal obligation for mass casualty and migrant rescue situations;
- .2 SAR Convention already covered legal obligation in mass casualty and migrant rescue situations; and
- .3 demonstrating and evaluating new competence or KUP for legal obligations in mass casualty and migrant rescue situations are challenging.

58 Following discussion, the Group agreed not to include this specific proposal in the list of identified areas to be addressed in the future.

Regulation II/3, sections A-II/3 and B-II/3

59 The Group, having considered document ISWG-STCW 1/2/36 (India), in relation to possible misinterpretation of tonnage requirements, noted the following views expressed:

- .1 the proposal in the document was not a gap to be addressed during the comprehensive review; and
- .2 the proposal might entail unintended consequences.

60 Following discussion, the Group agreed not to include the proposal in the list of identified areas to be addressed in the future.

61 The Group, having considered document ISWG-STCW 1/2/19 (ICS), in relation to the proposed addition of a new competence for masters and officers on ships of less than 500 gross tonnage, noted the following views expressed:

- .1 the gap in the document was already covered by the existing requirements of regulation II/3, paragraphs 1 and 2 for "Ships not engaged on near-coastal voyages";
- .2 the requirements in paragraphs 1 and 2 of regulation II/3 were developed intentionally;
- .3 the proposal is contrary to Principle 2 of the comprehensive review as it would downscale existing minimum standards of training, certification and watchkeeping; and
- .4 requirements imposed to ships of less than 500 gross tonnage by other IMO instruments may be different for those of 500 gross tonnage or more, hence the proposal may entail unintended consequences.

62 Following discussion, the Group, having provided general support to the proposal, agreed to include it in the list of identified areas to be addressed in the future, as set out in annex 1.

63 The Group, having recalled the discussion in paragraph 12 above, agreed not to include the proposal in document ISWG-STCW 1/2/44 (Canada), in relation to the unclear purpose of paragraph 4.5 of regulation II/3 in the list of identified gaps to be addressed in the future.

Regulation II/4, sections A-II/4 and B-II/4

64 The Group, having considered document ISWG-STCW 1/2/36 (India), noted the following views expressed:

- .1 ratings under training and ratings whose duties while on watch are of an unskilled nature need not be certified in accordance with regulation II/4; and
- .2 existing requirements in regulation II/4, paragraph 1 were clear and do not require amending.

65 Following discussion, the Group agreed not to include the proposal in the list of identified areas to be addressed in the future.

66 The Group, having considered document ISWG-STCW 1/2/19 (ICS), noted the following views expressed:

- .1 the gap identified in the document was outside scope of each table and it can be addressed with familiarization required by regulation I/14; and
- .2 the FAL Committee established the *Guidelines on minimum training and education for mooring personnel* (FAL.6/Circ.11/Rev.1) and the proposal went beyond the scope of the comprehensive review.

67 Following discussion, the Group did not agree to include the proposal in the gaps identified to be addressed in the future.

Chapter III of the Convention and Code

68 The Group, having considered document ISWG-STCW 1/2/19 (ICS), noted the following views expressed:

- .1 regulation III/1 already required a minimum of six months of engine-room watchkeeping; and
- .2 flexibility should be given to the Administration to decide the duration of the workshop skills training.

69 Following discussion, the Group agreed not to include the proposal in the list of identified areas to be addressed in the future.

70 During consideration of document ISWG-STCW 1/2/25 (China) in relation to the proposed deletion of the application of "stress-calculating equipment" from the KUP in table A-III/1, the Group, having noted that engineer officers should have basic knowledge on the equipment, agreed not to include the proposal in the list of identified areas to be addressed in the future.

Chapter IV of the Convention and Code

71 During consideration of document ISWG-STCW 1/2/11 (Austria et al.), in relation to the clarification on whether section A-VI/1, paragraph 2 (basic training) should be met before certification as GMDSS radio operators, the Group noted that regulation IV/2 did not require meeting the provisions of section A-VI/1, paragraph 2 prior to certification whereas for chapters II and III it was required. In this context, the Group agreed that the existing requirements were clear and agreed not to include the proposal in the list of identified areas to be addressed in the future.

Chapter V of the Convention and Code

72 During consideration of document ISWG-STCW 1/2/39 (India), in relation to alternative methods of seagoing service requirements to be qualified for advanced training for oil tanker and liquefied gas tanker cargo operation, the Group, having noted that the proposal would downscale the existing requirements, did not agree to include the proposal in the gaps identified to be addressed in the future.

73 During consideration of document ISWG-STCW 1/2/25 (China), in relation to enhancement of emergency familiarization training of seafarers serving on ships operating in polar waters, the Group, having noted that the Polar Code chapter 12 already provides training requirements, agreed not to include the proposal in the list of identified areas to be addressed in the future.

74 During consideration of document ISWG-STCW 1/2/39 (India), in relation to the proposed new regulation in chapter V for persons working on board various other specific types of ships, particularly offshore vessels and units, the Group, having noted that the criteria for offshore units were unclear, did not agree to include the proposal in the gaps identified to be addressed in the future.

75 During consideration of document ISWG-STCW 1/2/39 (India), in relation to the proposed new regulation in chapter V for special training requirements for navigation of large vessels and vessels with unusual manoeuvring characteristics, the Group, having noted that the proposed training can be addressed under the existing provisions of regulation I/14 and associated parts of the Code, did not agree to include the proposal in the gaps identified to be addressed in the future.

76 During consideration of document ISWG-STCW 1/2/39 (India), in relation to proposed new regulation in chapter V for type rating officer and concept of type rating certificates for officers and crews of high-speed craft (HSC), the Group, having noted that the proposal went beyond the scope of the comprehensive review, did not agree to include the proposal in the list of identified areas to be addressed in the future.

77 During consideration of documents HTW 10/6/8 (Argentina et al.) and ISWG-STCW 1/2/45 (Norway), in relation to proposed additional training for all seafarers serving on board ships in polar waters, the Group agreed that additional training for all seafarers and not just deck officers was necessary. However, until the Polar Code was amended, new training would need to be added to the guidance in part B of the Code.

78 During consideration of documents ISWG-STCW 1/2/16 (United States), ISWG STCW 1/2/19 (ICS) and ISWG-STCW 1/2/39 (India), in relation to the moving of Dynamic Positioning Operator training from part B to part A (i.e. mandatory) of the Code, the Group, having noted some concerns on the potential safety effects of these proposals, agreed to include the proposal in the list of identified areas, as set out in annex 1, for further consideration on safety effects.

Chapter VI of the Convention and Code

79 Following the consideration of document ISWG-STCW 1/2/11 (Austria et al.), in relation to exemption requirements in section A-VI/1, paragraph 5, the Group, having noted that the existing provisions for exemptions need not be amended, agreed not to include the proposal in the list of identified areas to be addressed in the future.

80 Having document ISWG-STCW 1/2/25 (China), in relation to the provisions for medical first aid and medical care, the Group, having noted that guidance would be provided by another organization such as WHO for highly infectious diseases and psychological counselling is beyond the scope of medical care, did not agree to include the proposal in the gaps identified to be addressed in the future.

81 Following the consideration of document ISWG-STCW 1/2/11 (Austria et al.), in regard to medical care refresher training every five years, the following views were expressed;

- .1 medical care refresher training was generally considered best practice for medical professionals around the world; and
- .2 addition of requirements for medical care refresher every five years might add too much burden to seafarers

82 Nevertheless, the Group agreed to include the proposal in the list of identified areas to be addressed in the future, as set out in annex 1, for further consideration.

Chapters VII and VIII of the Convention and Code

83 Due to time constraints, the Group was unable to give detailed consideration to the gaps identified in chapters VII and VIII. Having noted that chapter VII and chapter VIII were specific areas 17 and 18 identified for the comprehensive review, as set out in annex 4 to document HTW 10/10, the Group gathered all the proposals in relation to the gaps identified in chapters VII and VIII, with a view to being further considered as a part of the comprehensive review.

Specific areas applicable to multiple chapters

Violence and harassment, including sexual harassment, bullying and sexual assault

84 During consideration of document ISWG-STCW 1/2/16 (United States), in relation to removal of known perpetrators from service in cases of violence and sexual assault, the Group, having noted that the proposal would conflict with national legislation, which varied by Parties, and hence should be left to the national legislation instead of being prescriptive in the STCW Convention and Code, agreed not to include the proposal in the list of identified areas to be addressed in the future.

85 During consideration of documents ISWG-STCW 1/2/22 (Philippines) and ISWG-STCW 1/2/44 (Canada), in relation to proposed amendments to the amendments to table A-VI/1-4 adopted by MSC 108 concerning violence and harassment, the Group, having noted that table A-VI/1-4 had been recently amended and adopted with thorough discussion with ILO, agreed not to include the proposal in the list of identified areas to be addressed in the future.

86 The Group, while agreeing to the proposed addition of provisions for company policies and procedures for prevention of and response to violence and harassment in regulation I/14, noted the following views expressed:

- .1 the intent of regulation I/14 was to place responsibility on the company that the seafarers being employed by them are properly certificated, adequately familiarized with the ships' systems and that they be mentored, it is not to apportion responsibility on the company to develop policies related to work conditions, work environment etc.;
- .2 placing responsibility on companies on issues other than those already specified under regulation I/14 would create a confusing regulatory landscape for shipowners. Such proposed measures are correctly addressed within IMO's realm, under the effective implementation of the ISM Code; and
- .3 the second meeting of the Joint ILO/IMO Tripartite Working Group to Identify and Address Seafarers' Issues and the Human Element (JTWG) held in February 2024 recommended that the Maritime Safety Committee consider the adoption of measures, applicable to Administrations and shipping companies worldwide, to address violence and harassment, including sexual harassment, bullying and sexual assault.

Mental health, psychological safety, and gender and cultural diversity

87 During consideration of document ISWG-STCW 1/2/10 (Austria et al.), in relation to the proposed addition of provisions to evaluate mental health medical standards, the Group, having noted that the proposal may have a negative effect on seafarers willingness to report medical conditions, and that the *Guidelines on the medical examination of seafarers* (STCW.7/Circ.19/Rev.1) dealt with mental health already, agreed not to include the proposal in the list of identified areas to be addressed in the future.

88 During consideration of documents ISWG-STCW 1/2/25 (China) and ISWG-STCW 1/2/30 (Republic of Korea), in relation to the proposed addition of requirements for conducting mental health assessment of seafarers prior to boarding or for monitoring the mental state of seafarers on board, the Group, having noted that the monitoring of seafarers' mental health by other seafarers was not feasible or within the scope of the seafarers' duties and responsibilities, agreed not to include the proposal in the list of identified areas to be addressed in the future.

89 During consideration of documents ISWG-STCW 1/2/25 (China) and ISWG-STCW 1/2/40 (India), in relation to the proposed addition of provisions for psychological counselling into medical care training requirements, the Group, having noted that psychological counselling is beyond the scope of shipboard medical care, agreed not to include the proposal in the list of identified areas to be addressed in the future.

90 During consideration of document ISWG-STCW 1/2/40 (India), in relation to the proposed addition of provisions for mechanism to cope in a crisis situation including maritime piracy or any incident related to maritime threats and hostility, the Group, having noted that existing provision for security in the STCW Convention and Code focused on prevention of security incidents and there were several industry guidance for the matter concerned, agreed not to include the proposal in the list of identified areas to be addressed in the future.

Ballast water management

91 The Group agreed that the addition of training requirements to address the implementation of the Ballast Water Management Convention at a general level was necessary for all officers in chapters II and III and agreed to include all the gaps in the list of identified areas to be addressed in the future, as set out in annex 1, appendix 12.

Cyber security

92 The Group, having agreed that the gaps concerning cyber security would be addressed in chapters II, III, IV and VI, agreed to include all the gaps in the list of identified areas to be addressed in the future, as set out in annex 1, appendix 13.

Gap identified in relation to training provisions for MASS

93 Having noted that MSC 108 had agreed to develop high-level training provisions for the MASS Code, whereby the detailed competence, and knowledge, understanding and proficiency (KUPs) requirements might be developed by the HTW Sub-Committee at a later stage, when the Code had been finalized, the Group agreed to gather all the proposals submitted to the Group regarding the development of MASS training requirements for future consideration, as set out in annex 3. However, the Group did not discuss in detail if the proposals were exclusively MASS-related.

Gaps identified in relation to training provisions for ships using new technologies and alternative fuels

94 The Group noted that MSC 108 had endorsed the agreement by HTW 10 that the output on "Development of a safety regulatory framework to support the reduction of GHG emissions from ships using new technologies and alternative fuels" could be utilized to develop training provisions for seafarers on ships using alternative fuels. Taking into account the ongoing development of safety provisions by the Committee, the CCC Sub-Committee and any other relevant bodies, the Group agreed:

- .1 to gather all the proposals that were submitted to the Group regarding the development of training requirements for ships using new technologies and alternative fuels, as set out in annex 4, and forward them to HTW 11 for consideration under the agenda item on "Development of a safety regulatory framework to support the reduction of GHG emissions from ships using new technologies and alternative fuels" and to encourage interested delegations to contribute to the work on the development of those training provisions under this agenda item; and
- .2 that all other proposals concerning training of seafarers to support the reduction of GHG emissions not entailing the use of new technologies and alternative fuels could be addressed through the comprehensive review.

Observations during consideration of the gaps

95 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.

PREPARATION OF A WORK PLAN FOR THE REVIEW OF ALL THE PROVISIONS OF THE CONVENTION AND CODE

96 Owing to time constraints, the Group was unable to prepare a work plan and recommendations to complete the review of all the provisions of the Convention and Code, nor did it have time to revise the road map.

CONSIDERATION OF THE DRAFT MSC RESOLUTION ON ACCESSIBILITY OF INFORMATION RELATED TO MEDICAL PROVISIONS IN THE STCW CONVENTION

97 Owing to time constraints, the Group was unable to consider the draft MSC resolution on accessibility of information related to medical provisions in the STCW Convention.

ACTION REQUESTED OF THE SUB-COMMITTEE

98 The Sub-Committee is invited to approve the report in general, and in particular to:

- .1 agree to the list of areas identified in the STCW Convention and Code, with a view to being addressed in phase 2 of the comprehensive review (paragraphs 5 to 92 and annex 1);
- .2 request the Secretariat to provide a plain language clarification on when an endorsement should be issued (paragraph 9);

- .3 consider the options discussed by the Group concerning the enhancement of the communication of information provisions related to the oversight and verification processes, and decide, as appropriate, with a view to revising regulations I/7, I/8 and I/16, as well as associated parts of the Code (paragraphs 19 to 24 and annex 2);
- .4 consider the proposals submitted to the Group regarding the development of training provisions for ships using new technologies and alternative fuels, as set out in annex 4, as part of the ongoing work under the output on "Development of a safety regulatory framework to support the reduction of GHG emissions from ships using new technologies and alternative fuels" (paragraph 94 and annex 4);
- .5 note that, due to time constraints, the Group was unable to prepare a work plan and recommendations to complete the review of all the provisions of the Convention and Code, nor did it have time to revise the road map (paragraph 96); and
- .6 note that, owing to time constraints, the Group was unable to consider the draft MSC resolution on accessibility of information related to medical provisions in the STCW Convention (paragraph 97).

ANNEX 1*

LIST OF GAPS IDENTIFIED IN THE STCW CONVENTION AND CODE

APPENDIX 1

Articles of the Convention

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Article II	Review of the definition of "Administration" to provide a linkage to the state entity which is the Party to the Convention	ISWG-STCW 1/2/34 Revision of regulation I/1, section B-II
Article III	Facilitation of transition and/or transfer between industries and relevant conventions, including seagoing service	ISWG-STCW 1/2/29 Revision of section B-III
Article IX	<p>The regulations identified do not include provisions on how the Administrations may adopt or retain equivalencies for training or seagoing service in line with article IX of the STCW Convention. It is necessary that the STCW Convention and the STCW Code provide for the:</p> <p>1 Equivalencies to the STCW-F Convention;</p> <p>2 Procedures to be followed by the Administration in adopting or recognizing education or training that has been undertaken under the national provisions, including, but not limited to, naval qualifications, local (port) systems, etc.;</p> <p>3 Reporting of such arrangements and the evaluations in accordance with the provisions of regulations I/7 and I/8 of the STCW Convention and sections A-I/7 and A-I/8 of the STCW Code.</p>	ISWG-STCW 1/2/18 Revision of section B-IX
Article IX	To ensure that there is a common system in place for Administrations to recognize certificates issued under provisions of the STCW-F Convention, and any other national system in place. As discussed by South Africa, these amendments will make it easier for seafarers already in the industry, who may seek opportunities elsewhere, to grow or change their subsectors which will help address the global shortage of STCW-certified seafarers.	ISWG-STCW 1/2/48 Revision of section B-IX

* Annex in English only.

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Article VI	Review "certificate issuing Administration" in line with article II.	ISWG-STCW 1/2/34 Revision of regulation I/1
Article VIII	Obsolete unit for gross tonnage (register tons).	ISWG-STCW 1/2/11 Revision of section B-VIII
Article VIII	Obsolete unit for gross tonnage (register tons).	ISWG-STCW 1/2/25 Revision of section B-VIII
Article VIII	"1600 GRT" to be changed to "3000 GT"	ISWG-STCW 1/2/34 Revision of section B-VIII
Article VIII	The "Format of dispensation" needs to be prescribed and communication of such dispensations to the Organization be made more effective. Add GMDSS Radio Operator to article VIII paragraph (1) along with Radio officer/Radiotelephone operator.	ISWG-STCW 1/2/34 Revision of parts A and/or B of the Code
Article VIII	Clarify the reporting requirements of dispensations.	ISWG-STCW 1/2/11 Revision of section B-VIII to address the issue of NIL reporting for dispensation.

APPENDIX 2

Chapter I

Regulation I/1
Section A-I/1
Section B-I/1

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/1, paragraph 1	<p>1 Definitions are not in alphabetical order and should be arranged in order for ease of referencing.</p> <p>2 Definition of seafarers - as per the MLC, 2006, as amended to be included.</p> <p>3 Definition of trainees - Trainee officer to be added: Trainee officer means a prospective officer being trained to become a certified officer.</p> <p>4 Definition of trainees - Trainee Rating to be added: Trainee Rating means a prospective rating being trained to become a certified rating.</p> <p>5 Include the definitions of cyber security, Company Training Officer (CTO), Shipboard Training Officer (STO) and Structured Shipboard Training Plan (SSTP).</p> <p>6 Add definition of rating forming part of a watch in accordance with regulations II/4, III/4 and VII/2.</p> <p>7 Definition 11 and 12 to merge Radio operator and GMDSS radio operator.</p>	ISWG-STCW 1/2/35
Regulation I/1, paragraph 1	<p>New definitions, and clarifications to existing definitions may be necessary to address emerging technology and trends.</p> <p>There is an inconsistency in the formatting of the definitions for external references. While some external references, such as the ISPS Code and Polar Code are defined explicitly, others (e.g. SOLAS, Radio Regulations) are only referenced in other definitions. Some of these references include acronyms and some do not.</p>	ISWG-STCW 1/2/16

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/1 paragraph 1	Include a definition for "oil/chemical tanker" as most ships are built as such and personnel working on board such ships require certification for both. Further explanation to support the need for this is provided under "Ch. V and STCW Code A-V – Review the requirements for training and certifications for advanced oil, chemical and liquefied gas tankers and ships subject to the IGF Code" below.	ISWG-STCW 1/2/19
Regulation I/1	<p>1 Lacking the definitions of "seafarer", "crew", "medical certificate", and "quality standards system", which may lead to inconsistent interpretation and implementation of subsequent provisions.</p> <p>2 The defining method used for "Deck officer" and "Engineer officer" are inconsistent, with electro-technical officer being excluded from engineer officer.</p> <p>3 The definition of oil tanker in regulation I/1 is inconsistent with that in the SOLAS and MARPOL Conventions.</p>	ISWG-STCW 1/2/25
Regulation I/1 Regulation I/1.15	Revision to align with other sections of the Convention and Code.	ISWG-STCW 1/2/46
Regulation I/1, paragraph 1.26	Including an agreed framework for replacement of seagoing service by simulator time in the definitions of the STCW Convention, preferably by adding a new paragraph, as it affects a wide range of regulations within the Convention and sections within the Code.	ISWG-STCW 1/2/10
Regulation I/1, paragraph 1.45	Revision to define "original form" as an electronic form of any certificate.	ISWG-STCW 1/2/21

Regulation I/2
Section A-I/2
Section B-I/2

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/2	The provisions lack flexibility for administrations to extend the validity period of certificates in cases of exceptional circumstances. (i.e. COVID) .	ISWG-STCW 1/2/16
Regulation I/2, paragraph 2	Regulations V/3 and V/4 (IGF and Polar Codes). Supported for consistency and cross-referencing only.	ISWG-STCW 1/2/35
Regulation I/2, paragraph 2.14	Include cadets in the register of certificates.	ISWG-STCW 1/2/10
Regulation I/2, paragraph 2	Requires the addition of V/2, V/3 and V/4 to the existing text to capture other relevant regulations of the Convention in this paragraph. Supported for consistency and cross-referencing only.	ISWG-STCW 1/2/46
Regulation I/2, section A-I/2	<p>Amendments to paragraphs 6, 7, 9, 11, 13, 15 and 16 of regulation I/2 and paragraphs 5, 7 to 9 of section A-I/2.</p> <p>Paragraph 6 needs to be amended for clarity that provision is only applicable to regulation I/2, paragraph 5 (endorsement attesting the issuance of a certificate).</p> <p>Paragraph 7, 9, 11, 13, 15, and 16 be amended to address potential inconsistency and potential different interpretations.</p> <p>Amend paragraphs 5, 7 to 9 of section A-I/2 for clarification and inclusion of criteria relevant to the seagoing service required for issuance of certificates of competency at the management level. Supported except for age (paragraph 13.2).</p>	ISWG-STCW 1/2/3
Regulation I/2, paragraph 7	If regulation I/2 requires that endorsement shall only be issued by the recognizing Administration if all the requirements of the Convention have been complied with, it seems that it duplicates the process of the independent evaluation under regulation I/8. Supported, clarification of the term "endorsements" needed	ISWG-STCW 1/2/20
Regulation I/2, paragraph 7.2	Requires the addition of V/2, V/3 and V/4 to the existing text to capture other relevant regulations of the Convention in this paragraph. Supported for consistency and cross-referencing only.	ISWG-STCW 1/2/46
Regulation I/2, paragraph 7.2	Add regulations V/3 and V/4 (IGF and Polar Codes). Supported for consistency and cross-referencing only.	ISWG-STCW 1/2/35
Regulation I/2, paragraph 8.4	According to the current regulation, if the endorsement expires or if it is withdrawn, suspended, or cancelled by the issuing Party, the	ISWG-STCW 1/2/30

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	<p>certificate's validity ceases immediately and, in any case, expires five years from the date of issuance. However, the COVID-19 pandemic has highlighted the inflexibility of this regulation, as seafarers encountered significant challenges in renewing their certificates.</p> <p>In cases of unavoidable situations such as pandemics or exceptional circumstances, it is necessary to consider amendments to provide flexibility regarding the validity periods.</p>	
<p>Regulation I/2, section A-I/2, paragraph 9.1</p> <p>Section B-I/2, paragraph 3</p>	<p>- Certificate of competency (CoC), certificate of proficiency (CoP), documentary evidence, medical certificates and any other documents issued under the STCW Convention and Code, must be accepted in electronic format.</p> <p>- Paragraph 9.1 and consider reference to electronic certificates. Mentioning "destroyed" or "reported lost", when it concerns electronic certificates, may not necessarily apply.</p> <p>- Paragraph 5.9, concerning the information in the format of the CoPs, the photograph may not be needed for electronic certificates. Although part B of the STCW Code is a recommendation, it shall be aligned.</p> <p>Consider moving the format of the CoPs from part B to part A of the STCW Code.</p> <p>A new format for electronic certificates should also be considered. The text included in the form of the STCW Convention and Code might be difficult to read and not necessary when having the certificate on a mobile phone. .</p>	ISWG-STCW 1/2/10
<p>Regulation I/2, paragraph 11</p> <p>Table B-I/2</p>	<p>Propose to amend the Convention language to provide clarity/flexibility regarding the use of digital certificates.</p>	ISWG-STCW 1/2/44
<p>Regulation I/2, paragraph 13.3</p>	<p>The requirement to meet the standards for medical fitness in A-I/9 of the STCW Code prior to issuing a Certificate of Competency may be an unnecessary administrative burden.</p>	<p>ISWG-STCW 1/2/16</p> <p>Revise paragraph 13.3 to remove the requirement to qualify for medical certification prior to the issuance of a certificate of competency.</p>

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
<p>Regulation I/2 Paragraphs 14 Paragraph 15 Paragraph 16 Section A-I/2 Regulation I/9 Regulation V/2</p>	<p>While there are provisions under the STCW Convention for the verification and registration of certificates, they do not provide specific requirements for:</p> <p>1 Means, procedure or mechanism for real-time verification of its authenticity and validity; and</p> <p>2 The nature of a register, taking into consideration the available technologies for digitalization of documents.</p> <p>Further, the phrase "electronic means" mentioned in regulation I/2, paragraph 16 and "electronic register" in section I/2, paragraph 7 are vague and may be subject to different interpretations.</p> <p>There is no specific provision in the Convention requiring the authenticity and validity of documentary evidence under regulations I/9 (medical certificates) and V/2 (documentary evidence of training) to be verifiable by other Parties or companies. It does not also require maintaining a register of documentary evidence.</p>	<p>ISWG-STCW 1/2/21</p> <p>Addition of a new regulation for the maintenance of electronic register and real-time verification of certificates and endorsements under regulation I/2, medical certificates under regulation I/9 and documentary evidence of training under regulation V/2</p> <p>Addition of a new section in support of the proposed new regulation;</p> <p>Revision of A-I/2 and B-I/2, table B-I/2 as appropriate</p>
<p>Regulation I/2, paragraph 16</p>	<p>The 1 January 2017 date has passed.</p>	<p>ISWG-STCW 1/2/16</p>
<p>Regulation I/2</p>	<p>- Paragraph 12 of the existing Regulation I/2 requires Parties to ensure that certificates are issued "to candidates who comply with the requirements of this Regulation", i.e. Regulation I/2, but not if all other requirements of the Convention have been complied with.</p> <p>- The Certificates of Proficiency (CoP) issued to masters and officers in accordance with the provisions of regulations V/1-1 and V/1-2, are not required to include a date of expiry.</p> <p>However, the provision in Regulation I/11, paragraph 3, requires masters and officers certified in accordance with the provisions of Regulations V/1-1 and V/1-2 to establish continued professional competence for tankers "at intervals not exceeding five years".</p> <p>It is therefore unclear how masters and officers holding Certificates of Proficiency for tankers with indefinite validity should establish continued</p>	<p>ISWG-STCW 1/2/11</p>

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	<p>professional competence at intervals not exceeding five years.</p> <p>- Paragraph 13.4 requires candidates for certification to provide satisfactory proof of having completed "any related compulsory training required by these Regulations for the certificate applied for".</p> <p>However, the provisions in Regulations II/1, II/2.2.2, III/1, III/2, III/3, III/6, IV/2, VII/1, require candidates for the relevant certificates to have completed approved education and training.</p> <p>- Paragraph 13.5, which requires candidates for certification to provide satisfactory proof of having met "the standards of competence prescribed by these regulations for the capacities, functions and levels that are to be identified in the endorsement to the certificate", does not apply to candidates to CoPs as an endorsement is not required to be issued, although those candidates are also required by the relevant regulations to meet the standards of competence concerned.</p> <p>- Paragraph 15, which require each Party to make available information on the status of certificates of competency, endorsements and dispensations to other Parties and companies for verification of their authenticity and validity when seafarers seek recognition of their certificates under Regulation I/10 or employment on board, does not apply to CoPs issued to masters and officers on tankers, while these CoPs are also required to be recognized by endorsement under Regulation I/10 in accordance with the provisions of Regulation I/2, paragraph 7.</p> <p>- Paragraph 16, which reads "the information on the status of information required to be available in accordance with paragraph 15 shall be made available [...] through electronic means", is unclear and inconsistent with the text of paragraph 15.</p>	
Section B-I/2	Does not specify the essential elements to be included in certificates of dispensations. It is recommended that such elements be clarified to avoid inconsistencies in implementation by each Party;	ISWG-STCW 1/2/25 1 Conduct a comprehensive review of the types of certificates covered by the Convention;

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
		<p>2 Specify the basic elements to be included on the certificate of dispensations;</p> <p>3 Adjust the elements that should be included on the medical certificate from sections A-I/9 to A-I/2, and specify the format of the medical certificate.</p>
Section A-I/2	<p>- Paragraph 3, on basic safety training, A-VI/2, paragraphs 5 and 11, on survival craft and rescue boats other than fast rescue boats, and on fast rescue boats, and A-VI/3, paragraph 5, on advanced fire-fighting, establishes that "seafarers qualified in accordance with [...] shall be required, every five years, to provide evidence of having maintained the required standards of competence".</p> <p>However, the Convention does not require CoPs to be issued with a validity date. It is therefore unclear how seafarers holding CoPs issued with indefinite validity should provide evidence of having maintained the required standard of competence every five years. Like previous.</p> <p>- Paragraph 4.2, requires Parties using formats which might be different from those set forth in section A-I/2 to ensure that in all cases all information relating to "the capacity or capacities in which the holder is entitled to serve [...], as well as any limitations" are "prominently displayed and easily identified".</p> <p>Therefore, in using such formats, Parties are not obliged to ensure that all information related to the functions the holder is entitled to perform on board, together with their associated levels of responsibility and limitations, are displayed in the document. However, this is not consistent with regulation VII/1, paragraph 1, which requires stating on the certificates and in the endorsements the "associated functions and levels of responsibility".</p>	ISWG-STCW 1/2/11

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	<p>- Paragraph 5, which was moved from part B to part A of the Code in the context of the Manila amendments, includes the verb tense "should", instead of "shall", for establishing the requirement to ensure that the seagoing service to be approved for certification is relevant to the qualification being applied for. This is found inconsistent.</p> <p>- Paragraph 6 of section A-I/2, which was moved from part B to part A of the Code in the context of the Manila amendments, refers to "approval of training courses" and, therefore, it is not consistent in this section on "certificates and endorsements".</p> <p>- Paragraph 6 provides that in approving training courses and programmes, Parties should take into account that the relevant IMO Model Courses can assist in the preparation of such courses and programmes and ensure that the detailed learning objectives recommended therein are suitably covered.</p> <p>However, the development, updating and validation of the IMO Model Courses might be delayed in relation to the date of entry into force of amendments to the tables of competence in the STCW Code. Consequently, the detailed learning objectives recommended in the IMO Model Courses may become obsolete at a certain time. In addition, the existing paragraph 6 of section A-I/2 cannot be changed into a mandatory provision because of the recommended character of the IMO Model courses.</p> <p>- Paragraph 7 of requires Administrations to issue endorsements attesting the recognition of certificates of competence and of certificates of proficiency issued to masters and officers in accordance with the provisions of regulations V/1-1 and V/1-2 to use the form of endorsement set forth in paragraph 3 of section A-I/2 of the STCW Code.</p> <p>However, this form is not consistent for endorsements attesting the recognition of certificates of proficiency issued to masters and officers in accordance with the provisions of regulations V/1-1 and V/1-2.</p>	

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	<p>- Paragraph 7 of section A-I/2 refers to "the maintenance of the electronic register in accordance with paragraph 15 of regulation I/2".</p> <p>However, paragraph 15 of regulation I/2 does not provide for establishing or maintaining an electronic registry but requires Parties to make available information to other Parties or companies on the status of certificates, endorsements and dispensations issued to seafarers seeking recognition under regulation I/10 or employment, while paragraph 16 of regulation I/2 requires that such information is made available through electronic means.</p> <p>- Paragraph 9 of section A-I/2, which was taken from part B of the Code in the context of adoption of the Manila amendments, uses the verb tense "should", instead of "shall", to specify the items of information that are required to be recorded in the database for certificate registration.</p>	
Section B-I/2	<p>- Paragraph 1.4.4 Incorrectly refers to regulation VII/1. Regulation VII/2 is the one referring to "certification of seafarers".</p> <p>- Reference to regulation V/1 paragraph 1.4.4.5, is not correct since that regulation does not exist.</p> <p>- The example given in paragraph 1.8 in section B-I/2 may be confusing.</p> <p>- Guidance on relevant to the extension of validity of a certificate of proficiency when the application is made within six months before its expiry, and whereas the validity may be extended until the fifth anniversary of its date of expiry, or extension of validity, is not provided in the current text of this section.</p> <p>• Paragraph 1.8 and 1.10 are not in compliance with regulation I/2 and section A-I/2. The given examples lead to incorrect interpretations which limitations can be entered on the certificate. The limitation to wear corrective lenses appears on the medical certificate; it is not necessary to enter it to the "limitations" column. It is not necessary to enter a limitation to any CoC if not qualified under chapter V. However, due to the unnecessary examples listed there, misinterpretations arise, and further limitations are entered that are not provided for in the STCW Convention, e.g. only on traditional ships, only on sailing ships or size limitations that are not 3,000 GT or 3,000 kW.</p>	ISWG-STCW 1/2/11

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Section B-I/2	Guidelines on the use of electronic certificates of seafarers should be reviewed to ensure all types of documentary evidence issued in accordance with the convention are included, and all guidelines to incorporated into part B of the STCW Code.	ISWG-STCW 1/2/16 Review MSC.1/Circ. 1665 Guidelines on the Use of Electronic Certificates for Seafarers and incorporate into section B-1/2 as appropriate.

Regulation I/3
Section A-I/3
Section B-I/3

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/3	Paragraph 5 is about seafarers holding near-coastal voyage (NCV) certification to be engaged in near-coastal voyage areas of other coastal States, and hence, it has to be inserted in place of paragraph 6, and other paragraphs to remain the same.	ISWG-STCW 1/2/35

Regulation I/4
Section A-I/4
Section B-I/4

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/4 paragraph 1.1 paragraph 2.1	<p>The term "documentary proof" is not defined. This is an inconsistency with the defined term "documentary evidence" (Regulation I/1 paragraph 1.32)</p> <p>This inconsistency is noted in several additional provisions throughout the Convention and Code: Regulations I/5, paragraph 4.2 and I/10 paragraph 5, and section B-I/10, paragraphs 2 and 3.</p>	ISWG-STCW 1/2/16

Regulation I/5
Section A-I/5
Section B-I/5

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/5, section B-I/5	Considering measures to promote the use of electronic certificates of seafarers, which are effective in preventing fraudulent certificates, such as drafting additional provisions in the STCW Code B that encourage Administrations to independently develop measures for electronic data management and security.	ISWG-STCW 1/2/30
Section A-I/5, section B-I/5	<p>Section lacks provisions to address the need for information sharing and cooperation between Parties to detect and prevent unlawful practices associated with fraudulent activities associated with the seafarer certificates.</p> <p>No provisions currently exist. Development of guidance may be necessary depending on potential changes to regulation I/5 or section A-I/5.</p>	ISWG-STCW 1/2/16

Regulation I/6
Section A-I/6
Section B-I/6

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Section A-I/6	There are no mandatory standards for distance learning and e-learning, which may affect the quality of training or lead to abuse.	ISWG-STCW 1/2/25 Move the guidance about distance learning and e-learning in section BI/6 to the mandatory provisions in section A-I/6.
Section A-I/6	<p>Section lacks provisions for the use of distance learning and modern technology.</p> <p>During the COVID pandemic, administrations successfully integrated new delivery formats for seafarer training that provide flexibility in meeting the competence requirements of the Convention.</p>	ISWG-STCW 1/2/16

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Section B-I/6	Although 'Guidance regarding Training and Assessment' provide guidance on distance education and e-learning, there are limitations in applying them to educational equipment that utilizes new digital technologies.	ISWG-STCW 1/2/30
Section B-I/6	The guidance does not account for developments in distance learning techniques and delivery methods.	ISWG-STCW 1/2/16
<p>Regulation I/6, Section A-I/6</p> <p>Regulation I/8 Section A-I/8</p> <p>Regulation I/11 Section A-I/11</p> <p>Regulation I/14 Section A-I/14</p>	<p>Establish procedures detailing the planning, supervision and monitoring of the training on board. Include digital tools to monitor the onboard training.</p> <p>In order to facilitate more coherent development of an approved seagoing service as part of the approved training programme (onboard training), modernization could focus on the onboard training register and the possibility of developing digital tools to monitor onboard training.</p> <p>Companies should also ensure that the trainees and the responsible officers on board have sufficient time for performing their duties arising from the STCW Convention and Code.</p> <p>The ISM Company should also have a role in this process for both knowledge sharing from the office as well as facilitation. This should be part of the STCW regulations and Code and is also relevant for the developments under alternative certification.</p> <p>Distance learning programmes, in combination with guidance for the onboard responsible master and officers, would benefit the learning objectives of seagoing service.</p> <p>The ISM Company should also have a role in this process for both knowledge sharing from the office as well as facilitation. This should be part of the STCW regulations and Code and is also relevant for the developments under alternative certification.</p>	ISWG-STCW 1/2/10

Regulation I/7
Section A-I/7
Section B-I/7

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/7 Sections A-I/7 Section B-I/7	Amendments to regulation I/7 of the Convention and sections A-I/7 and B-I/7 of the Code for clarity and consistency.	ISWG-STCW 1/2/8
Section A-I/7 Paragraph 3.3	Reference to "seafarers holding alternative certificates issued under regulation VII/1". However, it is not regulation VII/1 but regulation VII/2 the one referring to "certification of seafarers".	ISWG-STCW 1/2/11
Section A-I/7	Paragraph 3.4 Language is needed to address repetitive requirements for submissions of information Paragraph 4 Section lacks clarity on what constitutes "within six months of its completion" of an independent evaluation when reporting the results of each independent evaluation. Paragraph 9 Section lacks clarity for the timeframe for panels of competent persons to complete their initial consideration of the information submitted, and that Parties should be expected to provide requested clarification to a panel. Revision is needed to address inconsistencies between requirements and practical procedures in paragraphs 10, 10.3 and 13. (e.g. tendencies for use of email in lieu of meetings, elections of competent person panel chairs by the Secretariat, etc.)	ISWG-STCW 1/2/16
Section A-I/7	Paragraph 4 propose to amend to provide clarity regarding the information that the Report of the Independent Evaluation must contain. Paragraph 9 Timeline missing for the panel of competent person to review the report.	ISWG-STCW 1/2/44
Section B-I/7	Amend the content in accordance with paragraph 4 of section A-I/7, and in particular, add content regarding the "verification" specified in paragraph 4.4.1.	ISWG-STCW 1/2/25

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Section B-I/7	Guidance should be updated to support a streamlined process for the communication of information, including the use of modern technology to accomplish the objectives of the requirements (i.e. virtual meetings, modern methods of information sharing), and the development and publication of a timely "white list" of parties giving the Convention full and complete effect.	ISWG-STCW 1/2/16
Regulation I/7 Section A-I/7	Identifies challenges, emanating from the information exchange with the panels of competent persons, in particular the timing for taking corrective measures as part of the submission of the independent evaluation reports and related documents; modernization of methods to handle information; and procedures for reporting to the Committee by the Secretary-General. Noted Issues identified by CP Panels: 1 Knowledge of the STCW Convention 2 Regulatory issues 3 Development of training programmes	ISWG-STCW 1/2/47

Regulation I/8
Section A-I/8
Section B-I/8

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/8.2	The provisions do not specify criteria for the qualification of the "qualified person" who can perform the tasks as described.	ISWG-STCW 1/2/26
Section A-I/8 Paragraph 1	Provides requirements relevant to education and training objectives, examination and assessment of seafarers, and levels of knowledge, understanding and proficiency to be achieved, which are not directly associated with the requirement for implementing a quality standards system provided for by regulation I/8.	ISWG-STCW 1/2/11
Section A-I/8 Paragraph 3	Section lacks clarity on the five-year interval between successive independent evaluations.	ISWG-STCW 1/2/16
Section A-I/8	Review and specify the scope of the independent evaluation	ISWG-STCW 1/2/25 The scope of the independent evaluation may be set forth in a similar

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
		manner as adopted by section A-I/16 (with items listed in tables), to avoid inconsistent interpretation of this section.
Regulation I/8 Section A-I/8 Section B-I/8.	<p>Amendments for clarity and consistency:</p> <p>1 the scope of activities covered by the QSS be shifted to section A-I/8, paragraph 2 of the STCW Code; and</p> <p>2 the applicable activities are clearly specified therein.</p> <p>3 Clarify what quality-standards models are acceptable for the training providers (section B-I/8, paragraph 3).</p> <p>4 Clarify provisions applicable to an external audit from a training provider and those applicable to independent evaluation.</p> <p>5 Clarify applicability (regulation and sections) to the Maritime Administration (certification system) and approved training providers.</p> <p>6 Clarify:</p> <p>.1 whether independent evaluation should cover all approved training providers, as set out in section B-I/8, paragraphs 4.6, 5.3 and 7; and</p> <p>.2 who should conduct independent evaluation from the training providers, as set out in section B-I/8, paragraph 7, second sentence, which states that "a recognized academic accreditation or quality-standards body or Government agency should be used".</p>	ISWG-STCW 1/2/7
Regulation I/8 Section A-I/8	<p>The following matters have been identified for clarification with a view to consistently implementing the quality standards, the oversight requirements and the review conducted by the panels of competent persons:</p> <p>- whether the QSS shall be developed and audited based on the STCW Convention or a generic quality management standard might be acceptable.</p>	<p>ISWG-STCW 1/2/47</p> <p>The following may need consideration and addressing:</p> <p>1 Structure and implementation of the current verification of compliance scheme; and</p>

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	<p>- how the QSS serves to monitor all the activities covered by the Convention (all training, assessment of competence, certification, including medical certification, endorsement and revalidation activities) in a comprehensive manner, irrespective of the entity that performs these activities, such as governmental and non-governmental agencies, training institutions or shipping companies;</p> <p>- the meaning of "independent evaluation", in particular: .1 .2 .3 who is entitled to conduct an independent evaluation; whether an external audit of the QSS conducted by a duly accredited body to certify the system can be considered an independent evaluation or a separate evaluation conducted by "qualified persons" is necessary; and coordination of the independent evaluation processes by different entities involved in the implementation of the Convention, avoiding duplication and promoting complementarity.</p>	<p>2 use and understanding of circulars MSC.1/Circ.1163 and MSC.1/Circ.1164, taking into account STCW regulation I/7.3.2 (see paragraph 14.4); and 3 the possibility of using IMSAS to streamline the STCW compliance and quality standard evaluation process.</p>

Regulation I/9
Section A-I/9
Section B-I/9

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/9 Section A-I/9	Clarify the term "Party".	ISWG-STCW 1/2/11
Regulation I/9 Section A-I/9	<p>Documents issued under the Convention and Code, must be accepted in electronic format.</p> <p>Medical certificates format in section A-I/9 also require a signature of the seafarer.</p>	ISWG-STCW 1/2/10
Regulation I/9	Medical standards do not incorporate relevant elements of the Guidelines on the medical examination of seafarers (STCW.7/Circ.19/Rev.1), in particular, the requirements for authorizing medical practitioners and examination procedures.	ISWG-STCW 1/2/11
Regulation I/9 Paragraph 4.2	Delete the words "his/her" to make it gender neutral.	ISWG-STCW 1/2/35
Regulation I/9, paragraph 4.2 Section A-I/9, paragraph 1, 7.1.2.3	There is a binary reference to gender in both of the annexes to the Convention and the part A of the STCW Code.	<p>ISWG-STCW 1/2/44</p> <p>Propose to use the phrasing "their" to replace "his/her". Also, propose to remove the phrasing in parenthesis "(Male/Female)".</p>

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/9	<p>The provisions for the extension of medical certificates in paragraphs 6 and 7 may not allow administrations enough flexibility in cases of exceptional circumstances (e.g. COVID).</p> <p>Paragraphs 6 and 7 include duplicative provisions and require clarification.</p>	ISWG-STCW 1/2/16
Regulation I/9, paragraph 5	In cases of unavoidable situations such as pandemics or exceptional circumstances, there is a need to examine whether additional flexibility is required for this regulation.	ISWG-STCW 1/2/30
Section A-I/9	Medical fitness specified details of seafarer should be revised and add "others".	ISWG-STCW 1/2/35
Section A-I/9	Footnotes to Table A-I/9 reference external documents that are out of date or not readily available.	ISWG-STCW 1/2/16
Section A-I/9, paragraph 7	States that "The medical certificate provided for in regulation I/9, paragraph 3 shall include the following information as a minimum: .2.3 Gender: (Male/Female)".	<p>ISWG-STCW 1/2/10</p> <p>Ensure the provision reflects gender equality and inclusivity.</p>
Section B-I/9.2	The reference to the ILO/IMO guidelines on the medical examinations of seafarers is outdated and should be updated.	ISWG-STCW 1/2/10
Section B-I/9, paragraph 12	References external documents are out of date or not readily available.	<p>ISWG-STCW 1/2/16</p> <p>Evaluate Sections A-I/9 and B-I/9 to ensure the provided external reference documents are up to date. Replace external references if there are more recent, relevant, or readily available versions.</p>

Regulation I/10
Section A-I/10
Section B-I/10

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/10	When a certificate recognition arrangement is explicitly established or reviewed, a written undertaking should be concluded between the Party which is to recognize the certificates (i.e. the Administration), and the Party which is issuing the certificates to be recognized (i.e. the certificate-issuing Party).	ISWG-STCW 1/2/25
Regulation I/10 Section B-I/10	1. Amending paragraphs 1, 3, 5 and 6 of regulation I/10 and section B-I/10; 2 Revision of guidance MSC.1/Circ.1450; and 3 Amending paragraph B-I/10.1 and transferring it to section B-I/2 of the STCW Code. For clarity.	ISWG-STCW 1/2/9

Regulation I/11
Section A-I/11
Section B-I/11

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/11, paragraph 1	Requires revision to remove regulation V/3 from the text. Requires the addition of a new paragraph to cover the IGF requirements separately and renumbering relevant existing paragraphs.	ISWG-STCW 1/2/46
Regulation I/11, paragraph 1	Inconsistency in the requirements for the revalidation of a Certificate of Proficiency issued under regulation V/3 and regulation V/1-1 or regulation V/1-2.	ISWG-STCW 1/2/44 Propose to amend the existing language to take into consideration that since the required standard of competence was met when the seafarer obtained the Certificate of Proficiency, we should consider, at intervals not exceeding five years, that continued professional

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
		competence be established similar to regulation I/11, paragraph 3.
Regulation I/11, paragraph 1	<p>Address duplication:</p> <p>.1 intent of regulation I/11.1 is to specify revalidation requirements for certificates of competencies for service on any type of ship;</p> <p>.2 intent of regulations I/11.3 and I/11.4 are for revalidation of certificates of proficiencies, or endorsements, for service on tankers and ships operating in polar waters; and</p> <p>.3 intent of regulation V/2.4 is to specify requirements for revalidation of certificates/documentary evidence for service on passenger ships.</p> <p>Taking the above into account, it seems that regulation I/11.1; .1 duplicates the revalidation requirements set out in regulations I/11.3, I/11.4 and V/2.4 for service on tankers, ships operating in polar waters and passenger ships; and .2 mandates establishing continued professional competence (approved seagoing service) for revalidation of recognition endorsements.</p>	ISWG-STCW 1/2/6
Regulation I/11	<p>Maximum interval for meeting the standards of medical fitness in paragraphs 1 and 1.1 do not align with the prescribed interval in regulation I/9, paragraph 5 and can be prohibitive to seafarers returning to the industry after more than 5 years.</p> <p>The requirement to meet the standards for medical fitness in A-I/9 of the STCW Code prior to revalidating a Certificate of Competency may be an unnecessary administrative burden.</p>	ISWG-STCW 1/2/16
Regulation I/11, paragraphs 1, 3 and 4	The provision of "at intervals not exceeding five years" may make it difficult to comply with it in the event of an inevitable situation such as a pandemic or exceptional circumstances.	ISWG-STCW 1/2/30
Regulation I/11, paragraph 3 paragraph 4	Address redundancy since paragraph 1 refers to certificates "issued or recognized under any chapter of the Convention other than regulation V/3 or chapter VI", and, therefore, it also applies to certificates issued or recognized under regulations V/1-1, V/1-2 and V/4.	ISWG-STCW 1/2/11
Regulation I/11, paragraph 5	1 January 2017 date has passed.	ISWG-STCW 1/2/16

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/11	Adding appropriate extension clauses and reporting requirements for seafarers whose medical certificates, certificates of competency or recognition of certificates cannot be renewed or revalidated due to exceptional circumstances factors, such as the impact of the pandemic.	ISWG-STCW 1/2/25
Regulation I/11.5 2	Transitional provisions have expired.	ISWG-STCW 1/2/25
Regulation I/11 Section A-I/11	Clarify the provisions on "who is serving at sea or intends to return to sea after a period ashore" which might be confused.	ISWG-STCW 1/2/11
Regulation I/11 Section A-I/11	<p>Proposed new paragraph for regulation I/11 for seafarers on ships subject to the IGF Code: "Every master, engineer officer or officer shall, for continuing seagoing service on board ships under the IGF code, meet the requirements in paragraph 1 of this regulation and be required, at intervals not exceeding five years, to establish continued professional competence for ships operating with fuels listed under the IGF Code requirements in accordance with section A-I/11, paragraph 3a (new paragraph, see below) of the STCW Code."</p> <p>Proposed new paragraph for section A-I/11 for seafarers on ships subject to the IGF Code: "Continued professional competence for ships operating with fuels listed under IGF code requirements as required under regulation I/11, paragraph 3a (new paragraph, see above) shall be established by: .1 approved seagoing service, performing duties appropriate to the IGF certificate or endorsement held, for a period of at least one month in total during the preceding five years; or .2 successfully completing an approved relevant training course or courses."</p>	ISWG-STCW 1/2/35
Section A-I/11, paragraph 3	Requires the addition of a new sub-paragraph and renumbering existing sub-paragraphs to cover revalidation requirements using an alternative acceptable occupation.	ISWG-STCW 1/2/46
Section A-I/11, paragraph 3.1	The phrase "performing duties appropriate to the tanker certificate or endorsement held" does not allow flexibility for oil/chemical tankers.	ISWG-STCW-1-2-19
Section A-I/11	It is proposed that simulator-based training and assessment be included as options to establish continued professional competence for revalidation of certificates.	ISWG-STCW 1/2/26
Section B-I/11	Although 'Guidance regarding Training and Assessment' provide guidance on distance education and e-learning, there are limitations in applying them to educational equipment that utilizes new digital technologies.	ISWG-STCW 1/2/30

Regulation I/12
Section A-I/12
Section B-I/12

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/12	Provisions do not include the use of non-mandatory simulator training to meet certain requirements.	ISWG-STCW 1/2/16
Regulation I/12 Section A-I/12 Section B-I/12	<p>Although it is comprehensively expressed as the 'use of simulators', it is necessary to review whether it includes various new digital technologies, IRT such as AR, VR, MR, and Metaverse. It is necessary to review whether it includes technologies that utilize IRT.</p> <p>Standards governing for the Use of Simulators include simulator performance standards, training and evaluation procedures, etc., including radar, ARPA, and ECDIS simulation, but do not include content on education and training based on new digital technologies.</p> <p>Although 'Guidance regarding Training and Assessment' provide guidance on distance education and e-learning, there are limitations in applying them to educational equipment that utilizes new digital technologies.</p>	ISWG-STCW 1/2/30
Regulation I/12, paragraph 1.1	<p>The term "mandatory" requiring the performance standards and other provisions laid down in section A-I/12 to be complied with in respect of "all mandatory simulator-based training" leaves such training unspecified.</p> <p>While some Parties have interpreted that the mandatory training referred to in this provision is the training considered in accordance with the national provisions, few other Parties interpret that the reference to mandatory training means the training explicitly required by the STCW Code to be conducted or carried out by means of a simulator.</p>	ISWG-STCW 1/2/11
Regulation I/12 Section A-I/12	Provisions concerning the minimum technical specification for simulation equipment as well as the qualifications and experience of instructors and assessors, and the competences and associated KUPs in which seagoing time can be replaced with time spent in simulators (e.g. Collision Avoidance, Emergency Management, Communication) should be revised, partly tightened (e.g. in regard to technical aspects and maximum number of trainees) and specified.	ISWG-STCW 1/2/10

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Section A-I/12, part-I	'Additional performance standards' provisions have not addressed ECDIS simulation operational capacities. It is proposed that ECDIS simulation operational capacities as per all applicable performance standards adopted by the Organization be included within the section.	ISWG-STCW 1/2/26
Section A-I/12 Section B-I/12	<p>Section is lacking performance standards and provisions for the use of modern simulation.</p> <p>There are currently no provisions for some types of simulators in common use today.</p> <p>Section lacks guidance for the use of modern simulation in seafarer training.</p>	ISWG-STCW 1/2/16
Section B-I/12	Amend the guidance regarding the use of simulators based on the latest performance standards for radar equipment, GMDSS equipment and ECDIS, as well as the Guidance on Good Practice for ECDIS (MSC.1/Circ.1503/Rev.2).	ISWG-STCW 1/2/25

Regulation I/14
Section A-I/14
Section B-I/14

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/14	Regulation I/14 holds Companies responsible for ensuring that seafarers assigned to any of its ships have received refresher and updating training as required by the Convention, thus this should be clarified.	ISWG-STCW 1/2/11
Regulation I/14	The guidance in section B-VIII/1.8 proposes that companies consider the implementation of a policy of drug and alcohol abuse prevention. However, this guidance should be moved to the text of the STCW Convention in regulation I/14.	ISWG-STCW 1/2/10
Regulations I/14.1	Requires that each seafarer assigned to any of its ships holds an appropriate certificate in accordance with the provisions of the Convention and as established by the Administration. Regulation IV/2 requires that every person in charge of or performing radio duties on a ship required to participate in the GMDSS shall hold an appropriate certificate related to the GMDSS, issued or recognized by the Administration under the provisions of the Radio Regulations. The term appropriate certificate and the term "Radio Regulations" are not defined. Clarify the meaning of appropriate certificate or delete it.	ISWG-STCW 1/2/11
Section A-I/14	Paragraphs 3 and 4 are duplicative of requirements in chapters II, III, and V. Many of the referenced guidance in B-I/14 is generally applicable to all ships and seafarers and are not necessarily specific to passenger and ro-ro passenger ships.	ISWG-STCW 1/2/16
Section B-I/14	Guidance under paragraphs 2 and 3 is duplicative of requirements in chapters II, III, and V, and is generally applicable to all ships and seafarers and is not necessarily specific to passenger and ro-ro passenger ships.	ISWG-STCW 1/2/16

Regulation I/15
Section A-I/15
Section B-I/15

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/15 - Transitional provision.	These regulations contain transitional provisions that have expired.	ISWG-STCW 1/2/25
Regulation I/15, paragraph 1 paragraph 2	The 1 January 2017 date has passed. Transitional provisions will be necessary for any amendments to the STCW Convention and Code.	ISWG-STCW 1/2/16

Regulation I/16
Section A-I/16
Section B-I/16

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/16, paragraph 2 Section A-I/16	The table in section A-I/16 should be revised in order to contain the required time periods/frames for each report that shall be submitted to the Secretary-General, as applicable. The term "STCW Convention and Code" has been used in the table of section A-I/16, which does not seem consistent with the terms used in the Convention and STCW Code (Convention and STCW Code).	ISWG-STCW 1/2/5
Regulation I/16, Section A-I/16 Regulations I/7, I/8 and I/10 Sections A-I/7, A-I/8 and A-I/10 Sections B-I/7, B-I/8 and B-I/10	Incorporating STCW quality standard independent evaluations (regulation I/8) into the scope of the IMSAS audit scheme and cycle, reporting and monitoring of implementation under the Convention and Code will be streamlined and reduce administrative burden for Member States.	ISWG-STCW 1/2/28

APPENDIX 3

Chapter II

Regulation II/1
Section A-II/1
Section B-II/1

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Chapter II	Including a specialized certificate for small vessels such as commercial yachts, and the corresponding competencies and the minimum KUP required for the certification.	ISWG-STCW 1/2/10
Tables A-II/1, A-II/2, A-II/3, A-II/4, A-II/5, A-III/1, A-III/2, A-III/3, A-III/4, A-III/5, A-III/6, A-III/7 and A-IV/2	The standards of competence detailed in the mentioned tables should be mapped with IMO or other instruments, thus cross-referencing competencies with necessities under other instruments. Addition of a fifth column in all the mentioned tables.	ISWG-STCW 1/2/19 Supported in principle with a note that different instruments should not downscale each other. Possibility to include other chapters.
Chapter II-VI Columns 3: All Competency Tables	<p>There is a need for standardized language to be used in column 3 of the Competence Tables in part A of the STCW Code.</p> <p>Currently, the tables identify over 40 different methods for demonstrating competence. Several tables contain KUPs and criteria for evaluating competence within column 3 (e.g. table A-VI/2-1).</p>	<p>ISWG-STCW 1/2/16</p> <p>Develop a standardized list of methods of demonstrating competence (Column 3) to eliminate inconsistencies.</p> <p>Review all tables to remove KUPs or criteria for evaluating competence from column 3. Where found, revise columns 2 and 4 as needed to ensure requirements are in the appropriate columns.</p> <p>Consider development of guidance for this standardized list of methods for demonstrating competence to be included in part B-I/6.</p>

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
<p>Regulation II/1, paragraph 2.2</p> <p>Section A-II/1 Paragraph 6.3</p>	<p>Inconsistent with the language used to describe the training record book requirements in other places throughout the Convention and Code.</p>	<p>ISWG-STCW 1/2/16</p> <p>Revise the language to consistently describe the training record book requirements throughout to read: "documented in an approved training record book or similar document" to eliminate inconsistencies and to ensure administrations have flexibility, including the use of electronic documentation.</p>
Simulation and Seagoing Service further consideration is needed, risk-based analysis		
<p>Regulation II/1</p>	<p>There are no specific guidelines regarding the exact duration or methods of the approved seagoing service.</p>	<p>ISWG-STCW 1/2/30</p> <p>Review the extent to which simulation training and other methods can substitute for the approved seagoing service related to onboard training.</p> <p>Additionally, if possible, it is also necessary to review the requirements for training ships, the duration of training, and whether additional weight should be given to training on a training ship.</p>
<p>Regulation II/1</p>	<p>Addition of new paragraphs to regulation II/1 which allow for substitution of approved seagoing service by alternative measures such as simulator training.</p>	<p>ISWG-STCW 1/2/43, annex 2</p>
<p>Regulation II/1</p>	<p>The replacement of seagoing time with simulator training should remain a possibility for Parties to the Convention and not become a requirement. The amount of seagoing time required in general,</p>	<p>ISWG-STCW 1/2/10</p>

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	as specified in the specific regulations and sections, could hereby remain with an added reference to the possibility of a limited replacement of seagoing time with simulator time.	
Tables A-II/1	Revise table to emphasize the need for more use of approved simulators during training, including various modern technologies used in the maritime industry and highlighting the Human Element.	ISWG-STCW 1/2/46
Regulation II/1 Table A-II/1, B-II/1 Tables III/1, A-III/1, B-III/1 Tables III/6, A-III/6, B-III/6	It is necessary to further review and revise the seagoing service requirements for crew promotion and evaluate their rationality and feasibility.	ISWG-STCW 1/2/25 Review tables and stipulate the minimum content and length of onboard training, then evaluate the effectiveness accordingly and determine the reasonable length of time for the "approved seagoing service". Develop and provide guidance to Parties on implementing the provisions of onboard training.
Regulations II/1 – II/5 Sections A-II/1 – A-II/5	There is no option to use approved simulator training as an alternative to meeting a portion of seagoing service requirements.	ISWG-STCW 1/2/16
Table A-II/1, column 3	The required method for demonstrating competence needs to be reviewed with consideration to the use of alternative forms of training (i.e. digital or cloud based).	ISWG-STCW 1/2/26
Table A-II/1, column 3 Table A-II/2 Table A-II/3 Table A-II/5	It is necessary to review whether there is a need to add training equipment that utilizes digitalization and emerging technologies. Such as Immersive Reality Technology (IRT) ¹ as Augmented Reality (AR), Virtual Reality (VR), Mixed Reality (MR) ² , and Metaverse.	ISWG-STCW 1/2/30
Regulation II/1, paragraph 2.2	Revise paragraph 2.2 to stipulate that every candidate for certification shall have completed not less than 12 months of combined simulator-based training and approved seagoing service of which not less than 6 months shall be seagoing	ISWG-STCW 1/2/23

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	service as part of an approved training programme which includes onboard training that meets the requirements of section A-II/1 of the STCW Code and is documented in an approved training record book.	
Competence and KUPs		
Table A-II/1, paragraph 3 Table A-II/2, paragraph 4 Table A-II/3, paragraph 3	Identified paragraphs refer to "the level of knowledge of the subjects listed in column 2 of table ...". Nevertheless, the items listed in column 2 of the tables refer not only to knowledge but also to understanding and proficiency, many of them referring to abilities to do something.	ISWG-STCW 1/2/11 Cross references should be checked to be correct.
Table A-II/1 Table A-II/2 Table A-III/3	Review the navigation and associated equipment competencies and KUPs in line with modern practices. Evaluate the inclusion of deck maintenance and instrument knowledge in the competencies to enhance operational safety. Only mentioned in table A-II/5, so it appears they cannot be performed by anyone other than the able seafarer deck without any reference to whom they must report. Competencies for deck officers should include managing deck maintenance and repair to ensure comprehensive qualifications.	ISWG-STCW 1/2/19
Table A-II/1 Table A-II/2	Current provisions lack training requirements for the use of electronic nautical publications as they are widely used and are significantly different from traditional paper publications.	ISWG-STCW 1/2/25 Evaluate the need to add competency requirements for the use of electronic nautical publications and add as appropriate.
Table A-II/1 Table A-II/2, A-II/3, A-II/4, A-II/5, A-III/1, A-III/2, A-III/3, A-III/4, A-III/5, A-III/6 and A-III/7	21st century skills such as interpersonal skills, mentoring, information management, communication, situational awareness, ability to adapt to a changing work environment, multicultural environments and different cultures, stress management, workload management, etc., are not specifically addressed by the STCW Convention and Code	ISWG-STCW 1/2/19
Tables for Operational and Management Level	New competences are proposed to cover the skills required for non-technical behavioural soft skills needed to operate in the 21st century.	ISWG-STCW 1/2/15

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	<p>The KUPs would be based upon the main elements described in document MSC 101/INF.6 as below:</p> <ul style="list-style-type: none"> .1 Team Working; .2 Communications and Influencing; .3 Situation Awareness; .4 Decision-Making; .5 Results Focus; and .6 Leadership and Managerial Skills. <p>Evaluate the need for support level requirements.</p>	
Table A-II/1	<p>Review requirements in terms of modernization for:</p> <ul style="list-style-type: none"> - Celestial Navigation (o) - Meteorology (o) - Visual Signaling (o) - Combine Bridge Resource management and Leadership & Teamworking skill (o with further consideration) 	ISWG-STCW 1/2/30
Table A-II/1 Table B-II/1	Adjust the training on celestial navigation taking into consideration the compass errors.	ISWG-STCW 1/2/10
	<p>Review the competence for determining a ship's position and update required methods, specifically:</p> <ul style="list-style-type: none"> - Celestial - Loran - Decca 	<p>ISWG-STCW 1/2/26</p> <p>Evaluate the need to update KUPs for current technology.</p>
Sections A-II/1 through A-II/5	Revision and development of new competences is needed to address advances in technology, modern terminology, taxonomy, and lessons learned. (e.g. prevalence of modern stability and celestial navigation software, integrated systems, etc.)	ISWG-STCW 1/2/16
Table A-II/1 Table B-II/1 Table A-II/2 Table A-II/3	References to celestial navigation, checking compass errors through the use of celestial bodies and the use of sextants should be deleted.	ISWG-STCW 1/2
Table A-II/1	<p>Revise table to:</p> <ul style="list-style-type: none"> - enhance seafarers' understanding of marine Emergency Response and Communication, including in mass casualty situations. - highlight relevant practical ship stability context to seafarers and ensure the crucial understanding of the Human Element in ship operations. 	ISWG-STCW 1/2/46

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	<ul style="list-style-type: none"> - highlights the latest and most relevant modern maritime/shipping operational practices, technological context, and the understanding of the Human Element. - reflect electronic chart provisions on modern ships, voyage optimization and modern technologies used in the maritime industry, including highlighting Human Element when evaluating the passage plans. 	
Table A-II/2 Table A-III/2	Mentoring is a competency which can be taught and examined just like any other competency. Proposed to include a competence for "Effective Mentoring" to ensure that all officers at the management level possess the competence to effectively mentor junior seafarers.	ISWG-STCW 1/2/14
Section B-II/1	Guidance does not consider new technology, modern terminology or taxonomy.	ISWG-STCW 1/2/16
ECDIS		
Table A-II/1 Table A-II/2	Consider consolidating ECDIS related competence requirements with those in A-II/2 to streamline training.	ISWG-STCW 1/2/19
Table A-II/1 Table A-II/2 Table A-II/3	Review the content for the operation and management of ECDIS taking into consideration the newly adopted IMO performance standards of ECDIS.	ISWG-STCW 1/2/25
Table A-II/1 Table A-II/2 Table A-II/3	<p>In cases where training and assessment in the use of Radar, ARPA or ECDIS is not required, a limitation should be noted on the certificate.</p> <p>However, section A-I/2 on "Certificates and endorsements" does not include specific provisions to ensure that those limitations identified in tables A-II/1, A-II/2 and A-II/3 are inserted in the endorsements when required.</p>	ISWG-STCW 1/2/11
Table A-II/1 Table A-II/2	The use of limitations or "negative endorsements" for ECDIS and ARPA, which are only specified as part of the competency tables, has resulted in inconsistencies in both application and interpretation.	ISWG-STCW 1/2/16

Regulation II/2
Section A-II/2
Section B-II/2

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation II/2	<p>Paragraph 4.1 is missing an "and" at the end to make it consistent with the text in regulations II/2, paragraph 2, III/2, paragraph 2.1 and III/3, paragraph 2.1.</p> <p>In addition, paragraph 4.3 is missing the word "education" to be aligned with all other similar paragraphs in chapters II and III.</p>	ISWG-STCW 1/2/11
Simulation and Seagoing Service		
Table A-II/2	Table A-II/2 should be revised to emphasize the need for more use of approved simulators during training, including various electronic resources and modern technologies used in the maritime industry	ISWG-STCW 1/2/46
Competence and KUPs		
Table A-II/2	<p>Compare requirements in Table A-II/2 for:</p> <ul style="list-style-type: none"> - "General knowledge of tankers and tanker operations" <p>With the requirements in:</p> <ul style="list-style-type: none"> - Section A-V "special training requirements for personnel on certain types of ships" <p>Identify duplications.</p>	<p>ISWG-STCW 1/2/25</p> <p>Identify duplicate requirements and remove from Table A-II/2 if appropriate</p>
Table A-II/2	<p>Review requirements for:</p> <ul style="list-style-type: none"> - Celestial Navigation - Forecast weather and oceanographic conditions - International conventions and agreements - International Medical Guide for Ships or equivalent national publications 	ISWG-STCW 1/2/30
Table A-II/2 B-II/2	Adjust the training on celestial navigation taking into consideration the compass errors.	ISWG-STCW 1/2/10
Tables A-II/2	<p>Current provisions lack training requirements for the use of electronic nautical publications as they are widely used and are significantly different from traditional paper publications.</p> <p>According to the LSA Code, lifeboat and liferaft equipment do not contain wave-quelling oil, as its use is not good for marine environment protection</p>	<p>ISWG-STCW 1/2/25</p> <p>Evaluate the need to add competency requirements for the use of electronic nautical publications and add as appropriate.</p>

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
		Delete the description "Use wave oil" in table A-II/2
Table A-II/2	Revise table to: <ul style="list-style-type: none"> - cover relevant modern shipping context, emerging technologies and modern equipment onboard, including an understanding of the Human Element and Data Science skills. - emphasize using relevant modern electronic resources, technologies, and a robust understanding of the Human Element. (O) - highlight the accuracy of position fixing and ensure seafarers' awareness of spoofing and jamming (o) 	ISWG-STCW 1/2/46
Section B-II/2	The guidance in this section references B-II/1, which may not be appropriate for management level deck officers. There may be additional guidance applicable to the management level.	ISWG-STCW 1/2/16 Evaluate if the guidance in B-II/1 is adequate for management level and revise as appropriate.

Regulation II/3
Section A-II/3
Section B-II/3

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Section A-II/3, paragraph 6.3	Inconsistent with the language used to describe the training record book requirements in other places throughout the Convention and Code.	ISWG-STCW 1/2/16 Revise the language to consistently describe the training record book requirements throughout to read: "documented in an approved training record book or similar document" to eliminate inconsistencies and to ensure administrations have flexibility, including the use of electronic documentation.
Regulation II/3	Due to emerging trends, ships of < 500 GT are now frequently engaged in international trade. The current STCW requirements for masters on such vessels are for up to 3,000 GT and relate to regulation II/2 within the same chapter. The possibility to introduce a new criterion within the STCW Code to allow for an unlimited license for masters and officers in charge of a navigational watch on vessels < 500 GT is to be reviewed.	ISWG-STCW 1/2/19
Competence and KUPs		
Table A-II/3	Column 4 "criteria for evaluating competence" includes the following text: "Interpretation and analysis of information obtained from radar is in accordance with accepted navigational practice and takes account of the limits and accuracy levels of radar". In addition, column 3 for "methods for demonstrating competence" states "assessment of evidence obtained from approved radar simulator" as the method for the competence "plan and conduct a coastal passage and determine position in relation to the "knowledge, understanding and	ISWG-STCW 1/2/11

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	<p>proficiency" (KUP) item on "navigational aids and equipment".</p> <p>However, no specific KUP item on Radar navigation is included in column 2 of this table.</p>	
Table A-II/3	<p>Review requirements for:</p> <ul style="list-style-type: none"> - Search and Rescue 	<p>ISWG-STCW 1/2/30</p> <p>Determine if reduction and combination of proposed topics is appropriate.</p>
Section B-II/3	<p>This section references B-II/1 directly. There may be additional relevant guidance applicable to the operational and management levels on "limited tonnage" ships.</p>	<p>ISWG-STCW 1/2/16</p> <p>Consider if guidance in B-II/1 is adequate for the "limited tonnage" operational and management levels and revise as appropriate.</p>

Regulation II/4
Section A-II/4
Section B-II/4

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation II/4	<p>Paragraph 1 requires "every rating forming part of a navigational watch" to "be duly certificated".</p> <p>Article II(d) defines the term "certificated" as "properly holding a certificate".</p> <p>However, the above provisions do not specify the type of certificate the seafarers concerned should hold and they do not refer to the definition of "certificate of proficiency" given in regulation I/1, paragraph 1.31.</p> <p>In addition, the associated sections of the STCW Code do not specify the certificate these seafarers should hold and do not include any reference that would clarify the type of certificate that should be issued.</p>	ISWG-STCW 1/2/11

Regulation II/5
Section A-II/5
Section B-II/5

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Expired Provisions		
Regulation II/5, paragraphs 3, 4, 5, and 6	Transitional provisions designed to facilitate the transition from previous regulations to the new requirements introduced by the 2010 Manila amendments. As a result, they may no longer be applicable or necessary in the current regulatory context.	ISWG-STCW 1/2/36
Regulation II/5, paragraph 4	Propose to remove paragraph 4 as it has not been applicable since 2012	ISWG-STCW 1/2/44
paragraph 5	Propose to remove paragraph 5 as it has not been applicable since 2017.	
Regulations II/5.4 and II/5.5 4	Transitional provisions have expired. The International Labour Organization Certification of Able Seamen Convention, 1946 (No. 74) was repealed at the 109th session of the International Labour Conference in June 2021.	ISWG-STCW 1/2/25
Regulation II/5, paragraphs 3, 4 and 5	The 1 January 2012 and 1 January 2017 dates have passed.	ISWG-STCW 1/2/16 Evaluate paragraph 3 in regulation II/5 to determine if the date needs to be updated to align with any new amendments or if the provision can be removed. Remove expired provisions in paragraphs 4 and 5 of Regulation II/5.
Regulation II/5	Paragraph 1 requires "every able seafarer deck" to "be duly certificated". Article II(d) defines the term "certificated" as "properly holding a certificate". However, the above provisions do not specify the type of certificate the seafarers concerned should hold and they do not refer to the definition of "certificate of proficiency" given in regulation I/1, paragraph 1.31. In addition, the associated sections of the STCW Code do not specify the certificate these seafarers should hold and do not include any reference that would clarify the type of certificate that should be issued.	ISWG-STCW 1/2/11

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation II/5	<p>Paragraph 2.3</p> <p>The wording "while qualified to serve as ..."</p> <p>Clarify what "while qualified" means and what is the difference between meeting the requirements for certification and being qualified for certification.</p>	ISWG-STCW 1/2/11
Regulation II/5, paragraph 2.3	The requirement to have seagoing service while qualified for RFPNW is unnecessarily burdensome to seafarers with prior navigational watchkeeping experience seeking ASD certification.	<p>ISWG-STCW 1/2/16</p> <p>Revise the provisions to allow seafarers to meet the seagoing service requirements without being qualified for RFPNW if they have served in a relevant capacity in the deck department.</p>
Regulation II/5 paragraphs 2.3.1 and 2.3.2	The seagoing service requirements are inconsistent with the correlating seagoing service requirements for able seafarer engine in Regulation III/5.	<p>ISWG-STCW 1/2/16</p> <p>Consider the appropriateness of the amount of required seagoing service in paragraphs 2.3.1 and 2.3.2 in relation to those for able seafarer engine.</p>
Table A-II/5 Section B-II/5	Inconsistency in the options of column 3 Methods for Demonstrating Competence (training record book) between Table A-II/5 and Table B-II/5.	ISWG-STCW 1/2/44
Section B-II/5	<p>Provision is very limited. Additional, more detailed guidance may be appropriate.</p> <p>The language in this section is inconsistent with the language used to describe the training record book requirements in other places throughout the Convention and Code.</p>	<p>ISWG-STCW 1/2/16</p> <p>Revise the language to consistently describe the training record book requirements throughout to read: "documented in an approved training record book or similar document" to eliminate inconsistencies and to ensure administrations have flexibility, including the use of electronic documentation.</p>

APPENDIX 4

Chapter III

Regulation III/1
Section A-III/1
Section B-III/1

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Chapter III Section A-III	Including a specialized certificate for small vessels such as commercial yachts, and the corresponding competencies and the minimum KUP required for the certification	ISWG-STCW 1/2/10
Regulation III/1	the "12 months" and "36 months" referred to in the existing text in paragraph 2.2, might be understood as referring only to the "approved seagoing service" period and not to the "combined duration of workshop skills and approved seagoing service". In addition, the term "approved" associated to the "workshop skills training" is not stated as it is for the "seagoing service".	ISWG-STCW 1/2/11
Regulation III/1, paragraph 2.2 Section A-III/1	The language is inconsistent with the language used to describe the training record book requirements in other places throughout the Convention and Code.	ISWG-STCW 1/2/16 Revise the language to consistently describe the training record book requirements throughout to read: "documented in an approved training record book or similar document" to eliminate inconsistencies and to ensure administrations have flexibility, including the use of electronic documentation.
Simulation and Seagoing Service		
Regulation III/1 Regulation III/6 B-III/1 B-III/6	There are no specific guidelines regarding the exact duration or methods of the approved seagoing service.	ISWG-STCW 1/2/30 Review the extent to which simulation training and other methods can substitute for the approved seagoing service related to onboard training (like previous decision)

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
		Additionally, if possible, it is also necessary to review the requirements for training ships, the duration of training, and whether additional weight should be given to training on a training ship.
Regulation III/1	Addition of new paragraphs to regulation III/1 which allow for substitution of approved seagoing service by alternative measures such as simulator training.	ISWG-STCW 1/2/43 Annex 2
Regulation III/1 A-III/1 B-III/1	The replacement of seagoing time with simulator training should remain a possibility for Parties to the Convention and not become a requirement. The amount of seagoing time required in general, as specified in the specific regulations and sections, could hereby remain with an added reference to the possibility of a limited replacement of seagoing time with simulator time.	ISWG-STCW 1/2/10
Regulation III/1, paragraph 2.2	Seagoing service requirement is not clear. What is the purpose of the option articulated in regulations III/1, paragraph 2.2 since under paragraph 2.4, the candidate must still have completed approved education and training and meet the standard of competence specified in section A-III/1 of the STCW Code".	ISWG-STCW 1/2/44
Regulation III/1, section B-III/1	Inconsistency in the existing title of regulation III/1 and the text in paragraph 1 refer to "officers in charge of an engineering watch in a manned engine-room or designated duty engineers in a periodically unmanned engine-room". While the provisions in regulation III/2, paragraph 2.1 and III/3, paragraph 2.1, refer to "officer in charge of an engineering watch".	ISWG-STCW 1/2/11
Regulations III/1 - III/7 Sections A-III/1 - A-III/7	There is no option to use approved simulator training as an alternative to meeting a portion of seagoing service requirements.	ISWG-STCW 1/2/16 Develop provisions for approved simulator training to be used as an alternative to a portion of seagoing service requirements.

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
<p>Regulation III/1 Table A-III/1 B-III/1</p> <p>Regulation III/6, A-III/6, B-III/6</p>	<p>It is necessary to further review and revise the seagoing service requirements for crew promotion and evaluate their rationality and feasibility.</p>	<p>ISWG-STCW 1/2/25</p> <p>Review Tables and stipulate the minimum content and length of onboard training. then evaluate the effectiveness accordingly and determine the reasonable length of time for the "approved seagoing service"</p> <p>Develop and provide guidance to Parties on implementing the provisions of onboard training.</p>
<p>Table A-III/1 Column 3</p>	<p>The required method for demonstrating competence need to be reviewed with consideration to the use of alternative forms of training (i.e. digital or cloud based)</p>	<p>ISWG-STCW 1/2/26</p>
<p>Table A-III/1 Column 3</p> <p>Table A-III/2 Table A-III/6</p>	<p>It is necessary to review whether there is a need to add training equipment that utilizes digitalization and emerging technologies. Such as Immersive Reality Technology (IRT)¹ as Augmented Reality (AR), Virtual Reality (VR), Mixed Reality (MR)², and Metaverse</p>	<p>ISWG-STCW 1/2/30</p>
Competence and KUPs		
<p>Sections A-III/1, A-III/2 and A-III/3 Tables A-III/1 and A-III/2</p>	<p>Section A-III/1 requires the addition of a new paragraph to include that an Administration may omit knowledge requirements for High Voltage installation for the engineer officer serving on ships without High Voltage installations, which are issued a certificate not valid for service on ships with High Voltage installations and renumbering of existing paragraphs.</p> <p>Table A-III/1 should be revised to align with the relevant modern shipping context and technologies, including analysis and fault finding in modern systems, robust understanding of the Human Element, and Data Science skills.</p> <p>Table A-III/1 should be revised to reflect modern propulsion and emission control systems and technologies.</p>	<p>ISWG-STCW 1/2/46</p>

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Sections A-III/1 - A-III/7	Revision and development of new competences is needed to address advances in technology, modern terminology, taxonomy, and lessons learned. (e.g. modern electrical and electronic control equipment and distribution systems, propulsion and machinery installations, etc.)	ISWG-STCW 1/2/16
Table A-III/1	<p>In Table A-II/3, function 'Navigation at operational level', competence 'Respond to emergencies', requires in column 2 that "in addition, the following material should be included for certification as master ...".</p> <p>However, in section AIII/1 paragraph 5, specified in sections A-II/1, paragraph 3, AII/2, paragraph 4, A-II/3, paragraph 3, and A-III/2, paragraph 4, the text refers to "the level knowledge of the subjects listed in column 2" (supported in terms of cross-reference)</p>	ISWG-STCW 1/2/11
Table A-III/1	Addition of "Networking, configuring IPs, computer setup, etc." to Function: Electrical, electronic and control engineering at the operational level Column 1 (Competence) Column 2 (KUP)	ISWG-STCW 1/2/37
Table A-III/1 - item 1 column 3 .1	In service experience cannot by itself be the only method of demonstrating a competence and should be coupled with an approved training or approved training programme	ISWG-STCW 1/2/44 Propose to add approved training or an approved training program as an additional method of demonstrating competence
Regulation III/1, paragraph 2.5	Duplication between the identified paragraph and the text in Table A-III/1 under the function controlling the operation of the ship and care of persons on board at the operation level.	ISWG-STCW 1/2/44 Remove duplication from started requirements for BT, PSC, AFF, Medical FA and MC.
Table A-III/1, column 2	Existing requirements do not take into consideration the advancement in technology.	ISWG-STCW 1/2/44 Propose to revise the KUPs to address advances in technology.
Table A-III/1 Table A-III/2, A-III/3, A-III/4, A-III/5, A-III/6 and A-III/7	21st Century skills such as interpersonal skills, mentoring, information management, communication, situational awareness, ability to adapt to a changing work environment, multicultural environments and different cultures, stress management, workload management, etc., are not specifically addressed by the STCW Convention and Code. Like previous	ISWG-STCW 1/2/19

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Tables for Operational and Management Level	<p>New competences are proposed to cover the skills required for non-technical behavioural soft skills needed to operate in the 21st century.</p> <p>The KUPs would be based upon the main elements described in document MSC 101/INF.6 as below:</p> <ul style="list-style-type: none"> .1 Team Working; .2 Communications and Influencing; .3 Situation Awareness; .4 Decision Making; .5 Results Focus; and .6 Leadership and Managerial Skills. <p>Evaluate the need for support level requirements.</p>	ISWG-STCW 1/2/15
Table A-III/1	<p>Review and update requirements for:</p> <ul style="list-style-type: none"> - basic knowledge related to the operation of marine diesel engine, marine gas turbines and marine boilers - maintenance work on ships - Combine ERM and L&T under "Controlling the operation of the ship and care for persons on board" <p>Compare requirements in Table A-II/1 for:</p> <ul style="list-style-type: none"> - Fire Prevention - Life Saving - Medical Aid - Leadership and Teamworking <p>With the requirements in Table A-VI/2, A-VI/3, A-VI/4 identify unnecessary duplications.</p>	ISWG-STCW 1/2/30
Section B-III/1	<p>Paragraph 3 "to document the onboard training in a training record book" is redundant to the mandatory provision in section A-III/1, paragraph 2.3.</p> <p>In addition, the text that refers to "qualified assessors" as the persons responsible for documenting the onboard training in a training record book is incorrect.</p>	ISWG-STCW 1/2/11
A-III/1, A-III/2, A-III/3 and A-III/6	<p>There are no operational training requirements for anti-pollution equipment and systems, such as exhaust gas treatment devices and ballast water treatment devices.</p>	ISWG-STCW 1/2/25
Sections A-III/1, A-III/2 and A-III/3	<p>In cases where training and assessment in types of propulsion machinery/steam boilers is not required a limitation should be noted on the certificate.</p>	ISWG-STCW 1/2/11

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	However, section A-I/2 on "Certificates and endorsements" does not include specific provisions to ensure that those limitations identified in sections A-III/1, A-III/2 and A-III/3 are inserted in the certificates and endorsements when required.	
Section A-III/1, paragraph 10 (near-coastal voyages)	Under this section, the certificate is limited to main propulsion machinery of less than 3,000 kW while the limitation is not specified in section A-III/2, paragraph 8.	ISWG-STCW 1/2/37 Deletion of the limitation of 3,000 kW
Section B-III/1	<p>The provisions of section A-III/1, paragraph 2.1 requires onboard training that takes into account the guidance given in section B-III/1.</p> <p>However, the guidance referred to has not been provided in section B-III/1.</p>	ISWG-STCW 1/2/4 It is proposed that guidance related to the onboard training be included in sections B-III/1 of the STCW Code
Section A-III/1	<p>The provisions of section A-III/1, paragraph 2.1 requires onboard training that takes into account the guidance given in section B-III/1. Paragraph 2.1 requires the approved programme of onboard training that takes into account the guidance given in section B-III/1.</p> <p>However, the guidance given in section B-III/1 concerning on board training is limited to recommend that the "onboard training should be adequately documented in a training record book by qualified assessors", which is already required, and not recommended, in paragraphs 2.2 and 2.3 of section A-III/1.</p>	ISWG-STCW 1/2/11
Section A-III/1	<p>The provisions in paragraph 7 provide for a limited certificate for service in ships in which steam boilers do not form part of their machinery.</p> <p>However, section A-I/2 on "Certificates and endorsements" does not include specific provisions to ensure that such limitation identified in section A-III/1 is inserted in certificates and endorsements when required. Like previous</p>	ISWG-STCW 1/2/11
Section A-III/1	<p>There is an inconsistency between paragraph 3 that that requires "ability" to undertake, at the operational level, the tasks, duties and responsibilities listed in column 1 of table A-III/1.</p> <p>However, the standard of competence of table A-III/1, requires the demonstration of competence, as well as with the provisions of paragraph 9 of this section, of regulation III/1 and</p>	ISWG-STCW 1/2/11

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	of section A-I/6, which provide for the achievement of the standard of competence concerned.	
Section A-III/1	When referring to the KUPs listed in column 2 of the relevant tables of competence of the STCW Code, the text in section A-III/1, paragraph 5, refers to "the level of knowledge of the material listed in column 2 of table ...", while the texts in sections A-IV/2, paragraph 4.2, A-VI/2, paragraphs 4.2, and 10.2 and A-VI/6, paragraph 8.2 refer to "the material set out in column 2 of table ..."	ISWG-STCW 1/2/11
Section B-III/1	Provision is very limited. Additional, more detailed guidance may be appropriate. (Similar to the format of section B-II/1) like previous	ISWG-STCW 1/2/16

Regulation III/2
Section A-III/2
Section B-III/2

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Simulation and Seagoing Service		
Regulation III/2	There is an inconsistency between paragraph 2.1, which requires seagoing service be performed as "officer in charge of an engineering watch", and paragraph 2.1.1, which requires seagoing service as "qualified engineer officer".	ISWG-STCW 1/2/4
Regulation III/2	The wording "as qualified engineer officer" in regulation III/2, paragraph 2.1.1 is inconsistent with the text in the previous paragraph 2.1, which requires candidates to have approved seagoing service in the capacity of an "officer in charge of an engineering watch on a seagoing ship powered by main propulsion machinery of 750 kW propulsion power or more". In addition, it is redundant with the definition of the "engineer officer" given in regulation I/1, paragraph 1.7. Moreover, the text is not consistent with the existing text in paragraph 2.1.2.	ISWG-STCW 1/2/11
Regulation III/2, paragraph 2.1	The sea service requirement is not clear. "meet the requirements for certification as an officer in charge of an engineering watch on seagoing ships powered by main propulsion machinery of 750 kW propulsion power or more"	ISWG-STCW 1/2/44 Propose to modify with the addition of "hold the certificate of competency" in order to provide

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	and have approved seagoing service in that capacity"	clarity within the existing text: "meet the requirements for certification as an officer in charge of an engineering watch on seagoing ships powered by main propulsion machinery of 750 kW propulsion power or more, hold the certificate of competency, and have approved seagoing service in that capacity".
Regulation III/2, paragraph 2.1.2	The seagoing service requirement is inconsistent with regulation III/3, paragraph 2.1.1.2. Should the seagoing service be served as a qualified second engineer or in the position of second engineer?	ISWG-STCW 1/2/44 Propose to provide clarity with the existing text to eliminate confusion around requirement
Competence and KUPs		
Table A-III/2	Review requirements for: <ul style="list-style-type: none"> - Steam Turbine - Operation and management of marine diesel engines, marine gas turbines, marine boilers, marine gas turbines, heat transmission, mechanics, and hydromechanics. - international conventions and agreements that are not directly related to ship operations. - The term "engineering publication" is too broad and should be modified to "use the operation, maintenance, and repair manual" specific to ship operation. Compare requirements in Table A-III/2 for: <ul style="list-style-type: none"> - Fire Prevention - Life Saving - Medical Aid 	ISWG-STCW 1/2/30
Table A-III/2	After blackout, necessary action and restoration of power to MSB either by manual or automatic needs to be added in competence. Words "Software version" in column 2 to be rephrased as: "Blackout, power management	ISWG-STCW 1/2/37

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	systems, awareness of power management systems, droop"	
Sections A-III/2 A-III/3	Paragraph 5 states that "Training and experience to achieveand the guidance given in part B of this Code" However, there is no guidance in part B.	ISWG-STCW 1/2/37 Addition in part B / deletion of the reference
Table A-III/2	Revise table to ensure they cover current and emerging seagoing technologies, practical problem-solving techniques, and best practices.	ISWG-STCW 1/2/46
Section A-III/2, paragraph 4	Refer to "the level of knowledge of the subjects listed in column 2 of table ...". Nevertheless, the items listed in column 2 of the tables refer not only to knowledge but also to understanding and proficiency, many of them referring to abilities to do something	ISWG-STCW 1/2/11
Table A-III/2, column 2: Table A-III/2, column 3	Existing requirements do not take into consideration the advancement in technology. Methods of demonstrating competence do not take into account approved education and training and other modern means for demonstrating competence.	ISWG-STCW 1/2/44 Propose to revise the knowledge, understanding and proficiency to address advances in technology. Propose to update the language to enable the methods of demonstrating competence to take into account approved education and training and other modern means for demonstrating competence.
Section B-III/2	No provisions currently exist for CE/2E 3000kw or more.	ISWG-STCW 1/2/16 Evaluate the need for and develop guidance as appropriate.

Regulation III/3
Section A-III/3
Section B-III/3

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation III/3	<p>Paragraph 2.1.2 The wording "while qualified to serve as ..."</p> <p>Clarify what "while qualified" means and what is the difference between meeting the requirements for certification and being qualified for certification.</p>	ISWG-STCW 1/2/11
Regulation III/3	<p>Paragraph 2.1.2 does not specify the capacity/rank at which the required seagoing service should be performed for certification as chief engineer officer</p> <p>Currently a candidate could fulfil the seagoing service requirement for certification as chief engineer officer certificate by accumulating 24 months of seagoing service as assistance engineer officer.</p>	ISWG-STCW 1/2/4
Regulation III/3, paragraph 2.1.2	There is inconsistency between regulation III/2, paragraph 2.1.2 and regulation III/3, paragraph 2.1.2 regarding the seagoing service to be served as a qualified engineer or in the position of second engineer.	<p>ISWG-STCW 1/2/44</p> <p>Modify the existing language in order to provide clarity around requirement</p>
Regulation III/3	Paragraph 2.1, which refers to an "officer in charge of an engineering watch" does not include the expression "on a seagoing ship powered by main propulsion machinery of 750 kW propulsion power or more" immediately after, as it is in stated in paragraph 2.1 of regulation III/2.	ISWG-STCW 1/2/11
Section B-III/3	No provisions currently exist.	<p>ISWG-STCW 1/2/16</p> <p>Evaluate the need for and develop guidance as appropriate.</p>
Regulations III/2 and III/3	Revise to cover seagoing ships powered by main propulsion machinery of higher kW propulsion power.	ISWG-STCW 1/2/46

Regulation III/4
Section A-III/4
Section B-III/4

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation III/4	<p>Paragraph 1 requires "every rating forming part of an engineering watch" to "be duly certificated".</p> <p>Article II(d) defines the term "certificated" as "properly holding a certificate".</p> <p>However, the above provisions do not specify the type of certificate the seafarers concerned should hold and they do not refer to the definition of "certificate of proficiency" given in regulation I/1, paragraph 1.31.</p> <p>In addition, the associated sections of the STCW Code do not specify the certificate these seafarers should hold and do not include any reference that would clarify the type of certificate that should be issued.</p>	ISWG-STCW 1/2/11
Regulation III/4, paragraph 2.2.2.1	Propose to modify the following text to include the addition of "and is documented in an approved training record book" in order to identify a means of assessing the requirement.	ISWG-STCW 1/2/44
Regulation III/4, paragraph 2.2.2.2	<p>Inconsistency with the term used for training in regulation III/4 paragraph 2.2.2.2 and section A-III/4, paragraph 3.</p> <p>"Special training, either pre-sea or on board ship, including an approved period of seagoing service which shall not be less than 2 months; and".</p> <p>Section A-III/4, paragraph 3: "The reference to practical test in evaluating the competence specified in column 3 may include approved shore-based training in which the students undergo practical testing".</p>	<p>ISWG-STCW 1/2/44</p> <p>Propose to modify the language so that one term with regards to specialized training is used consistently throughout the paragraph identified.</p>
<p>Tables A-III/4</p> <p>Table A-III/5 and A-III/7</p>	<p>Personnel do not have specific competency requirement in relation to contributing to berthing, anchoring and other mooring operations as A-II/5: ratings as able seafarer deck have.</p> <p>However, it is very common practice for these personnel to assist during mooring operations. Shipping companies address this by providing on-board familiarization, however, this is inconsistent across the industry and is a common deficiency reported by PSC. Like previous</p>	ISWG-STCW 1/2/19
Section B-III/4	The reference in the title of this section to "an engineering watch in a manned engine-room or designated to perform duties in a periodically unmanned engine-room" is redundant since both activities are equivalent in terms of competence.	ISWG-STCW 1/2/11

Regulation III/5
Section A-III/5
Section B-III/5

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Table A-III/5	<p>Add a KUP for "Basic understanding of electronic control system on equipment, like main engine, auxiliary engine, purifiers".</p> <p>Under Competence Contribute to the monitoring and controlling of an engine-room watch.</p>	ISWG-STCW 1/2/36
Regulation III/5, paragraph 2.3	Lack of clarity regarding the seagoing service and difficulty in assessing on board training and experience.	<p>ISWG-STCW 1/2/44</p> <p>Propose to provide clarity to the existing language so that a means of how training should be documented (i.e. approved training record book) is identified.</p>
Regulation III/5, paragraph 2.3	The requirement to have seagoing service while qualified for RFPEW is unnecessarily burdensome to seafarers with prior engine room watchkeeping experience seeking ASE certification. Like previous	<p>ISWG-STCW 1/2/16</p> <p>Develop provisions to allow seafarers to meet the "seagoing service requirements" if they have served in a relevant capacity in the engine department.</p>
Regulation III/5, paragraph 3	The 1 January 2012 date has passed.	ISWG-STCW 1/2/16
Regulations II/5.3	These regulations contain transitional provisions that have expired.	ISWG-STCW 1/2/25
Regulation III/5	<p>Paragraph 1 requires "every able seafarer engine" to "be duly certificated".</p> <p>Article II(d) defines the term "certificated" as "properly holding a certificate".</p> <p>However, the above provisions do not specify the type of certificate the seafarers concerned should hold and they do not refer to the definition of "certificate of proficiency" given in regulation I/1, paragraph 1.31.</p> <p>In addition, the associated sections of the STCW Code do not specify the certificate these seafarers should hold and do not include any reference</p>	ISWG-STCW 1/2/11

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	that would clarify the type of certificate that should be issued. Like previous	
Regulation III/5	<p>Paragraph 2.3 The wording "while qualified to serve as ..."</p> <p>Clarify what "while qualified" means and what is the difference between meeting the requirements for certification and being qualified for certification.</p>	ISWG-STCW 1/2/11
Table A-III/5 Column 3	Methods of demonstrating competence do not identify approved education and training and other modern means for demonstrating competence.	<p>ISWG-STCW 1/2/44</p> <p>Propose to update the language to enable the methods of demonstrating competence to identify approved education and training and other modern means for demonstrating competence.</p>
Section B-III/5	Provision is very limited. Additional, more detailed guidance may be appropriate.	<p>ISWG-STCW 1/2/16</p> <p>Evaluate the need for and develop guidance as appropriate.</p>

Regulation III/6
Section A-III/6
Section B-III/6

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation III/6, paragraph 2.2	The word "completed" is redundant. In addition, the term "approved" associated to the "workshop skills training" is not stated as it is for the "seagoing service". Like previous	ISWG-STCW 1/2/11
Regulation III/6, paragraph 2.2 Section A-III/6	The language is inconsistent with the language used to describe the training record book requirements in other places throughout the Convention and Code.	ISWG-STCW 1/2/16
Regulation III/6, paragraph 3	The 1 January 2021 date has passed.	ISWG-STCW 1/2/16
Regulations III/6.3	These regulations contain transitional provisions that have expired.	ISWG-STCW 1/2/25
Regulation III/6, paragraph 2.2	Seagoing service requirement is not clear. What is the purpose of the option regarding the extended seagoing service articulated in regulations III/6 paragraph 2.2 since under paragraph 2.3, the candidate must still "have completed approved education and training and meet the standard of competence specified in section A-III/6 of the STCW Code". Like previous	ISWG-STCW 1/2/44 Propose to modify the existing language to provide clarity with regards to the existing requirements.
Regulation III/6, paragraph 2.4	The purpose of paragraph 2.4 in regulation III/6 is unclear since these requirements are stated in table A-III/6 under the function 3, controlling the operation of the ship and care of persons on board at the operation level. Like previous	ISWG-STCW 1/2/44 Propose to provide clarity with regards to the purpose of the paragraph or remove the paragraph all together to reduce duplication.
Section A-III/6 Section B-III/6	There is inconsistency with the scope of application of onboard training between paragraph 2.2 of Regulation III/6 and paragraph 2 of section A-III/1. Paragraph 2.2 of Regulation III/6 mandates only those candidates who choose to follow the shorter route (12 months) to follow an approved onboard training programme whereas section A-III/6, paragraph 2 are applicable to every candidate. Additionally, sections B-II/1 and B-V/1 of the STCW Code provide guidance regarding the	ISWG-STCW 1/2/4 It is proposed that guidance related to the onboard training be included in section B-III/6 of the STCW Code

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	onboard training, whereas section B-III/6 lacks such guidance.	
Section A-III/6	<p>Paragraph 5 indicates that "every candidate for certification shall be required to provide evidence of having achieved the required standard of competence tabulated in columns 3 and 4 of table A-III/6".</p> <p>However, those columns only provide the methods for demonstrating competence and the criteria for evaluating competence.</p>	<p>ISWG-STCW 1/2/11</p> <p>Similar provisions in sections A-III/1, A-III/2 and A-III/3 state that "every candidate for certification shall be required to provide evidence of having achieved the required standard of competence in accordance with the methods for demonstrating competence and the criteria for evaluating competence tabulated in columns 3 and 4 of table A-III/1, or A-III/2, or A-III/3", as appropriate.</p>
Table A-III/6, III/1, III/2, III/3	Add training on AI, 3D printing, and IoT within the competences.	ISWG-STCW 1/2/19
Table A-III/6 Column 3	Methods of demonstrating competence do not include approved education and training to be used as a method of demonstrating competence. Like previous	<p>ISWG-STCW 1/2/44</p> <p>Propose to amend the existing language to incorporate approved education and training as a means of demonstrating competence.</p>
Table A-III/6	Revise to cover current and emerging technologies, their use on seagoing ships and associated Human Element considerations. Like previous	ISWG-STCW 1/2/46
Section B-III/6	Provision is very limited. Additional, more detailed guidance may be appropriate. Like previous	<p>ISWG-STCW 1/2/16</p> <p>Evaluate the need for and develop guidance as appropriate.</p>

Regulation III/7
Section A-III/7
Section B-III/7

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulations III/7.3 5	These regulations contain transitional provisions that have expired.	ISWG-STCW 1/2/25
Regulation III/7, paragraph 2.2	Difficulty in assessing onboard training and experience.	ISWG-STCW 1/2/44 Propose to provide clarity to the existing language so that a means of how training should be documented (i.e. approved training record book) is identified.
Regulation III/7, Paragraphs 2.2.2.1, 2.2.2.2 and 2.2.2.3	Existing language regarding required seagoing service is inconsistent and not in line with the training, experience or qualifications identified in the standard of competence specified in section A-III/7 of the STCW Code.	ISWG-STCW 1/2/44 Propose to amend the existing language in order to harmonize various requirements.
Regulation III/7, paragraph 3	The 1 January 2012 date has passed.	
Regulation III/7, section A-III/7	Paragraph 1 requires "every electrotechnical rating" to "be duly certificated". Article II(d) defines the term "certificated" as "properly holding a certificate". However, the above provisions do not specify the type of certificate the seafarers concerned should hold and they do not refer to the definition of "certificate of proficiency" given in regulation I/1, paragraph 1.31. In addition, the associated sections of the STCW Code do not specify the certificate these seafarers should hold and do not include any reference that would clarify the type of certificate that should be issued.	ISWG-STCW 1/2/11
Table A-III/7, column 3	Methods of demonstrating competence do not identify approved education and training and other modern means for demonstrating competence.	ISWG-STCW 1/2/44 Propose to update the language to enable the methods of demonstrating competence to identify approved education and training.

APPENDIX 5

Chapter IV

Regulation IV/1
Section A-IV/1
Section B-IV/1

Regulation IV/2
Section A-IV/2
Section B-IV/2

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Chapter IV	Revision and development of new competences is needed to address advances in technology, modern terminology, taxonomy, and lessons learned. (e.g. prevalence of new satellite-based communications, etc.)	ISWG-STCW 1/2/16 Revise existing competences and develop new competences to address advances in technology, modern terminology and taxonomy, and lessons learned.
Section B-IV/1	Guidance may need to be updated based on potential changes to section A-IV/2.	ISWG-STCW 1/2/16
Section A-IV/2	Clarity regarding Radio Regulations is needed. (Note: The term appears 43 times throughout the Convention and Code but is only identified as the International Telecommunication Convention in paragraph 2 of section B-IV/2.)	ISWG-STCW 1/2/16 Clarify that the Radio Regulations refers to the International Telecommunication Convention in the definitions of radio operator and radio duties (Regulation I/1, paragraphs 1.11 and 1.16).
Table A-IV/2, paragraph 3	Refers to "the level of knowledge of the subjects listed in column 2 of table ...". Nevertheless, the items listed in column 2 of the tables refer not only to knowledge but also to understanding and proficiency, many of them referring to abilities to do something like previous	ISWG-STCW 1/2/11
Table- A-IV/2	The required method for demonstrating competence need to be reviewed with consideration to the use of alternative forms of training (i.e digital or cloud based)	ISWG-STCW 1/2/26

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Table A-IV/2	<p>Amendment to SOLAS chapter IV (January 2024.) In the said amendment, portable radio life-saving equipment has been taken out from SOLAS chapter III and added to SOLAS chapter IV. Amend Column 1 to add: "Transmit and receive information using GMDSS subsystems and equipment including portable radio lifesaving equipment (EPIRB-AIS, AIS-SART, portable VHF radio and Aeronautical VHF radio) and reserve source batteries and fulfilling the functional requirements of GMDSS."</p> <p>Include competency related to battery management, covering maintenance, monitoring, safe disposal, and replacement procedures.</p>	ISWG-STCW 1/2/38
Table A-IV/2	<p>Column 3 (Methods for demonstrating competence)</p> <p>It is necessary to review whether there is a need to add training equipment that utilizes digitalization and emerging technologies.</p> <p>such as Immersive Reality Technology (IRT)¹ as Augmented Reality (AR), Virtual Reality (VR), Mixed Reality (MR)², and Metaverse</p>	ISWG-STCW 1/2/30
B-IV/2	<p>Amendment to training related to the General Operator's Certificate:</p> <p>Additional topics suggested in paragraph 32 to include:</p> <ul style="list-style-type: none"> - Emergency position-indicating radio beacons (EPIRB-AIS) - Search and rescue transmitter capable of operating on AIS frequencies (AIS-SART) - Search and rescue transponder capable of operating on X-band Radar frequencies (Radar SART) - Aeronautical VHF for on-scene radio communications for SAR - Maritime Safety Information (MSI) and power supply systems and its uses <p>Additional topics suggested in paragraph 35.4 to include:</p> <ul style="list-style-type: none"> - 4.5 for use of NAVTEX receiver and EGC receiver. - 4.6 for use of AIS-SART, Radar SART, EPIRB-AIS and Aeronautical VHF radio. 	ISWG-STCW 1/2/38

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	<ul style="list-style-type: none"> - 4.7 for operation, maintenance and replacement of reserve source batteries and its charging arrangement. 	
B-IV/2	<p>Amendment to training related to the Restricted Operator's Certificate:</p> <p>Additional topics suggested in paragraph 40 to include:</p> <ul style="list-style-type: none"> - Emergency position-indicating radio beacons (EPIRB-AIS) - Search and rescue transmitter capable of operating on AIS frequencies (AIS-SART) - Search and rescue transponder capable of operating on X-band Radar frequencies (Radar SART) - Aeronautical VHF for on-scene radio communications for SAR - Maritime Safety Information (MSI) and power supply systems and its uses <p>Additional topics suggested in paragraph 43.3 to include:</p> <ul style="list-style-type: none"> - 3.5 for use of AIS-SART, Radar SART, EPIRB-AIS and Aeronautical VHF radio. - 3.6 for operation, maintenance and replacement of reserve source batteries and its charging arrangement." <p>Simulation of Emergency Communication Scenarios: Incorporate simulated emergency communication exercises into practical training.</p>	ISWG-STCW 1/2/38

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
B-IV/2	<p>Amendment to training related to the First Class Radioelectronic Certificate:</p> <p>Additional topics suggested in paragraph 6 to include:</p> <ul style="list-style-type: none"> - Emergency position-indicating radio beacons (EPIRB-AIS) - Search and rescue transmitter capable of operating on AIS frequencies (AIS-SART) - Search and rescue transponder capable of operating on X-band Radar frequencies (Radar SART) - Aeronautical VHF for on-scene radio communications for SAR - Maritime Safety Information (MSI) and power supply systems and its uses <p>Additional topics suggested in paragraph 13.4 to include:</p> <ul style="list-style-type: none"> - 4.5 for use of NAVTEX receiver and EGC receiver. - 4.6 for use of AIS-SART, Radar SART, EPIRB-AIS and Aeronautical VHF radio. - 4.7 for operation, maintenance and replacement of reserve source batteries and its charging arrangement <p>Introducing modern considerations such as cybersecurity and troubleshooting of advanced communication systems</p>	ISWG-STCW 1/2/38
B-IV/2	<p>Amendment to training related to the Second Class Radioelectronic Certificate:</p> <p>Additional topics suggested in theory clause-20:</p> <ul style="list-style-type: none"> - Search and rescue transmitter capable of operating on AIS frequencies (AIS-SART) - Search and rescue transponder capable of operating on X-band Radar frequencies (Radar SART) - Maritime Safety Information (MSI) and power supply systems and its uses <p>Additional topics suggested in practical clause-27.4 to include:</p> <ul style="list-style-type: none"> - 4.5 for use of NAVTEX receiver and EGC receiver. - 4.6 for use of AIS-SART, Radar SART, EPIRB-AIS and Aeronautical VHF radio. 	ISWG-STCW 1/2/38

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	<ul style="list-style-type: none"> - 4.7 for operation, maintenance and replacement of reserve source batteries and its charging arrangement <p>Add simulated emergency response scenarios + Hands on training involving all types of / latest GMDSS equipment.</p> <p>Add cybersecurity training for GMDSS</p>	
Section B-IV/2	<p>1. In the documentation system related to GMDSS, it is more accurate to use term "recognized satellite system";</p> <p>2. Resolution MSC.514(105), replaces A.814(19) with effect from 1 January 2024. Paragraphs 26.9, 34.9 and 42.7 of section B-IV/2 refer to footnote documents that expired on 1 January 2024.</p>	<p>ISWG-STCW 1/2/25</p> <p>1. Replace the phrase "satellite system" as used in paragraphs 4, 18 and 32 of section B-IV/2 with "recognized satellite system";</p> <p>2. Revise the footnote cited in paragraphs 26.9, 34.9 and 42.7.</p>

APPENDIX 6

Chapter V

Regulation V/1-1

Section A-V/1-1

Table V/1-1-1

Table V/1-1-2

Table V/1-1-3

Regulation V/1-2

Section A-V/1-2

Table V/1-2-1

Table V/1-2-2

Section B-V/1

Section B-V/1-1

Section B-V/1-2

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulations V/1-1 - V/4 Sections A-V/1-1 - A-V/4	There is no option to use approved simulator training as an alternative to meeting a portion of seagoing service requirements.	ISWG-STCW 1/2/16 Develop provisions for approved simulator training to be an alternative to a portion of seagoing service requirements. Amend appropriate sections in part A to establish a maximum amount of approved simulator training that can be used as an alternative to seagoing service.
Tables A-V/1-1-1 - A-V/4-2	Revision and development of new competences is needed to address advances in technology, modern terminology, taxonomy, and lessons learned. (e.g. tanker cargo operations)	ISWG-STCW 1/2/16 Revise existing and develop new competences to address advances in technology, modern terminology and taxonomy, and lessons learned.
Regulations V/1-1 and V/1-2	The language in paragraphs 4.2.2 and 6.2.2 (regulation V/1-1) and 4.2.2 (regulation V/1-2) is inconsistent with the language used to describe the training record book requirements in other places throughout the Convention and Code.	ISWG-STCW 1/2/16 Revise the language to consistently describe the training

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
		record book requirements throughout to read: "documented in an approved training record book or similar document" to eliminate inconsistencies and to ensure administrations have flexibility, including the use of electronic documentation.
Regulation V/1-1, paragraph 2.1	Clarify Seagoing service requirement. What is the purpose of the option articulated in regulations V/1-1, paragraph 2.1 since the standard of competence cannot be met with only in service experience. identified.	ISWG-STCW 1/2/44 Propose to amend existing language to provide clarity for the requirements identified.
Regulation V/1-1, paragraphs 3 and 5 Regulation V/1-2, paragraph 3	The phrase "any person with immediate responsibility" is ambiguous. Section B-V/1 provides guidance on the term, however, is open to different interpretations.	ISWG-STCW 1/2/19 Clarify the meaning
Regulation V/1-1, section B-V/1	The phrase the phrase "any person with immediate responsibility" is explained in Section B-V/1. However, this definition can still lead to different interpretations.	ISWG-STCW 1/2/25
Regulation V/1-1	Clarify what "while qualified" means and what is the difference between meeting the requirements for certification and being qualified for certification.	ISWG-STCW 1/2/11
Table A-V/1-1-3	Amendments to the criteria for evaluating competence in table A-V/1-1-3 that would enhance the effectiveness of the competence and promote operational efficiency and safety onboard chemical tankers.	ISWG-STCW 1/2/17
Regulation V/1-1, paragraphs 4.2.1 and paragraph 4.2.2	The seagoing service requirement including loads/discharges is an obstacle to seafarers. Options other than the minimum "three months of approved seagoing service on tankers" or "one month of onboard training on tankers, in a supernumerary capacity, which includes at least three loading and three unloading operations during that time" need to be considered to increase flexibility in mobility of seafarers across different ship types, for an example, tanker simulator training	ISWG-STCW 1/2/30

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation V/1-1	<p>Paragraphs. 2.1, 4.2.1 and 6.2.1 – Evaluate the implications of tankers being constructed as combination carriers (oil/chemical) and the resultant training requirements.</p> <p>Paragraphs 4.1 and 6.1 – A candidate for a certificate in advanced training on oil OR chemical tanker should meet the requirements for certification in basic training for oil OR chemical tankers, as appropriate.</p> <p>Paragraphs 4.2, 6.2– the phrase "while qualified for certification in basic training"; is ambiguous and open to interpretation.</p>	ISWG-STCW 1/2/19
Table V/1-1-1 Table V/1-1-2 Table V/1-1-3	The required method for demonstrating competence need to be reviewed to determine whether there is a need to add training equipment that utilizes digitalization and emerging technologies such as: Immersive Reality Technology (IRT) ¹ as Augmented Reality (AR), Virtual Reality (VR), Mixed Reality (MR) ² , and Metaverse.	ISWG-STCW 1/2/30
Table V/1-1-1 Table V/1-1-2 Table V/1-1-3	The required method for demonstrating competence need to be reviewed with consideration to the use of alternative forms of training (i.e digital or cloud based)	ISWG-STCW 1/2/26
Section B-V/1	<p>The numbering of this section may be confusing as there is no section A-V/1.</p> <p>Paragraph 9, includes terms referring the "appropriate certificate, issued or endorsed or validated" is not aligned with the terms used in the Annex to the Convention and in part A of the Code.</p> <p>Paragraph 2.6 of section B-VI/1 does not include text relevant to fire-fighting involving water-reactive materials.</p>	ISWG-STCW 1/2/11
Regulation V/1-2, paragraph 2.1	<p>Clarify Seagoing service requirement.</p> <p>What is the purpose of the option articulated in regulations V/1-2, paragraph 2.1 since the standard of competence cannot be met with only in service experience. Like previous</p>	<p>ISWG-STCW 1/2/44</p> <p>Propose to amend existing language to provide clarity for the requirements identified.</p>
Regulation V/1-2, paragraph 3	The phrase "any person with immediate responsibility" is ambiguous. Section B-V/1 provides guidance on the term, however, is open to different interpretations.	<p>ISWG-STCW 1/2/19</p> <p>Clarify the meaning</p>

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation V/1-1, section B-V/1	The phrase the phrase "any person with immediate responsibility" is explained in Section B-V/1. However, this definition can still lead to different interpretations.	ISWG-STCW 1/2/25
Table A-V/1-2-1	Amendments to the KUPs that would enhance the effectiveness of the KUPs and promote operational efficiency and safety on board the gas tankers.	ISWG-STCW 1/2/2
Regulation V/3	<p>Paragraphs 4.2 – Examine the impact of the limited number of such ships on training requirements, especially as new fuels are incorporated under the IGF Code or other relevant instrument, this requirement is open to differing interpretations.</p> <p>Paragraph 4.2 – the phrase "while qualified for certification in basic training"; is ambiguous and open to interpretation.</p>	ISWG-STCW 1/2/19
Regulation V/1-2	<p>The seagoing service requirement including loads/discharges is an obstacle to seafarers.</p> <p>Options other than the minimum "three months of approved seagoing service on liquefied gas tankers" or "one month of onboard training on liquefied gas tankers, in a supernumerary capacity, which includes at least three loading and three unloading operations during that time" need to be considered to increase flexibility in mobility of seafarers across different ship types, for an example, tanker simulator training</p>	ISWG-STCW 1/2/30
Table A-V/1-2-1 Table A-V/1-2-2	The required method for demonstrating competence need to be reviewed to determine whether there is a need to add training equipment that utilizes digitalization and emerging technologies such as: Immersive Reality Technology (IRT) ¹ as Augmented Reality (AR), Virtual Reality (VR), Mixed Reality (MR) ² , and Metaverse.	ISWG-STCW 1/2/30

Regulation V/2
Section A-V/2
Table V/2-1
Table V/2-3
Section B-V/2

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation V/2 Section A-V/2	Add a new competence for effective use of the information provided by the onboard computers on passenger ships or shore-based support as well as cooperation and decision making after a flooding casualty.	ISWG-STCW 1/2/10
Sections A-II/1, A-II/2, A-III/1 and A-III/3, or A-VI/3	Add requirements on the ability of seafarers on ro-ro passenger ships to cope with fires caused by new energy vehicles.	ISWG-STCW 1/2/25

Regulation V/3
Section A-V/3
Table V/3-1
Table V/3-3
Section B-V/3

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation V/3.8	It is proposed that the necessity of obtaining the basic IGF CoP prior to attending advanced IGF training be reviewed to check	ISWG-STCW 1/2/26
Regulation V/3	The seagoing service requirement including bunker operations is an obstacle to seafarers. For ships subject to IGF Code options other than the minimum "at least one month of approved seagoing service, including three bunkering operations on ships subject to IGF Code", "two of the three bunkering operations may be replaced by approved simulator training on bunkering operations" need to be considered to increase flexibility in mobility of seafarers across different ship types, for an example, tanker simulator training	ISWG-STCW 1/2/30
Regulation V/3, paragraph 5	Requires candidates for certification in basic training for service on ships subject to the IGF Code to complete "basic training in accordance with provisions of section A-V/3, paragraph 1 of the STCW Code" but it does not require them to meet the standard of competence specified therein.	ISWG-STCW 1/2/11
Regulation V/3.8.2	It is proposed that alternative measures, including simulator but not limited to, in lieu of the "one month of approved seagoing service" requirement for obtaining the IGF advanced CoP be considered.	ISWG-STCW 1/2/26
Regulation V/3, paragraph 8.2	The seagoing service requirement does not provide flexibility for the use of onboard training in a supernumerary capacity.	ISWG-STCW 1/2/16 Amend the provision to allow seafarers to meet the seagoing service requirement of this section through onboard training in a supernumerary capacity. (e.g. similar to the provisions for tankers in paragraph 4.2.2 of regulations V/1-1 and V/1-2) Evaluate the appropriateness of

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
		including guidance in section B-V/3 to allow for alternative methods for meeting the requirements of regulation V/3.
Regulation V/3, paragraph 8	Does not require candidates for certification in advance training for service on ships subject to the IGF Code to meet requirements for certification in basic training for service on ships subject to the IGF Code.	ISWG-STCW 1/2/11
Regulation V/3, paragraph 8	Provide an allowance for seagoing service to be fulfilled through approved simulator training on bunkering operations. With an option of having completed bunkering operations simulation, which includes road tanker to ship, bunker ship/barge to ship, port terminal to ship, and bunkering station mimic training in an approved training on bunkering operations, using simulator, immersive technology, and bunkering operation replica, as part of the training in regulation V/3, paragraph 8.1.	ISWG-STCW 1/2/24
Regulation V/3, paragraph 8	Revision of paragraph 8 or addition of a new paragraph to provide more flexibility in order to allow substitution by simulator training for bunkering operations on board and seagoing service experience.	ISWG-STCW 1/2/43 Annex 3
Regulation V/3, paragraph 8.2	Revise to allow the seafarer to demonstrate an equivalent level of competency using other acceptable experience to an Administration for the issue of an advance certificate of proficiency for service on ships subject to the IGF Code.	ISWG-STCW 1/2/46
Regulation V/3, paragraph 8.2	The combined sea-time and operational requirement specified is difficult to achieve due to the scarcity of such specialized ships and is exasperated by the number of seafarers working on dual-fuel enabled ships that necessitate compliance with certification.	ISWG-STCW 1/2/19
Regulation V/3, paragraph 12	Reword as follows: "Undertake appropriate refresher training or be required to provide evidence of having achieved the required standards of competence within the previous five years, in accordance with section A-I/11, paragraph 3a."	ISWG-STCW 1/2/39 Proposed text for section A-I/11, paragraph 3a of the STCW Code: "Continued professional competence for ships operating with fuels listed under the IGF Code"

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
		requirements as required under regulation I/11, paragraph 3a shall be established by: .1 approved seagoing service, performing duties appropriate to the IGF certificate or endorsement held, for a period of at least one month in total, during the preceding five years; or .2 successfully completing an approved relevant training course or courses"
Regulation V/3, paragraph 12	The provision of "at intervals not exceeding five years" may be difficult to comply with it in the event of an inevitable situation such as a pandemic or exceptional circumstances	ISWG-STCW 1/2/30
Regulation V/3, paragraph 12	Inconsistency identified in the requirement to undertake appropriate refresher training or be required to provide evidence of having achieved the required standard of competence at intervals not exceeding five years.	ISWG-STCW 1/2/44 Amend Since the required standard of competence was met when the seafarer obtained the certificate of competency under paragraph 4 or under paragraph 6, propose to amend the language so that it can consider, at intervals not exceeding five years, that continued professional competence be established by approved seagoing service. Additionally, regulation I/11, paragraph 1 should be amended to allow the introduction of a

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
		new provision similar to regulation I/11, paragraph 3 for masters, officers and rating and other personnel serving on board ships subject to the IGF Code.
Section A-V/3	<p>The headings "basic training for ships subject to the IGF Code" and "advanced training for ships subject to the IGF Code" are not consistent with the text in paragraphs 1 and 2 since that text establishes the standard of competence, which comprises both training and assessment of competence.</p> <p>Paragraphs 1.1.1 and 2.1.1 provide that every candidate for a certificate in basic training or advanced training, as appropriate, shall have successfully completed the approved basic or advanced training required by regulation V/3, "in accordance with their capacity, duties and responsibilities as set out in table" A-V/3-1 or A-V/3-2, as appropriate.</p> <p>However, those tables do not specify any capacity, duties, or responsibilities.</p>	ISWG-STCW 1/2/11

Regulation V/4
Section A-V/4
Table V/4-1
Table V/4-2
Section B-V/4

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation V/4 Section A-V/4	<p>Revise section A-V/4 to include minimum competences for all seafarers serving on board ships in polar waters.</p> <p>Introduce polar-specific familiarization for all other seafarers on board.</p> <p>Require A-V/4-1 Basic Training for all seafarers that have designated safety or pollution-prevention duties in the operation of the ship according to section A-VI/1 of the STCW Code, not only the master and deck officers.</p>	ISWG-STCW 1/2/45
Regulation V/4	<p>Requires candidate for advanced certification for ships operating in polar waters to have relevant approved seagoing service at the management level or while performing watchkeeping duties at the operational level "within polar waters or other equivalent approved seagoing service" and to complete relevant approved advanced training.</p> <p>However, it does not require candidates to complete the above requirements while qualified for certification in basic training for ships operating in polar waters</p>	ISWG-STCW 1/2/11
Regulation V/4, paragraph 2	Existing language require training when in Table A-V/4-1, Column 3: Methods of Demonstrating Competence indicates that all requirements could be achieved by one or more of the items listed in the table. As it is currently identified, one could argue that training would not be required and only in service experience could be accepted.	ISWG-STCW 1/2/44 Clarity Requirement: Propose to amend existing language to provide clarity for the requirements identified.
Regulations V/4.6 and V/4.7	These regulations contain transitional provisions that have expired.	ISWG-STCW 1/2/25
Regulation V/4, paragraph 6 paragraph 7	Propose to remove paragraphs 6 and 7 of regulation V/4 as the transition period ended July 1st, 2020.	ISWG-STCW 1/2/44
Regulation V/4, paragraph 6 paragraph 7	The 1 July 2020 date has passed.	ISWG-STCW 1/2/16 Remove expired provisions.
Section B-V/4 (formerly B-V/g)	Section title does not align with mandatory provisions in section A. The mandatory provisions apply to masters and deck officers while the guidance applies to masters and officers (including engineer officers).	ISWG-STCW 1/2/16

Section B-V/a
Section B-V/b
Section B-V/c
Section B-V/d
Section B-V/e
Section B-V/f

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Section B-V/a	The guidance in paragraphs 1, 2 and 3 address areas for experience and familiarization of prospective masters and chief mates. This is more appropriately addressed under section B-I/14 Responsibilities of Companies. Note: The guidance in paragraph 2 should also be considered generally applicable to all officers with responsibility for navigational safety.	ISWG-STCW 1/2/16 Consider moving the guidance in paragraphs 1, 2 and 3 to section B-I/14. Consider refocusing these paragraphs on "ships of special design or with unusual manoeuvring characteristics," as the thresholds for "large ships" and "considerable deadweight or length" are subjective.
Section B-V/b Section B-V/c Section B-V/d Section B-V/e Section B-V/f	There are no correlating mandatory provisions.	ISWG-STCW 1/2/16 Determine if mandatory provisions are necessary. Ensure guidance is aligned with the requirements of other IMO and relevant instruments. Incorporate specific references to all relevant instruments within the text of each provision to facilitate clarity and ease of use. (e.g. MODU Code, OSV Code, IMCA M117, etc.)

New Sections Proposed in Regulation V

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	Special training requirements for persons working dynamic positioning vessels.	ISWG-STCW 1/2/39
	As Dynamic Positioning technology becomes more prevalent on conventional ships, exploring the potential for the STCW Convention to address training comprehensively for seafarers utilizing such technologies could be beneficial. Development of requirements on such ships to be placed within chapter V of the Convention, the associated competences and KUPs related to Dynamic Positioning to be placed within parts A and B of chapter V of the STCW Code.	ISWG-STCW 1/2/19
	Paragraph 4 of Section B-V/a (dynamically supported and high-speed craft) may be more appropriate for inclusion as its own section. (e.g. similarly to that of MOU and OSV)	ISWG-STCW 1/2/16 Develop a new, lettered guidance section for dynamically supported and high-speed craft. (Similar to the format of sections B-V/d and B-V/f.)

APPENDIX 7

Chapter VI

Regulation VI/1
Section A-VI/1
Table A-VI/1-1
Table A-VI/1-2
Table A-VI/1-3
Table A-VI/1-4

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Chapter VI	STCW Code chapter VI requires under the various sections that seafarers be required to provide evidence of having achieved the required standard of competence to undertake the tasks, duties and responsibilities listed in the relevant columns of the tables every five years and to provide evidence of having maintained the required standard of competence.	ISWG-STCW 1/2/11 If a CoP for Chapter VI training does not have an expiry date, it should be clarified what is meant by 'every five years'. For example, if a training course is undertaken three years after the issue of the first CoP is this evidence valid to update the CoP for a further five years from the five-year anniversary date.
Regulation VI/1, paragraph 2	Revise to ensure clarity. (e.g. referring to generic certificates)	ISWG-STCW 1/2/16 Clarify that language regarding training "not included in the qualification for the certificate to be issued" refers to a Certificate of Competence in regulation VI/1.
Regulation VI/1 Regulation VI/3 Regulation VI/4 Regulation VI/6	Inconsistent use of terminology: "a course in ... training", "the course in ... training" or "a course of training in ...". Although regulations require candidates to meet the standards of competence specified in the Code, in addition to completing the relevant training, the text in regulations VI/1, paragraph 2,	ISWG-STCW 1/2/11

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	<p>VI/3 paragraph 2, VI/4 paragraph 3, and VI/6 paragraphs 2 and 5 requires issuing a certificate of proficiency "indicating that the holder has attended a course ...", which is inconsistent.</p> <p>Stating in a certificate of proficiency that the holder has attended a course does not ensure that the holder also demonstrated his/her competence, because a simple attendance to a course does not involve any assessment or evaluation.</p>	
Sections A-VI/1 - A-VI/6	Revision and development of new competences is needed to address advances in technology, modern terminology, taxonomy, and lessons learned. (e.g. advances in fire science, cyber security, enclosed lifeboats, etc.)	ISWG-STCW 1/2/16
Section A-VI/1	<p>Paragraph 1 The text refers to "familiarization training in personal survival techniques".</p> <p>However, the items listed immediately below also refer to "the use of portable fire extinguishers", "action upon a medical emergency" and "close and open the fire, weathertight and watertight doors", which go beyond the scope of the personal survival techniques.</p> <p>Regulation I/14, paragraph 1.5, the "familiarization training" is ship specific and is completed on board. Therefore, it is difficult to assume that all such training will be approved by the Administration.</p> <p>Moreover, as long as such "familiarization training" could be replaced by "sufficient information or instruction", which, according to paragraph 1 of this section, is not required to be approved, it is doubtful that the shipowners will apply for approval of such training.</p>	ISWG-STCW 1/2/11
Section A-VI/1, paragraph 3	<p>In light of practical operations and developments in emerging technologies, it is recommended to review the onboard training and qualification subjects as evidence of maintaining standards of competency.</p> <p>Add subjects that can be completed through onboard training under current conditions, such as "don and use the immersion suit".</p>	ISWG-STCW 1/2/25
Table A-VI/1-1 (PST)	Training in Free fall lifeboat and davit launched liferaft may be included in column 2.	ISWG-STCW 1/2/40

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Section A-VI/1, paragraph 3	The requirement of "shall be required, every five years", may make it difficult to comply with it in the event of an inevitable situation such as a pandemic or exceptional circumstances.	ISWG-STCW 1/2/30
Table A-VI/1-3	The minimum standard of competence in elementary first aid in table AVI/1-3 does not include rescue knowledge of personnel in enclosed spaces.	ISWG-STCW 1/2/25
Section B-VI/1	Fire fighting and prevention guidance needs to be updated to reflect advances in fire science and modern terminology. (i.e. use of fire tetrahedron, dangers of exposure to fire fighting chemicals, etc.)	ISWG-STCW 1/2/16 Revise fire fighting and prevention parts of section B-VI/1 to address modern terminology, advances in fire science and training.
A-V/1-1-1 A-V/1-1-2	The competence to "apply occupational health and safety precautions & measures" and associated KUPs should be added to table A-VI/1-2 (fire prevention and fire fighting)	ISWG-STCW 1/2/10

Regulation VI/2
Section A-VI/2
Table A-VI/2-1
Table A-VI/2-2

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation VI/2, paragraph 1 paragraph 2	<p>Specifies the requirements to be complied with by "every candidate for a certificate of proficiency in survival craft and rescue boats other than fast rescue boats" and for "every candidate for a certificate of proficiency in fast rescue boats", respectively.</p> <p>However, those candidates are not specified as they are in other regulations, for example, in regulation VI/3 for "seafarers designated to control fire-fighting operations [...]" or in regulation VI/4, paragraphs 1 and 2 for "seafarers designated to provide medical first aid [...]" or for "seafarers designated to take charge of medical care [...]", respectively.</p> <p>Moreover, the provisions of regulations II/1 paragraph 2.6, II/3 paragraphs 4.5 and 6.4, III/1 paragraph 2.5 and III/6 paragraph 2.4 require the candidates concerned to meet the standard of competence specified in section A-VI/2 paragraphs 1 to 4, in survival craft and rescue boats other than fast rescue boats.</p> <p>However, the provisions of regulation VI/2, paragraph 1 are not consistent with the above provisions, since regulation VI/2, paragraph 1 requires candidates not only to meet the standard of competence specified in section A-VI/2, paragraphs 1 to 4, but also to have approved seagoing service or/and attend an approved training course.</p>	ISWG-STCW 1/2/11
Section A-VI/2, paragraph 2 paragraph 8	Refer to "the level of knowledge of the subjects listed in column 2 of table ...". Nevertheless, the items listed in column 2 of the tables refer not only to knowledge but also to understanding and proficiency, many of them referring to abilities to do something	ISWG-STCW 1/2/11
Section A-VI/2	The heading of this section "mandatory minimum requirements for the issue of certificates of proficiency certification in survival craft, rescue boats and fast rescue boats" is not consistent with the requirements provided below since these are requirements for certification of having met the competences concerned and not for merely issuing the relevant certificate. supported	ISWG-STCW 1/2/11

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Section A-VI/2, paragraphs 5 and 11	The requirement of "shall be required, every five years", may make it difficult to comply with it in the event of an inevitable situation or exceptional circumstances such as a pandemic.	ISWG-STCW 1/2/30
Table A-VI/2-1	Chapters III and IV of SOLAS have been revised to include devices such as AIS EPIRB and AIS SART and may be incorporated the KUPs for the competence "Use locating devices, including communication and signalling apparatus and pyrotechnics". support	ISWG-STCW 1/2/40

Regulation VI/3
Section A-VI/3
Table A-VI/3

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation VI/3, paragraph 2	Revise to ensure clarity. (i.e. referring to generic certificates)	ISWG-STCW 1/2/16 Clarify that language regarding training "not included in the qualification for the certificate to be issued" refers to a Certificate of Competence
Section A-VI/3	There is no competence related to fire-fighting involving water-reactive materials.	ISWG-STCW 1/2/11
Section A-VI/3, paragraph 2	Refers to "the level of knowledge of the subjects listed in column 2 of table ...". Nevertheless, the items listed in column 2 of the tables refer not only to knowledge but also to understanding and proficiency, many of them referring to abilities to do something.	ISWG-STCW 1/2/11
Table A-VI/3	Add KUP for the competence 'Control fire-fighting operations aboard ships' after 'Fire fighting involving dangerous goods', it may be added 'Electric vehicles with lithium-ion batteries and batteries with similar risks'	ISWG-STCW 1/2/40

Regulation VI/4
Section A-VI/4
Table A-VI/4-1
Table A-VI/4-2

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation VI/4	<p>It has been observed that there is no direct reference to Medical Care competencies for Masters and Officers under Chapter II, leading to inconsistencies in the application of Medical Care training.</p> <p>Additionally, the KUPs associated with Medical Care may require a review to ensure they reflect current practices and needs onboard.</p>	ISWG-STCW 1/2/19
Regulation VI/4, paragraph 1 paragraph 2	<p>No requirement for seafarers designated to provide medical first aid or medical care on board ship to complete approved training, but only to demonstrate meeting the relevant standard of competence.</p> <p>This is not consistent with paragraph 3 of regulation VI/4, which refers to "training in medical first aid or medical care".</p> <p>There is also an inconsistency in the methods of demonstration competence listed in column 3 of tables A-VI/4-1 and A-VI/4-2, which refer to "practical instruction".</p>	ISWG-STCW 1/2/11
Regulation VI/4, paragraph 3	Revise to ensure clarity. (i.e. referring to generic certificates)	<p>ISWG-STCW 1/2/16</p> <p>Clarify that language regarding training "not included in the qualification for the certificate to be issued" refers to a Certificate of Competence</p>
Regulation VI/4	Inconsistency with the MLC (Guideline B4.1.1 – Provision of Medical Care), which recommends that "that seafarers responsible for medical care should undergo, at approximately five year intervals, refresher courses to enable them to maintain and increase their knowledge and skills and to keep up-to-date with new developments".	ISWG-STCW 1/2/11
Section A-VI/4 Section B-VI/4 Table A-VI/4-2	It is not consistent with the requirements of paragraph 3 of guideline B4.1 in the MLC 2006 Convention: "Persons referred to in paragraph 1 of this Guideline and such other seafarers as may be required by the competent authority should undergo, at approximately five year intervals,	ISWG-STCW 1/2/25

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	refresher courses to enable them to maintain and increase their knowledge and skills and to keep up-to-date with new developments".	
Section A-VI/4, paragraph 2 paragraph 5	Refer to "the level of knowledge of the subjects listed in column 2 of table ...". Nevertheless, the items listed in column 2 of the tables refer not only to knowledge but also to understanding and proficiency, many of them referring to abilities to do something	ISWG-STCW 1/2/11
Section B-VI/4	Addition of footnote referencing alternative medical guides used by Administrations, some of which address topical issues.	ISWG-STCW 1/2/19

Regulation VI/5
Section A-VI/5
Table A-VI/5

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation VI/5	The heading of this regulation refers to "mandatory minimum requirements for the issue of certificates of proficiency for ship security officers". However, only paragraph 2 includes the requirements for the issue of the corresponding certificate of proficiency while the requirements for certification as ship security officer are established in paragraph 1.	ISWG-STCW 1/2/11
Section A-VI/5	<p>The heading of this section "mandatory minimum requirements for the issue of certificates of proficiency certification for ship security officers" is not consistent with the requirements provided below since these are requirements for certification of having met the competences concerned and not for merely issuing the relevant certificate.</p> <p>Paragraph 2 refers to "the level of knowledge of the subjects listed in column 2 of table ...". Nevertheless, the items listed in column 2 of the tables refer not only to knowledge but also to understanding and proficiency, many of them referring to abilities to do something</p>	ISWG-STCW 1/2/11
Section A-VI/5	Due to the nature of geo-political relations and tensions as well as sophistication of methods and security breach causing devices, there might be a need to review the KUPs so that they are not only aligned with the ISPS Code but also deemed to be appropriate for current and possibly future times.	ISWG-STCW 1/2/19

Regulation VI/6
Section A-VI/6
Table A-VI/6-1
Table A-VI/6-2

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation VI/6	<p>Training leading to certification consists of three levels of training: security awareness training, training for seafarers with designated security duties and training for ship security officers, with the training for ship security officer being the highest level.</p> <p>The requirements were drafted so that the higher levels of training would include the competencies of the lower levels of training.</p> <p>Although the familiarization training or instruction in regulation VI/6, paragraph 1 addresses all seafarers, the obligation to be trained in security awareness should address only those seafarers who are not qualified as ship security officer or as seafarer with designated security duties.</p> <p>Because the training requirements in section A-VI/5 for ship security officer do not include any reference to the standards of competence in tables A-VI/6-1 (security awareness) and A-VI/6-2 (security designated duties), and the training requirements in section A-VI/6, paragraphs 6 to 8 for seafarers with designated security duties do not contain any reference to the standards of competence in table A-VI/6-1 (security awareness), it is recommended not to use wording such as "where training in [...] is not included in the qualification for the certificate to be issued" in provisions where the referred training is not specifically included in any other qualification under the Convention.</p>	ISWG-STCW 1/2/11
Regulation VI/6, paragraph 2 paragraph 5	Revise to ensure clarity. (i.e. referring to generic certificates)	<p>ISWG-STCW 1/2/16</p> <p>Clarify that language regarding training "not included in the qualification for the certificate to be issued" refers to a Certificate of Competence</p>

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Section A-VI/6	<p>The existing provision in paragraph 4 referring to ship security awareness training is applicable to "seafarers without designated security duties". Although holders of certificates of proficiency as "ship security officer" or "seafarer with designated security duties" can be considered qualified in security awareness, they might not be assigned to any security designated duties on board a specific ship or during a specific voyage.</p> <p>However, the existing text of paragraph 4 makes the security awareness training mandatory for seafarers already qualified as "ship security officers" or as "seafarers with designated security duties".</p>	ISWG-STCW 1/2/11
Section A-VI/6, paragraph 4.2.2 paragraph 7	<p>Refer to "the level of knowledge of the subjects listed in column 2 of table ...". Nevertheless, the items listed in column 2 of the tables refer not only to knowledge but also to understanding and proficiency, many of them referring to abilities to do something</p>	ISWG-STCW 1/2/11
Section A-VI/6-1 Section A-VI/6-2	<p>Due to the nature of geo-political relations and tensions as well as sophistication of methods and security breach causing devices, there might be a need to review the KUPs so that they are not only aligned with the ISPS Code but also deemed to be appropriate for current and possibly future times.</p>	ISWG-STCW 1/2/19
Section A-VI/6, paragraph 5 paragraph 9	<p>Propose to remove transitional provisions that ended 1 January 2014.</p>	ISWG-STCW 1/2/44
Section A-VI/6, paragraph 5 paragraph 9	<p>The 1 January 2014 date has passed.</p>	ISWG-STCW 1/2/16

APPENDIX 8

Chapter VII

**Regulation VII/1
Section A-VII/1**

**Regulation VII/2
Section A-VII/2**

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation VII/1 Section A-VII/1 Regulation VII/2 Section A-VII/2	Ensure that the crew on board is upskilled and that a more holistic view on the operation of a modern ship is facilitated allowing more flexibility for everybody's gain	ISWG-STCW 1/2/10
Regulation VII/1 Section A-VII/1 Regulation VII/2 Section A-VII/2	Chapter VII does not cover electro-technical officers and ratings in sections A-III/6 and A-III/7, nor does it provide reasons or supplementary provisions. The possibility of additional combinations of alternative certificates should be considered.	ISWG-STCW 1/2/25
Regulation VII/1 Section A-VII/1 Regulation VII/2 Section A-VII/2	Including a specialized certificate for small vessels such as commercial yachts, and the corresponding competencies and the minimum knowledge, understanding and proficiency (KUP) required for the certification	ISWG-STCW 1/2/10
Section A-VII/2, paragraph 1.2	The language is inconsistent with the language used to describe the training record book requirements in other places throughout the Convention and Code.	ISWG-STCW 1/2/16

**Regulation VII/1
Section A-VII/1**

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation VII/1	The text in paragraph 1 of regulation VII/1 refers to chapters II and III. However, the text in subparagraph 1.1 and in regulation VII/2, paragraph 1, refer to section A-IV/2 and chapter IV as well.	ISWG-STCW 1/2/11
Section A-VII/1	<p>Every candidate for certification at the operational level under the provisions of chapter VII of the annex to the Convention shall be required to complete relevant education and training and meet the standard of competence for all the functions prescribed in either table A-II/1 or table A-III/1.</p> <p>Functions specified in table A-II/1 or A-III/1 respectively may be added provided the candidate completes, as appropriate, additional relevant education and training and meets the standards of competence prescribed in those tables for the functions concerned.</p> <p>Table A-II/1 or A-III/1 specified for 2nd time may be deleted.</p>	ISWG-STCW 1/2/41

**Regulation VII/2
Section A-VII/2**

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Section A-VII/2	<p>The text in section A-VII/2, paragraph 2.2 does not include reference to table A-II/2 next to the reference to A-II/1.</p> <p>In addition, a candidate for qualification as person having "command or the responsibility for the mechanical propulsion of the ship" may perform the seagoing service not only at operational level but also at management level as "person other than having command or responsibility for the mechanical propulsion of the ship".</p> <p>Therefore, the duties performed during the seagoing service should relate to functions set out in the tables of competence at operational and management level for both deck and engine departments.</p> <p>Furthermore, reference to the requirements of regulation VII/1, paragraph 1.3 is not included in the existing text in regulation A-VII/2, paragraph 2, to keep consistency.</p>	ISWG-STCW 1/2/11

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	<p>Paragraph 2 currently appears to be leading to interpretation issues and may be further clarified.</p> <p>Consider inclusion of table(s)/flowchart(s) in part B to the Code.</p> <p>Provision of flexibility in acquisitions/ additions of functions may be considered under chapter VII.</p>	ISWG-STCW 1/2/41

APPENDIX 9

Chapter VIII

Regulation VIII/1 Section A-VIII/1

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation VIII/1 Section A-VIII/1.10	Refers to drug and alcohol abuse. Section A-VIII/1, paragraph 10 refers to standard for preventing alcohol abuse only. However, there is no minimum standard for drug abuse or definition of what constitutes drug abuse.	ISWG-STCW 1/2/10
Regulation VIII/1 Section A-VIII/1	The provisions of resting hours are duplicated in the MLC, 2006 and there is a different ratification status of the MLC, 2006 and the STCW Convention.	ISWG-STCW 1/2/10
Regulation VIII/1 Section A-VIII/1	Include means of establishing the Blood Alcohol Content (BAC) and ensure it is aligned/clarified with the MLC, 2006 and ISM Code	ISWG-STCW 1/2/10
Section A-VIII/1, paragraph 2 paragraph 3	Align the wording of the section A-VIII/1, paragraphs 2 and 3 with the text of MLC Standard A.2.3.5 (Rest Periods)	ISWG-STCW 1/2/27 Annex 2
Section A -VIII/1	Section A -VIII/1 – Recommendations in respect of fatigue in part B, in particular for the vessels on short voyages, may be included in part A	ISWG/STCW 1/2/42

Regulation VIII/2 Section A-VIII/2

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation VIII/2 Section A-VIII/1 B-VIII/2.	The terms "stand by" or "on call" in regulation VIII/2, sections A-VIII/1 and B-VIII/2 are subject to different interpretations, and there is no quantified standard for the interruption to normal rest time or for adequate compensative rest in the case of stand-by.	ISWG-STCW 1/2/25
Section A-VIII/2	In 2023, IMO issued the Interim Guidelines on safe operation of onshore power supply (OPS) service in port for ships engaged on international voyages (MSC.1/Circ.1675). With the increasing use of OPS, it is suggested to add precautions for the use of OPS in part 5, section AVIII/2, such as: when using OPS, ships should pay attention to the fixation of shore power cables, especially when the tide changes or at berths with large tide ranges, and measures should be taken to ensure that the OPS is in normal working condition.	ISWG-STCW 1/2/25
Section A-VIII/2 Section B-VIII/2	Revision and development of new competences is needed to address advances in technology, modern terminology, taxonomy, and lessons	ISWG/STCW 1/2/16

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	learned. (e.g. modern navigational tools, weather routing, integrated systems, etc.)	Revise and update these sections to align with other instruments and guidelines, and to address advances in technology, modern terminology, taxonomy and lessons learned.
Section A-VIII/2.5 and 2.6 (part 2)	Ensure that different types of ECDIS are taken into consideration.	ISWG-STCW 1/2/10
Section A-VIII/2.8.5	Watchkeeping personnel shall also understand the limitations of the equipment. It applies to current and possible new technology.	ISWG-STCW 1/2/10 Revise the provision to include familiarization of the limitations of current or future equipment
Section A-VIII/2, part 4-1	Include a definition of lookout, helmsperson and small ships, taking into account the technological development and the Principles of minimum safe manning (resolution A.1047(27)).	ISWG-STCW 1/2/10
Section A-VIII/2, part 4-1	Under the subtitle of "Lookout" there are four paragraphs (paragraphs 14 through 17) and 19 sub-paragraphs that specify the purpose, personnel, duty arrangements and factors to be considered for maintaining a proper lookout. As an integral and indispensable part of a proper lookout, lookout information processing, though invisible and intangible, is equally important. Incidents have shown that seafarers' flawed lookout information processing skills is a weak link in the safety chain for ensuring maritime safety. However, the above-mentioned paragraphs of the Convention contain only general requirements for lookout information collecting and processing, without specific standards and guidance for seafarers.	ISWG-STCW 1/2/25
Section A-VIII/2	<p>1. The lack of requirements for ship security in part 4 of section A-VIII/2 "Principles applying to watchkeeping generally" is not consistent with paragraph 2.5 under regulation VIII/2</p> <p>2. In paragraph 34 of part 4-1 under section A-VIII/2, "Principles to be observed in keeping a navigational watch", there is an ambiguity in the understanding of error determination for standard compass, which easily leads to inconsistency in practice; in paragraph 51 "If the master considers</p>	<p>ISWG-STCW 1/2/25</p> <p>1. Add a new paragraph on ship security after paragraph 12 of part 4, section A-VIII/2</p> <p>2. Revise or add an exemption to the</p>

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	it necessary, a continuous navigational watch shall be maintained at anchor." the meaning of the word "necessary" is unclear.	frequency of compass determination 3. Provide a non-exhaustive list of conditions for when "necessary" applies, such as strong wind and waves, or sea areas with a heavy traffic of ships.
Section VIII/2, paragraphs 16 and 17	The hours of daylight vary geographically and seasonally, this should be added as an additional relevant factor	ISWG-STCW 1/2/11
Section A-VIII/2, part 1, paragraphs 1 and 2	The Code, at present, stipulates only the following: 1 The officer in charge of the navigational or deck watch shall be duly qualified in accordance with the provisions of chapter II or chapter VII appropriate to the duties related to navigational or deck watch keeping. 2 The officer in charge of the engineering watch shall be duly qualified in accordance with the provisions of chapter III or chapter VII appropriate to the duties related to engineering watch keeping. 'Chapters IV and relevant sections of chapter V' may be added after chapter VII in sub para. 1 'Relevant sections of chapter V' may be added after chapter VII in sub paragraph 2, section A-VIII/2, part 1, paragraphs 1 and 2 – Certification	ISWG/STCW 1/2/42
Section A-VIII/2, part 2, paragraphs 3 and 4 - Voyage Planning – General requirements	The Code, at present, stipulates only the following: 3 The intended voyage shall be planned in advance, taking into consideration all pertinent information, and any course laid down shall be checked before the voyage commences. 4 The chief engineer officer shall, in consultation with the master, determine in advance the needs of the intended voyage, taking into consideration the requirements for fuel, water, lubricants, chemicals, expendable and other spare parts, tools, supplies and any other requirements It is proposed that food supplies and medical facilities may also be added. Also, any specific protection or safety equipment, if specified in any of the other IMO instruments such as IMSBC, IBC, IGC Codes, etc., for cargo being carried on that voyage may also be included.	ISWG/STCW 1/2/42
Section A-VIII/2, part 2, paragraphs 5 and 6	Paragraph 5 reads as follows: "Prior to each voyage, the master of every ship shall ensure that the intended route from the port of departure to the first port of call is planned using adequate and	ISWG/STCW 1/2/42

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	appropriate charts and other nautical publications necessary for the intended voyage, containing accurate, complete and up-to-date information regarding those navigational limitations and hazards which are of a permanent or predictable nature and which are relevant to the safe navigation of the ship" (a) Paragraph 5 may be amended to readfrom 'berth in departure port' to 'berth in the first port of call'..... Also to include environmental and weather considerations. (b) Paragraph 5 may also be amended to include 'ENCs' Paragraph 6 reads as follows: When the route planning is verified, taking into consideration all pertinent information, the planned route shall be clearly displayed on appropriate charts and shall be continuously available to the officer in charge of the watch, who shall verify each course to be followed prior to using it during the voyage (b) Paragraph 6 may also be amended to include 'ENCs'	
Sections A-VIII/2.22.5.2 and 34.2 (part 4-1)	Refer only to gyro- and magnetic compasses. Include more types of compasses.	ISWG-STCW 1/2/10
Section A-VIII/2.34	"the standard compass error is determined at least once a watch" while in 34.3 "the automatic pilot is tested manually at least once a watch.". This might be an unnecessary requirement when length of watch varies e.g. from 30 minutes to 12 hours.	ISWG-STCW 1/2/10 Ensure that the provisions take into consideration and are compatible with different lengths of watch
Section A-VIII/2.36	Section A-VIII/2.36 (part 4-1) could highlight other devices that could be beneficial, apart from the echo-sounder, or to remove all-together this mention.	ISWG-STCW 1/2/10 Include more devices or delete any reference to echo-devices
Section A-VIII/2, part 3, paragraph 8.9 - Watchkeeping Principles in General	Paragraph 8.6 reads as follows: "Watches shall be carried out based on the following bridge and engine-room resource management principles: .6 watchkeeping personnel shall understand information and how to respond to information from each station/installation/equipment"; It is proposed To add at the end in the line – 'and be aware of the limitations of such station/installation/equipment, including the fact that such station/installation/equipment may be prone to cyber attack'	ISWG/STCW 1/2/42

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Section A-VIII/2, part 4-1, paragraph 16	Section A -VIII/2, part 4-1, paragraph 16 stipulates the conditions for sole look out. It is stated that "The officer in charge of the navigational watch may be the sole lookout in daylight provided that, on each such occasion:...." It may be considered to include functional BNWAS also as one of the conditions	ISWG/STCW 1/2/42
Section A-VIII/2, part 4-2, paragraph 53	Section A -VIII/2, part 4-2, paragraph 53 stipulates "The officer in charge of the engineering watch is the chief engineer officer's representative and is primarily responsible, at all times, for the safe and efficient operation and upkeep of machinery affecting the safety of the ship and is responsible for the inspection, operation and testing, as required, of all machinery and equipment under the responsibility of the engineering watch." It is proposed that the text may be replaced by the following: The officer in charge of the engineering watch is the chief engineer officer's representative and is responsible at all times for the safe and efficient operation of all machinery, under the responsibility of the engineering watch and specifically of machinery affecting the safety of the ship. The logic behind the proposal is that an engineer, in particular a junior engineer may only work on the machinery that is assigned to him/her and does not, suo moto, starts maintenance on machinery that may be beyond his/ her capacity/ brief.	ISWG/STCW 1/2/42
Section A-VIII/2, part 4-2, paragraph 58.4	Section A-VIII/2, part 4-2, paragraph 58.4 stipulates "Prior to taking over the engineering watch, relieving officers shall satisfy themselves regarding at least the following. .4 the condition and level of fuel in the reserve tanks, settling tank, day tank and other fuel storage facilities;" It is proposed to add "ME Lub Oil Sump"	ISWG/STCW 1/2/42
Section B-VIII/2, parts 2, 3 and 4	There are no provisions covering ECDIS in part B of the STCW Code. ECDIS differs significantly from paper charts when it comes to planning and executing a voyage.	ISWG-STCW 1/2/10
Section B-VIII/2, part 4.3 (radio watch)	Update the provisions on GMDSS taking into consideration CP, ITU Radio Regulations	ISWG-STCW 1/2/10

APPENDIX 10

VIOLENCE AND HARASSMENT, INCLUDING SEXUAL HARASSMENT, BULLYING AND SEXUAL ASSAULT

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/14	Lacks provision for the responsibility of companies to ensure a maritime workplace safe from violence and harassment. Addition of companies' responsibilities under regulation I/14 to include establishing and implementing policies on zero tolerance for violence and harassment, including sexual harassment, bullying and sexual assault, protection against non-retaliation or blacklisting of victim-seafarers, and a grievance mechanism that ensures safe zones for victims, enabling them to file complaints without fear	ISWG-STCW 1/2/22
Regulation I/14	There are no provisions to require company policies and procedures for prevention of and response to violence and harassment, including sexual harassment, bullying and sexual assault.	ISWG-STCW 1/2/16
Section A-I/14 Section A-I/16	A-I/14 "Responsibilities of companies" may include a more specific provision on the matter of violence and harassment, including sexual harassment, bullying and sexual assault. Section A-I/16 of the STCW Code should reflect "prevention of violence and harassment, including sexual harassment, bullying and sexual assault" in the area of "fitness for duty and watchkeeping arrangements" pending until after IMSAS related decision has been made	ISWG-STCW 1/2/10
Table A-II/1, A-II/2, A-II/3, A-III/1, A-III/2, A-III/3, A-III/6	There are no competence requirements for operational or Management level prevention of and response to violence and harassment, including sexual harassment, bullying and sexual assault.	ISWG-STCW 1/2/16 Develop competences to address the prevention of and response to violence and harassment, including sexual harassment, bullying and sexual assault.
Part B, chapter II	Include a nominated contact ashore, who is independent of the company providing the training at sea, with whom the prospective officer can make contact at any time during the normal working day of the student's Flag Administration in order to raise significant concerns regarding their onboard training, health and safety, including concerns regarding violence and harassment, including sexual harassment, bullying and sexual assault.	ISWG-STCW 1/2/27, annex 4

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Table A-II/2	Table A-II/2 should be revised to emphasize the understanding of Human Element and how to lead for safety, compliance with SASH requirements, psychological safety, and the factors that enhance and impact seafarers' well-being and mental health.	ISWG-STCW 1/2/46
Tables A-II/1, A-II/2, A-III/1, A-III/2 and A-III/6	The role of management, particularly in preventing and addressing incidents of harassment and bullying, is critical and goes beyond the scope of basic safety training. Therefore, there is a clear need for an additional, specialized training program to address these gaps.	ISWG-STCW 1/2/30
Chapters II and III	Ensuring that the provisions include training to prevent violence and harassment, including sexual harassment, bullying and sexual assault, in the training for any new CoC and CoP as well as for the revalidation of certificates issued under existing provisions.	ISWG-STCW 1/2/10
Table A-II/2 Table A-III/2	Lack competence in maintaining occupational health protection of seafarers on board ship. Addition of competence under tables A-II/2 and A-III/2 under the function "Controlling the operation of the ship and care for persons onboard at the management level" to include maintaining occupational health protection of seafarers onboard ship;	ISWG-STCW 1/2/22
Tables A-II/1, A-II/2, A-II/3, A-II/4, A-II/5, A-III/1, A-III/2, A-III/3, A-III/4, A-III/5, A-III/6 and A-III/7	Consideration could be given to incorporating awareness and prevention training for violence and harassment within chapters II and III i.e. in particular, the function "Controlling the operation of the ship and care for persons on board at the operational/management level" for seafarers achieving or revalidating their Certificate of Competency. For all seafarers (chapters 2 and 3)	ISWG-STCW 1/2/19
Section A-VI/1, paragraph 3	There is currently no requirements for all seafarers to maintain the standard of competence for contributing to the prevention of and response to violence and harassment, including sexual harassment, bullying and sexual assault in Table A-VI/1-4 every five years.	ISWG-STCW 1/2/16 Revise section A-VI/1 to include a requirement to maintain the standard of competence, every 5 years, in Table A-VI/1-4 for prevention of and response to violence and harassment, including sexual harassment, bullying and sexual assault.

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Tables A-VI/4-1 and A-VI/4-2	There are no competence requirements for response to violence and harassment, including sexual harassment, bullying and sexual assault, mental health, or women's health emergencies.	ISWG-STCW 1/2/16 Develop competences in tables A-VI/4-1 and A-VI/4-2 to address response to violence and harassment, including sexual harassment, bullying and sexual assault, mental health, and women's health emergencies.

APPENDIX 11

MENTAL HEALTH, PSYCHOLOGICAL SAFETY AND GENDER AND CULTURAL DIVERSITY

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/5	Lacks provision for the responsibility of each Party in promoting a psychologically safe maritime work environment. Addition of a provision under regulation I/5 about the responsibilities of each Party in promoting a psychologically safe maritime work environment	ISWG-STCW 1/2/22
Chapters II and III, part A Table A-VI/1-4	Proposed that a new competence be added to tables A-II/1 and 2 and A-III/ 1 and 2 titled: Gender and Cultural Sensitivity	ISWG-STCW 1/2/13
Table A-II/2 Table A-II/3 Table A-III/2 Table A-III/3 Table A-VI/1-4 Table A-VI/1-3	At a management level, the inclusion of educational requirements to enable comprehensive mental health management of subordinate seafarers through recognition, assessment, and onboard responding and supporting techniques using leadership and managerial skills.	ISWG-STCW 1/2/30
Table A-VI/1-3, Table A-VI/1-4	There are no competence requirements for mental health awareness.	ISWG-STCW 1/2/16 Develop competences in tables A-VI/1-3 and A-VI/1-4 to address mental health.
Table A-VI/1-3 (EFA):	'Signs/ symptoms arising due to mental health and emotional and psychological issues of self and fellow seafarers on board' may be added to column 2, sub-paragraph 2	ISWG-STCW 1/2/40
Section A-VI/1-4	Table A-VI/1-4 Under the requirements for safety familiarization, basic training, and instruction for all seafarers, the inclusion of education requirements that equip seafarers with the skills to recognize and manage their own mental health.	ISWG-STCW 1/2/30
Table A-VI/1-4	Lack of mental health requirements for seafarers in the standard of competence in personal safety and social responsibilities.	ISWG-STCW 1/2/25
Table A-VI/1-4	In column 2, row 5 - under the competency 'Contribute to effective human relationships on board ship', at the end of the line 'Importance of maintaining good human and working relationships aboard ship' it may be added 'Due regards be given to gender and cultural diversity that may prevail on the ship'.	ISWG-STCW 1/2/40
Table A-VI/1-4 (PSSR)	'Understand and take necessary actions to maintain mental health and emotional and psychological wellbeing' may be added as a new competency in column 1 as row 7.	ISWG-STCW 1/2/40

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Table A-VI/1-4	'Introduction to practices, such as Yoga, to promote mental and physical health and emotional and psychological wellbeing' may be added as column 2, to the aforesaid proposed new competency.	ISWG-STCW 1/2/40
Section A-VIII/2, part 3, paragraph 8.2 and part 4-1, paragraph 17.5	Paragraph 8.2 reads as follows: "Watches shall be carried out based on the following bridge and engine-room resource management principles: .2 any limitation in qualifications or fitness of individuals shall be taken into account when deploying watchkeeping personnel;" Paragraph 17.5 reads as follows: "In determining that the composition of the navigational watch is adequate Following factors5 the fitness for duty of any crew members on call who are assigned as members of the watch" (a) Paragraph 8.2 and 17.5 may be amended to include after fitness, 'including mental health and emotional and psychological wellbeing' to be revisited under chapter VIII	ISWG/STCW 1/2/42
Section A-VIII/2, part 4-1, paragraph 17	It may be considered to add following factors to those listed in paragraph 17, i.e. the factors to be considered "In determining the composition of the navigational watch.... Following factors5 the fitness for duty of any crew members on call who are assigned as members of the watch" (a) Paragraphs 8.2 and 17.5 may be amended to include after fitness, 'including mental and emotional wellbeing'	ISWG/STCW 1/2/42

APPENDIX 12

BALLAST WATER MANAGEMENT

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Tables A-II/1, A-II/2, A-II/3, A-III/1, A-III/2, A-III/3, and A-III/6	In order to facilitate the implementation of the BWM Convention, amendments to the minimum standard of competence for officer, engineer officer, and rating in the STCW Code A are required.	ISWG-STCW 1/2/30
Tables A-II/1, A-II/2, A-II/3, A-III/1, A-III/2, A-III/3, and A-III/6	The standards of competence detailed in the above-mentioned tables should include new competencies and KUPs related to ballast water management as detailed in HTW 7/12 (China and ICS).	ISWG-STCW 1/2/19 HTW 7/12
Table A-III/1	Function: Marine engineering at the operational level Column 1 (Competence) - Operate fuel, lubrication, ballast and other pumping systems and associated control systems Column 2 (KUP) - Proposed to add after Oily-water separators (or similar equipment) requirements and operation, "Ballast water treatment systems requirement and operation" Inclusion of BWTS in KUP Column	ISWG-STCW 1/2/37
Table A-II/1, A-II/2, A-II/3, A-III/1, A-III/2, A-III/3	There are no competence requirements for operational or management level compliance with the Ballast Water Management Convention and BWMS Code.	ISWG-STCW 1/2/16 Develop competences to address the implementation of the Ballast Water Management Convention.

APPENDIX 13
CYBER SECURITY

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Chapter II, III, IV and VI	With the development of new technologies, cyber security has an increasing significant impact on the safe operation of ships. The existing provisions of the STCW Convention only have partial and incomplete requirements on the knowledge and skills of computer network and cyber security for electro-technical officers at the operational level. Therefore, it is necessary to enhance the requirements for cyber security knowledge and skills for other deck officers and engineer officers.	ISWG-STCW 1/2/25
Chapter II, III, IV and VI	It is proposed that provisions be developed to incorporate cyber security training requirements for seafarers in the above sections. Reference could be drawn from resources such as the Guidelines on maritime cyber risk management (MSC-FAL.1/Circ.3/Rev.2).	ISWG-STCW 1/2/26
Chapter II, III, IV and VI	With the advent of advanced digital technology in newly built ships and the increasing number of IT and OT (Operational Technology) devices in their operational equipment, the incidence of cyber security incidents on ships is on the rise. The scale of these incidents has a significant impact on both the safety and economic aspects of maritime industry. New competence and KUPs in Tables A-II/1, A-II/2, and A-II/3. New competence and KUPs in Tables A-III/1, A-III/2, and A-III/6. New paragraph in section A-VI including competence and KUPs of STCW Code	ISWG-STCW 1/2/30
Chapter II, III, IV and VI	Cybersecurity is commonly addressed within the Safety Management System of many companies, however there is a need to specify the minimum standards of competency in this area along with the development of associated KUPs. Evaluate the most effective placement of cybersecurity training within the relevant chapters to ensure comprehensive coverage. i.e. within the tables of chapters II, III and IV and/or chapter VI.	ISWG-STCW 1/2/19
Chapter II, III, IV and VI	Table A-II/1 should be revised to cover cyber security considerations, best practices and the Human Element, including Data Science skills. Table A-II/2 should be revised to cover cybersecurity considerations, best practices and the Human Element, including Data Science skills.	ISWG-STCW 1/2/46

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	Table A-III/2 should be revised to include cyber security considerations, best practices, the Human Element and Data Science skills	
Chapter II, III, IV and VI	Inclusion of awareness of cybersecurity measures may be considered in table A-VI/5 and A-VI/6 depending upon the level of competence	ISWG-STCW 1/2/40
Chapter II, III, IV and VI	Ensure that the provision addresses cyber security awareness and consider including transitional provisions for the already certified seafarers	ISWG-STCW 1/2/10
Chapter II, III, IV and VI	There are no competence requirements for Maritime Cyber Security.	ISWG-STCW 1/2/16 Develop competences in tables A-VI/5, A-VI/6-1 and A-VI/6-2 to address maritime cyber security.

ANNEX 2*

PROPOSALS FOR GAPS IN RELATION TO COMMUNICATION OF INFORMATION AND QUALITY STANDARDS SYSTEM REQUIRED BY THE STCW CONVENTION AND CODE

Provisions where a gap is identified		Document No.
Article/Regulation	Section	
I/7	A-I/7, B-I/7	ISWG-STCW 1/2/8
		ISWG-STCW 1/2/16, annex 1
		ISWG-STCW 1/2/25, annex 4, item 1
		ISWG-STCW 1/2/44 annex item 2,3
		HTW 9/7/10, annex, paragraph 14
I/8	A-I/8, B-I/8	ISWG-STCW 1/2/7
		ISWG-STCW 1/2/11, annex 3, item 3
		ISWG-STCW 1/2/16, annex 1
		ISWG-STCW 1/2/25, annex 3, item 4
		HTW 9/7/10 annex paragraph 10
		HTW 7/10/2 paragraph 7
I/16	A-I/16, B-I/16	ISWG-STCW 1/2/5
		ISWG-STCW 1/2/28

* Annex in English only.

ANNEX 3*

PROPOSALS FOR GAPS IDENTIFIED IN RELATION TO MASS

Provisions where a gap is identified		Document No.
Article/Regulation	Section	
Article III		ISWG-STCW 1/2/25, annex 1
Article III		ISWG-STCW 1/2/46, annex 1
Chapter VII	A-II/1, A-II/2, A-III/1, A-III/2, A-VIII/1 and A-VIII/2 and chapter VII	ISWG-STCW 1/2/30, annex 1
II/1, II/2, II/3, III/1, III/2, III/3 and VIII/2	A-II/1, A-II/2, A-II/3, A-III/1, A-III/2, A-III/3 and A-VIII/2	ISWG-STCW 1/2/43, annex 1
II/1, II/2, II/3, II/4, III/1, III/2, III/3, III/4, III/6, III/7 and chapter V	A-II/1, A-II/2, A-II/3, A-II/4, A-III/1, A-III/2, A-III/3, A-III/4, A-III/6, A-III/7 and chapter V	ISWG-STCW 1/2/10, annex 1, item 10
	A-III/6	ISWG-STCW 1/2/25, annex 3, item 9
	Part B, chapter V	ISWG-STCW 1/2/25, annex 4, item 5
VII/1, VII/2 and VII/3	A-VII/1, A-VII/2, B-VII/1, B-VII/2 and B-VII/3	ISWG-STCW 1/2/19, annex 2, item 5
VIII/1.1		ISWG-STCW 1/2/10, annex 1, item 16
VIII/2	A-VIII/2 and B-VIII/2	ISWG-STCW 1/2/19, annex 2, item 6
VIII/2.2.1 and 2.2.3	A-VIII/1.4, A-VIII/1.9 and A-VIII/2	ISWG-STCW 1/2/10, annex 1, item 17
	A-VIII/2.8.5	ISWG-STCW 1/2/10, annex 2, item 8
	A-VIII/2, part 4-1	ISWG-STCW 1/2/10, annex 2, item 9
	A-VIII/2, part 4-1	ISWG-STCW 1/2/10, annex 2, item 10
	A-VIII/2.22	ISWG-STCW 1/2/10, annex 2, item 11
	A-VIII/2, part 4-2	ISWG-STCW 1/2/10, annex 2, item 15
	A-VIII/2, part 4-3	ISWG-STCW 1/2/10, annex 2, item 16
	A-VIII/2, part 5	ISWG-STCW 1/2/10, annex 2, item 17
	B-VIII/1.1	ISWG-STCW 1/2/10, annex 3, item 2

* Annex in English only.

ANNEX 4*

PROPOSALS FOR GAPS IDENTIFIED IN RELATION TO THE REDUCTION OF GHG EMISSIONS FROM SHIPS USING NEW TECHNOLOGIES AND ALTERNATIVE FUELS

Provisions where a gap is identified		Document No.
Article/Regulation	Section	
	A-II/1, A-II/2, A-II/3, A-III/1, A-III/2, A-III/3 and A-III/6	ISWG-STCW 1/2/19, annex 3, item 8
	Chapters II and III	ISWG-STCW 1/2/25, annex 3, item 18
	A-II/2	ISWG-STCW 1/2/46, annex 3, item 16
	A-III/6	ISWG-STCW 1/2/37, annex, item 2
	A-III/6	ISWG-STCW 1/2/46, annex 3, item 33
V/3		ISWG-STCW 1/2/39, annex, item 3
V/1-2 and V/3		ISWG-STCW 1/2/25, annex 2, item 8
	Chapter V	ISWG-STCW 1/2/25, annex 3, item 10
	A-V/1-1, A-V/1-2 and A-V/3	ISWG-STCW 1/2/33
V/3		ISWG-STCW 1/2/27, annex 3
V/3		ISWG-STCW 1/2/43, annex 3
Chapter V	Chapter V	ISWG-STCW 1/2/43, annex 4
	Part B, chapter V	ISWG-STCW 1/2/27, annex 1
	A-VI/3	ISWG-STCW 1/2/40, annex, item 5

* Annex in English only.