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Agenda item 15

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WORK PROGRAMME OF THE COMMITTEE AND SUBSIDIARY BODIES

Comments on document MEPC 73/15/1

Submitted by ICS

SUMMARY

Executive summary: This document provides comments on document MEPC 73/15/1 (China), which proposes a new output to develop a model course under the International Convention for the Control and Management of Ships' Ballast Water and Sediments, 2004 (BWM Convention)

Strategic direction, if applicable: 1

Output: Proposal of a new output

Action to be taken: Paragraph 17

Related documents: MEPC 72/4/10, MEPC 72/17 and MEPC 73/15/1

1 This document is submitted in accordance with paragraph 6.12.5 of the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.1), and provides comments on document MEPC 73/15/1 (China), which proposes a new output to develop a model course under the International Convention for the Control and Management of Ships' Ballast Water and Sediments, 2004 (BWM Convention).

Background

2 At its seventy-second session, the Committee considered document MEPC 72/4/10 (China), containing a proposal to develop a model course under the BWM Convention to standardize the training, certification and watchkeeping for seafarers related to ballast water management. During the ensuing discussion, some delegations were of the view that more information should first be compiled regarding the specific needs for seafarer training on ballast water management. As a result, the Committee invited the delegation of China to submit a proposal for a new output at a future session, taking into account the comments and concerns expressed at MEPC 72 (see document MEPC 72/17, paragraphs 4.46 to 4.48).

3 In document MEPC 73/15/1, China provides a proposal for a new output regarding the development of the seafarer model course under the BWM Convention for consideration and decision by the Committee.

4 ICS thanks China for the proposal contained in document MEPC 73/15/1, which serves to raise the important issue of training related to ballast water management at IMO.

5 Recognizing that the Committee may agree an output concerning seafarer training related to ballast water management at this session, ICS has submitted this document to discuss the proposal contained in document MEPC 73/15/1 (China) and to propose a modification to the scope of the output.

Discussion

6 ICS agrees that seafarers require generic training related to ballast water management appropriate to their capacities, duties and responsibilities on board ships.

7 Compliance with the BWM Convention has resulted in the introduction of, inter alia, new ships' equipment (i.e. ballast water management systems), new onboard procedures (e.g. procedures for the safe handling and packaging of sediment) and new designated responsibilities (e.g. an officer designated in charge of ballast water management). Furthermore, the proper operation and maintenance of ballast water management systems and implementation of ships' ballast water management plans by seafarers is essential to compliance with the BWM Convention. Consequently, there are a number of areas that have been identified where generic training for seafarers, appropriate to their capacities, duties and responsibilities on board ships, is considered necessary in support of an effective safety management system (SMS).

8 Therefore, ICS supports further consideration of seafarer training related to ballast water management, and appropriate action taken by IMO to address it.

9 However, ICS questions whether the appropriate starting point for this work is the development of a model course under the BWM Convention.

10 The key concerns of ICS in relation to the proposal are as follows:

- .1 It makes the assumption that the most appropriate approach and priority action to address a seafarer training need is to develop a new model course. This approach differs from the normal approach when a new seafarer training need is identified and brought to the attention of IMO.
- .2 It may not adequately consider other approaches or actions available to address the issue, such as the development of possible minor amendments to chapters II and III of the STCW Code. These could not be considered or discussed due to the scope of the proposed output.
- .3 It pre-empts and precludes a more comprehensive discussion on seafarer training related to ballast water management. It would not afford the HTW Sub-Committee the opportunity to make recommendations based on its expertise in seafarer training matters.

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- .4 It would not appear to recognize that seafarer training should be based on seafarers' capacities, duties and responsibilities on board ships. It is unrealistic to expect those differences could be taken into account in a single model course without compromising either the relevance of much of its content to many seafarers, or the quality and value of its content in general.
 - .5 It suggests that seafarer training related to ballast water management can be "systematically standardized" by means of a model course. This is an unrealistic expectation due to the status of model courses and the varying extents to which Administrations and training institutions worldwide make use of IMO model courses. Only the STCW Convention can provide such standardization.
 - .6 It would not appear to recognize that the development of a model course would not normally fall under the purview of the HTW Sub-Committee unless it is to be derived from requirements of the STCW Convention. This is evidence that more comprehensive discussion of the issue is required, and that a model course related to seafarer training should not be developed until, for example, any possible minor amendments to chapters II and III of the STCW Code might be finalized.
 - .7 It does not take account of some potential problems that may result from the development and promulgation of a model course that is not derived from requirements of the STCW Convention. These include the proliferation of training courses that do not adequately meet the needs of seafarers and shipowners, confusion about the existence of training requirements, and inconsistency in seafarer training.

11 Additionally, ICS queries some aspects of the analysis provided in paragraph 8 of document MEPC 73/15/1 (China), and would comment as follows:

- .1 Regarding "seafarers", a new model course that endeavours to address generic training related to ballast water management for all seafarers, regardless of their capacity, duties or responsibilities on board ships, is unlikely to be an efficient or effective approach to providing seafarers with the necessary generic training. It also risks requiring the attendance of seafarers at additional training courses and thus contributing to their already significant training burden.
- .2 Regarding "shipowners", the development of a model course in the absence of any relevant requirements in the STCW Convention is likely to be of limited value to the industry because it is unlikely to lead to consistency in the generic training of seafarers related to ballast water management.
- .3 Regarding "Administrations", the "standardization" of seafarer training is normally achieved by means of mandatory minimum training requirements in the STCW Convention, and not through the development of model courses.

Proposal

12 To address the matters discussed in paragraphs 10 and 11 above, ICS proposes that the scope of the output is modified to enable a comprehensive discussion of seafarer training related to ballast water management. This is with a view to avoid limiting or precluding consideration of other approaches that might be appropriate to address seafarer training related to ballast water management at IMO.

13 To that end, ICS proposes that the description for the output is modified as follows:

"Development of training provisions for seafarers related to the BWM Convention"

14 This proposal would therefore not preclude a model course from being developed (or potentially the updating of existing model courses) under the modified output, if and when appropriate.

Benefits

15 ICS considers that the benefit of this modification would be assurance for all concerned that there would be a comprehensive discussion of the issue and that it would facilitate consideration of other approaches that might be appropriate to address seafarer training related to ballast water management.

16 Specific benefits would include:

- .1 expanding the scope of the output would avoid the work being constrained to the development of a model course only;
- .2 enabling the HTW Sub-Committee to have a comprehensive discussion would facilitate consideration of other approaches, such as the development of possible minor amendments to chapters II and III of the STCW Code; and
- .3 deferring a decision on the development of a model course until after the HTW Sub-Committee has the opportunity to discuss the issue would ensure that the most appropriate action is taken with regard to model courses.

Action requested of the Committee

17 The Committee is invited to consider the comments provided in the document, in particular the proposal in paragraphs 12 to 14 and its benefits outlined in paragraphs 15 and 16, and take action as appropriate.
