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WORK PROGRAMME

Proposal for a new output on the development of provisions on quality of onboard training of prospective officers

Submitted by the Philippines and IAMU

	SUMMARY
Executive summary:	This document proposes the inclusion of a new output in the biennial agenda of the HTW Sub-Committee in order to ensure the quality of Onboard Training of prospective officers for the attainment of Certificates of Competency
Strategic direction, if applicable:	1
Output:	Not applicable
Action to be taken:	Paragraph 22
Related documents:	STW 39/INF.2; MSC 85/23/6; STW 40/13/1; STW 41/7/11, STW 41/7/11; HTW 2/INF.2; HTW 4/INF.4; HTW 5/INF.5; MSC 100/10/4, MSC 100/10/4 and the ISM Code

Introduction

1   This proposal is submitted in accordance with the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.1), taking into account the *Application of the Strategic Plan of the Organization* (resolution A.1111 (30)).

2   The quality of prospective officers is predominantly dependent upon the quality of Onboard Training (OBT) they received. OBT is the only opportunity to strategically align the theoretical knowledge acquired in a maritime institution with practical day-to-day shipboard operations. When accomplished without any compromise on quality, OBT has the potential to not instil the underpinning skills and knowledge needed to transform trainees into effective manpower.

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3   Taking into consideration the experience of Maritime Education and Training (MET) institutions in the assessment of results achieved by students/cadets during their OBT and also referring to outcomes of prospective officers' feedback submitted in document HTW 4/INF.4, IAMU has prepared a desk study of instruments (HTW 5/INF.5), which, in IAMU's vision, might be the subject of regulations and assessment of this type of OBT. The study outlines possible inconsistencies in interpretation and follow-up implementation of documents relating to control of OBT by Administrations and the industry.

Background

4   The Assembly, at its thirtieth session, adopted the Strategic Plan (SP) for the Organization for the six-year period 2018 to 2023. The SP identifies the strategic directions (SDs) on which IMO will focus in the period from 2018 to 2023, and they are set out in resolution A.1110 (30). The SDs provide the list of outputs that are planned to be delivered by the Organization including an output on "Monitoring of Integrated Technical Cooperation Programme (ITCP) implemented on the enhancement of maritime training capacities, including middle and senior management levels" (1.6) under SD 1 "Improve implementation".

5   MSC at its ninety-eighth session (MSC 98/23) agreed on the thematic priorities for the 2018-2019 biennium as reflected in the annex to document MSC 98/22, identifying "Seafarers training and human element" as a first priority for inclusion in the ITCP covering the 2018-2019 biennium.

6   The 1978 STCW Convention, as amended (hereinafter STCW '78) contains mandatory provisions and recommended guidance regarding OBT for Certificates of Competency (CoC) to be issued to prospective officers. However, according to the co-sponsors' understanding there are some OBT issues that are to be considered and shared in the maritime community in more detail.

IMO's objectives

7   This proposal is directly related to strategic direction 1 of the *Strategic Plan for the Organization for the six-year period 2018 to 2023* (resolution A.1110(30)), in particular paragraphs 14 and 15 thereof, emphasizing that the crucial role played by IMO in creating a level playing field for its Members can only be achieved through effective and uniform implementation of IMO instruments, their enforcement by the States Parties to them, and full compliance by the States concerned and the shipping industry.

Need

8   The building of newer and more technically sophisticated ships to meet the increased demand for seaborne trade, along with new IMO requirements for regulating safety, security and protection of the environment, will demand, more than ever, well-trained and educated personnel both on board and ashore. Viewed in this light, it is easy to see why sustainable development needs a sustainable maritime transportation system and why sustainable shipping needs a sustainable and quality manpower supply based on standards of STCW 78, as amended.

Analysis of the issue

9   Taking into account that STCW 78 contains the entire generic regulatory framework for setting in place the national mechanisms for OBT and for assisting relevant parties in improving the efficiency of these mechanisms, the supporting approaches below for ensuring

the quality of OBT of prospective officers for issuing them with the CoC, are proposed by the co-sponsors.

10   In accordance with STCW 78 requirements, the OBT time frames for issuing the CoC is about 25% of a total Maritime Education and Training (MET) and plays a unique and decisive role in achieving qualification standards for future maritime professionals. IAMU has conducted a post-OBT anonymous feedback survey of prospective officers' views after their recent OBT in order to obtain first-hand information on the quality of training, provided for prospective officers by different shipping companies around the world (HTW4/INF.4). This feedback information motivated IAMU for further activity in this field aimed to improve the quality of OBT.

11   However, the following approaches based on effective IMO instruments could be developed to provide assistance to Administrations to ensure the quality of OBT of prospective officers prior to issuing them with their first CoC:

.1   **Approach 1.** It can be done through analysis of STCW 78 by developing appropriate wording (amendments, unified interpretations) in the context of OBT for the provisions of the article II (Definitions), regulations I/1 (Definitions and clarifications), I/6, I/7, I/8, I/10, I/14, I/16, II/1, III/1 and III/6; and

.2   **Approach 2.** Including the OBT for prospective officers in the Safety Management System as per the ISM Code. The principles and objectives of the ISM Code provide an international standard for the safe management and operation of ships and for pollution prevention. The success of its implementation depends, to a great extent, on the continued commitment, competence, attitudes and motivation of prospective officers, at all levels, in the company and on board ships to which the ISM Code applies.

Analysis of implications

12   The output of the review would imply supporting the STCW 78 instrument in order to identify the need for any changes to improve the quality of OBT for prospective officers. It does not intend to limit or change anyhow the current system and requirements, but rather to support a legal framework for implementation of STCW 78 regulations II/1, III/1 and III/6 by Parties to STCW 78. Therefore, the output will have no financial or administrative implications and no additional legislative or administrative burdens expected. A complete checklist for identifying administrative requirements and burdens is set out in annex 1.

Benefits

13   While maintaining the current arrangements and system of prospective officers' OBT and certification requirements as provided in the STCW 78, the proposed output would support a legal framework for the Administrations towards a more effective implementation of STCW 78 requirements related to OBT for prospective officers. That would entail additional benefits related to the STCW 78 control procedures to improve the quality of OBT.

14   The proposal would also encourage Parties to STCW 78 to draw more attention to such a unique OBT, as OBT for the young and next generation of seafarers.

Industry standards

15   The proposed output refers to the seafarers' training and certification process pursuant to the STCW 78 and ISM Code, which belongs to the Administration's responsibility

under these IMO instruments, so there are no other industry provisions or standards applicable to the proposed output other than the relevant provisions in STCW 78 and the ISM Code.

Output

16   The proposed output on "Adoption of measures to ensure quality of Onboard Training as part of the mandatory seagoing service required in the STCW Convention" should be considered by the HTW Sub-Committee, at its next session, with a view to developing the analysis of the approaches proposed for submission to the Committee for approval.

17   The co-sponsors suggest that the proposed draft approaches, as set out in annex 3, be used as a base idea for further discussion/improvement, with the objective of achieving the intent of the proposal.

18   The proposed output in SMART terms (specific, measurable, achievable, realistic, time-bound) is as follows:

> .1   **Specific** – the output implies the analysis of the current provisions supporting the STCW 78 in order to ensure the need to improve the quality of OBT for prospective officers (cadets/students);
>
> .2   **Measurable** – the output includes specific measurable results, which can include the number of prospective officers successfully completing OBT annually (or in 5 years);
>
> .3   **Achievable and realistic** – the approaches proposed have already been implemented in the shipping industry and MET field as a result of the QMS (QSS) and SMS mechanisms application. Therefore, the measures that will be introduced by the proposed approaches have in effect already been demonstrated to be achievable and realistic by the shipping industry; and
>
> .4   **Time-bound** – due to the urgency and the relatively manageable amount of work to be carried out, the completion of the output is envisaged to take one session of the HTW Sub-Committee.

Human element

19   The completed checklist for considering human element issues by IMO bodies (MSC-MEPC.7/Circ.1) is set out in annex 2. The proposal is not considered to have negative implications for the human element, on the contrary, if implemented, the improved OBT system will substantially raise the quality of prospective officers that will in turn raise the efficiency of industry, safety and protection of the environment.

Urgency/priority

20   It is considered that further consideration of this issue should be addressed as a matter of priority and as soon as practicable. In this regard, the proposed output should be included in the Strategic Plan of the Organization and priorities for the 2020 to 2021 biennium.

21   As such, it is proposed that the new relevant output be added to the current biennial agenda of the Committee and the provisional agenda for HTW 7 in 2020, with one session needed to complete the work.

Action requested of the Committee

22   The Committee is invited to include a new output on "Adoption of measures to ensure quality of onboard training as part of the mandatory seagoing service required in the STCW Convention" in its biennial agenda.

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ANNEX 1

CHECKLIST FOR IDENTIFYING ADMINISTRATIVE REQUIREMENTS

This checklist should be used when preparing the analysis of implications required in submissions of proposals for inclusion of outputs. For the purpose of this analysis, the term "administrative requirements" is defined in resolution A.1043(27), i.e. administrative requirements are an obligation arising from future IMO mandatory instruments to provide or retain information or data.

Instructions:

(A) If the answer to any of the questions below is **YES**, the Member State proposing an output should provide supporting details on whether the requirements are likely to involve start-up and/or ongoing costs. The Member State should also give a brief description of the requirement and, if possible, provide recommendations for further work (e.g. would it be possible to combine the activity with an existing requirement?).

(B) If the proposal for the output does not contain such an activity, answer **NR** (Not required).

(C) For any administrative requirement, full consideration should be given to electronic means of fulfilling the requirement in order to alleviate administrative burdens.

1. Notification and reporting? Reporting certain events before or after the event has taken place, e.g. notification of voyage, statistical reporting for IMO Members.	**NR**	~~Yes~~ ☐ ~~Start-up~~ ☐ ~~Ongoing~~
Description of administrative requirement(s) and method of fulfilling it: (if the answer is yes). Reporting similar to the work already done.		
2. Record-keeping? Keeping statutory documents up to date, e.g. records of accidents, records of cargo, records of inspections, <u>records of education.</u>	~~NR~~	**Yes** ☐ ~~Start-up~~ ☐ ~~Ongoing~~
Description of administrative requirement(s) and method of fulfilling it: (if the answer is yes) Keep appropriate MET Documentation		
3. Publication and documentation? Producing documents for third parties, e.g. warning signs, registration displays, publication of results of testing.	**NR**	~~Yes~~ ☐ ~~Start-up~~ ☐ ~~Ongoing~~
Description of administrative requirement(s) and method of fulfilling it: (if the answer is yes)		
4. Permits or applications? Applying for and maintaining permission to operate, e.g. certificates, classification society costs.	**NR**	~~Yes~~ ☐ ~~Start-up~~ ☐ ~~Ongoing~~
Description of administrative requirement(s) and method of fulfilling it: (if the answer is yes)		
5. Other identified requirements?	**NR**	~~Yes~~ ☐ ~~Start-up~~ ☐ ~~Ongoing~~
Description of administrative requirement(s) and method of fulfilling it: (if the answer is yes)		

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ANNEX 2

CHECKLIST FOR CONSIDERING HUMAN ELEMENT ISSUES BY IMO BODIES

Instructions: If the answer to any of the questions below is: (A) YES, the preparing body should provide supporting details and/or recommendation for further work. (B) NO, the preparing body should make proper justification as to why human element issues were not considered. (C) NA (Not Applicable) the preparing body should make proper justification as to why human element issues were not considered applicable.	
Subject Being Assessed: (e.g. resolution, instrument, circular being considered) STCW Convention, STCW Code	
Responsible Body: (e.g. committee, sub-committee, working group, correspondence group, Member State) HTW	
1 Was the human element considered during development on amendment process related to this subject?	X **Yes** ☐ No ☐ NA
2 Has input from seafarers or their proxies been solicited?	X **Yes** ☐ No ☐ NA
3 Are the solutions proposed for the subject in agreement with existing instruments? (Identify instruments considered in comments section)	X **Yes** ☐ No ☐ NA
4 Have human element solutions been made as an alternative and/or in conjunction with technical solutions?	☐ Yes X **No** ☐ NA
5 Has human element guidance on the application and/or implementation of the proposed solution been provided for the following:	X **Yes** ☐ No ☐ NA
• Administrations?	X **Yes** ☐ No ☐ NA
• Shipowners/managers?	X **Yes** ☐ No ☐ NA
• Seafarers?	X **Yes** ☐ No ☐ NA
• Surveyors?	X **Yes** ☐ No ☐ NA
6 At some point, before final adoption, has the solution been reviewed or considered by a relevant IMO body with relevant human element expertise?	X **Yes** ☐ No ☐ NA
7 Does the solution address safeguards to avoid single person errors?	X **Yes** ☐ No ☐ NA
8 Does the solution address safeguards to avoid organizational errors?	X **Yes** ☐ No ☐ NA
9 If the proposal is to be directed at seafarers, is the information in a form that can be presented to and is easily understood by the seafarer?	X **Yes** ☐ No ☐ NA
10 Have human element experts been consulted in the development of the solution?	X **Yes** ☐ No ☐ NA
11 Human Element: Has the proposal been assessed against each of the factors below?	

CREWING. The number of qualified personnel required and available to safely operate, maintain, support and provide training for system.	☒ **Yes** ☐ No ☐ NA
PERSONNEL. The necessary knowledge, skills, abilities and experience levels that are needed to properly perform job tasks.	☒ **Yes** ☐ No ☐ NA
TRAINING. The process and tools by which personnel acquire or improve the necessary knowledge, skills and abilities to achieve desired job/task performance.	☒ **Yes** ☐ No ☐ NA
OCCUPATIONAL HEALTH AND SAFETY. The management systems, programmes, procedures, policies, training, documentation, equipment, etc. to properly manage risks.	☒ **Yes** ☐ No ☐ NA
WORKING ENVIRONMENT. Conditions that are necessary to sustain the safety, health and comfort of those on working board, such as noise, vibration, lighting, climate and other factors that affect crew endurance, fatigue, alertness and morale.	☒ **Yes** ☐ No ☐ NA
HUMAN SURVIVABILITY. System features that reduce the risk of illness, injury, or death in a catastrophic event such as fire, explosion, spill, collision, flooding or intentional attack. The assessment should consider desired human performance in emergency situations for detection, response, evacuation, survival and rescue and the interface with emergency procedures, systems, facilities and equipment.	☒ **Yes** ☐ No ☐ NA
HUMAN FACTORS ENGINEERING. Human-system interface to be consistent with the physical, cognitive and sensory abilities of the user population.	☒ **Yes** ☐ No ☐ NA

Comments: (1) Justification if answers are NO or Not Applicable. (2) Recommendations for additional human element assessment needed. (3) Key risk management strategies employed. (4) Other comments. (5) Supporting documentation.

The proposal intends to provide assistance for Parties to STCW 78; and all stakeholders relevant to training and certification of prospective officers to reach OBT standards in accordance with the following STCW 78 regulations:

Regulation II/1 *Mandatory minimum requirements for certification of officers in charge of a navigational watch on ships of 500 gross tonnage or more;*

Regulation III/1 *Mandatory minimum requirements for certification of officers in charge of an engineering watch in a manned engine-room or designated duty engineers in a periodically unmanned engine-room*; and

Regulation III/6 *Mandatory minimum requirements for certification of electro-technical officers.*

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ANNEX 3

**Draft approaches to be considered in order to assist relevant parties in ensuring
the quality of Onboard Training of prospective officers for issuing them with
Certificates of Competency**

Taking into account that STCW 78 contains the entire generic regulatory framework for setting in place the national mechanisms for OBT for prospective officers and for assisting relevant parties in improving the efficiency and quality of these mechanisms, the following approaches for developing the appropriate provisions are proposed by the co-sponsors:

Approach 1. It can be done through analysis of STCW 78 by developing appropriate wording (amendments, unified interpretations) in the context of OBT to the provisions of the article II (Definitions), regulations I/1 (Definitions and clarifications), I/6, I/7, I/8, I/10, I/14, I/16, II/1, III/1 and III/6.

Approach 2. Including the OBT for prospective officers in the Safety Management System as per the ISM Code. The principles and objectives of the ISM Code provide an international standard for the safe management and operation of ships and for pollution prevention. The success of its implementation depends, to a great extent, on the continued commitment, competence, attitudes and motivation of prospective officers, at all levels, in the company and on board ships to which the ISM Code applies.

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