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| SUB-COMMITTEE ON HUMAN ELEMENT, TRAINING AND WATCHKEEPING6th session Agenda item 12 | HTW 6/12/322 February 2019Original: ENGLISHPre-session public release: [ ]  |

**ANY OTHER BUSINESS**

**Comprehensive review of the STCW Convention and Code**

**Submitted by ICS**

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| **SUMMARY** |
| *Executive summary:* | This document outlines some concerns of shipowners and operators regarding the 1978 STCW Convention, as amended, and discusses its next comprehensive review by the Organization. |
| *Strategic direction, if applicable:* | 1 |
| *Output:* | Not applicable |
| *Action to be taken:* | Paragraph 20 |
| *Related documents:* | STCW/CONF.2/32 |

**Introduction**

1. The International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW), 1978, was adopted with the objective of promoting safety of life and property at sea and the protection of the marine environment by establishing international standards of training, certification and watchkeeping for seafarers.

**Aim of this paragraph is to identify the “objective” of the STCW Convention because in paragraph 8 a statement is made about it meeting its “objective”.**

1. The 1978 STCW Convention entered into force on 28 April 1984. Amendments thereto were adopted in 1991, 1994, 1995, 1997, 1998, 2004, 2006, 2010, 2014, 2015 and 2016. Major amendments were adopted in 1995 and 2010.

**Aim of this paragraph is to establish the extensive history of amendments to the STCW Convention and identify the major amendments adopted in 1995 and 2010, which are then further explained in paragraphs 3 and 4.**

1. The comprehensive review leading to the 1995 amendments resulted from calls by the industry in the early 1990s, led by ICS, to address concerns regarding the standards of seafarer training and certification in some of the new seafarer supply countries that emerged during the 1980s. The 1995 amendments introduced *inter alia* the STCW Code with its tables of competence, functions and levels of responsibility, the concept of flag State endorsements attesting to the recognition of certificates, and provisions on quality standards.

**Aim of this paragraph is to highlight the fact it was the industry that called for the review that led to the 1995 amendments and indicate that those amendments introduced the most significant important changes in the history of the STCW Convention. The reason for doing this is to show that ICS has previously been responsible for calling for a comprehensive review of the STCW Convention. It also serves to contrast the extent of the 1995 amendments with the 2010 Manila Amendments.**

4 The 2010 amendments (known as the 2010 Manila Amendments) resulted from the confluence of a number of existing work items in the Sub-Committee on Standards of Training and Watchkeeping (STW). These included work on the development of security-related training provisions as a result of adoption of the ISPS Code, and standards of training for ratings to replace the ILO Certification of Able Seamen Convention, 1946 (No. 74) with provisions in the STCW Convention and Code. Some new proposals were also considered, including the development of provisions establishing new capacities and certificates (e.g. for electro-technical officers and able seafarers) and new competences (e.g. in use of ECDIS).

**Aim of this paragraph is to summarize the 2010 Manila Amendments and explain that those amendments should be seen as a “piecemeal” revision of the STCW Convention and Code because the exercise was not the result of an explicit call for a comprehensive review, but instead began as the result of the confluence of a number of existing work items of the STW Sub-Committee.**

1. The Conference of the Parties which adopted the 2010 Manila Amendments also adopted other resolutions, including Resolution 15 on “Future amendments and review of the STCW Convention and Code”, which:

*“RECOMMENDS FURTHER that a comprehensive review of the STCW Convention and Code should, as far as possible, be carried out every ten years to address any inconsistencies identified in the interim; and to ensure that they are up to date with emerging technologies.”*

**Aim of this paragraph is to recall the commitment made by STCW Parties in 2010 that “a comprehensive review of the STCW Convention and Code should, as far as possible, be carried out every ten years”. This is the main procedural reason to justify the conduct of a comprehensive review now. It is important background to the timing considerations referenced in paragraph 6 and further elaborated on in paragraph 16.**

1. Recognizing that it is almost ten years since the adoption of the 2010 Manila Amendments and recalling the positive response when concerns were raised in the early 1990s, ICS considers it necessary to share the concerns of shipowners and operators once again with a view to ensuring that appropriate and timely action is taken by the Organization.

**Aim of this paragraph is to introduce the purpose of the ICS submission to HTW 6 which is to outline concerns of shipowners regarding the STCW Convention and discuss its next comprehensive review by IMO. This paragraph also alludes to a justification for the timing of the ICS submission (referring to the Resolution 15 recalled in paragraph 5) and the fact that ICS concerns have been well-received on a prior occasion regarding the STCW Convention (mentioned in paragraph 3).**

**Discussion**

1. The STCW Convention is meeting its objective if seafarers holding certificates or documentary evidence issued thereunder are competent to perform the functions required on board ships.

**Aim of this paragraph is to establish the “standard” for the STCW Convention to be considered to be “meeting its objective” (identified in paragraph 1), which is that seafarers holding certificates or documentary evidence issued under the STCW Convention are competent to perform the functions required on board ships.**

1. Based on feedback from shipowners and operators, ICS is concerned that the STCW Convention is facing a number of challenges in meeting its objective. These challenges can be categorized as related to the *content*, *structure* or *implementation* of the STCW Convention.

**Aim of this paragraph is to indicate that the comments provided in the ICS submission are based on the feedback provided by shipowners and operators, and state that the main ICS conclusion based on the feedback received is that the STCW Convention is facing a number of challenges in meeting its objective. This is based on a comparison between the “feedback” and the “standard” established in paragraph 7. This paragraph also introduces the three areas where ICS has identified some challenges, namely related to the contents, structure and implementation.**

*Content*

1. The feedback provided to ICS by shipowners and operators indicates that:

 .1 companies are identifying areas where seafarers require additional training prior to being assigned to ships to address gaps in competence, even though the gaps should have been covered in training which achieves the minimum standards of competence established by the STCW Convention; and

 .2 companies are finding that some seafarers do not have an appropriate level of competency to serve in the capacities or perform the functions specified on their certificates issued in accordance with the STCW Convention, without additional training or seagoing experience.

**Aim of these paragraphs is to report the concern of companies that some seafarers are holding certificates but do not seem to meet the standard of competence expected based on what it is specified on their certificates. Some companies are also reporting that some of the “minimum standards” established by the STCW Convention and Code may (soon) no longer be set at the “appropriate level”. These reports could be indicative of a number of problems with the contents or implementation of the STCW Convention (or both).**

**It should be emphasized that this feedback should not be seen in any way as criticism of seafarers, Administrations or MET institutions because the aim of the ICS submission is to suggest that causes of the challenges are likely to be found within the STCW Convention (i.e. due to its contents, structure and implementation). Furthermore, the minimum standards of competence to be met for the issue of a certificate are defined in the STCW Code and not by other stakeholders.**

**For example, some companies report arranging for seafarers to attend additional training or competency assessment courses on subjects addressed in the STCW Code, e.g. on passage planning, bridge watchkeeping basics, ship-handling skills, marine engineering basics, practical workshop skills, and repair of electronic control equipment.**

**Some companies also report needing to have seafarers serve on board ships in supernumerary capacities or at a lower rank for additional periods of time to compensate (i.e. additional seagoing experience).**

10 On the basis of the feedback, ICS has identified some challenges related to the contents of the STCW Convention and Code. Examples include:

.1 some of the abilities specified in the standards of competence established in the STCW Code may no longer reflect the abilities required by seafarers now, or in the near future; and

**Aim of this paragraph is to suggest that there may be a need to review some of the abilities specified in the STCW Code. Identifying these would form part of the comprehensive review and ICS would not want to prejudge the outcome of the exercise. However, there may be some abilities that may no longer be required and some new abilities that could be important to include (e.g. 21st century skills). Common areas of additional training provided by companies may be indicative of some of the areas which should be introduced to the STCW Code.**

.2 some of the minimum requirements to qualify for certification under the STCW Convention may no longer be at a level considered appropriate for seafarers to be competent to perform the functions required now, or in the near future.

**Aim of this paragraph is to suggest that there may be a need to review some of the minimum requirements to qualify for certification under the Convention to determine whether they are at the “appropriate level” now and if they are likely to be so in the future. It should be noted that “Minimum requirements” includes minimum standards of competence, age, medical fitness and seagoing service experience.**

**It should be emphasized that whilst the STCW Code sets out the “minimum” standards, shipowners should be able to expect that those standards are set at a level that ensures that seafarers holding certificates or documentary evidence issued under the STCW Convention are competent to perform the functions required on board ships (i.e. an ”appropriate level”). If a comprehensive review identifies that they are not at the “appropriate level”, the current “minimum” may then need to be changed. Identifying any necessary changes to the minimum requirements would form part of the comprehensive review and ICS would not want to prejudge the outcome of the exercise.**

*Structure*

11 The feedback provided to ICS by shipowners and operators indicates that:

.1 the STCW Convention is seen as an amalgam of disparate requirements developed over time. This has resulted in inconsistencies, the need for interpretations, and posed difficulties for harmonized implementation;

**Aim of this paragraph is to report the concern of companies that many new requirements have been introduced to the STCW Convention, including a considerable number with the 2010 Manila Amendments, without any apparent consideration of how to facilitate their harmonized implementation and avoid the need for interpretations etc.**

.2 there is seen to be a reluctance to utilize some of the flexibility afforded by the structure of the STCW Convention and Code (e.g. the functions and levels of responsibility). This is despite the possibilities flexibility offers; and

**Aim of this paragraph is to report the concern of companies that there has been a reluctance to further progress the introduction of the functions and levels of responsibility with the 1995 amendments, which could be explored in the context of ensuring that the STCW Convention is designed to respond or adapt to developments (see the high-level aim suggested in paragraph 17.3).**

.3 the quality, perceived status and nature of the use of IMO model courses is seen as confusing. This has resulted in the need for clarifications (e.g. STCW.7/Circ.24/Rev.1).

**Aim of this paragraph is to report the concern of companies about the reliance on model courses by many Administrations and MET institutions, and whether they are actually designed to be able to fully support implementation of the STCW Convention (not least given the variation in their quality). It also reports some concern that confusion about the status of model courses persists despite the issuance of STCW.7/Circ.24/Rev.1.**

12 On the basis of the feedback, ICS has identified some challenges related to the structure of the STCW Convention. Examples include:

.1 a holistic review of the structure of the STCW Convention has not been undertaken since the development of the 1995 amendments, meaning there has been no recent assessment to determine whether the structure remains suitable or appropriate;

**Aim of this paragraph is to highlight that it has been over 20 years since there was a proper holistic review of the structure of the STCW Convention, and no recent assessment of whether it remains suitable. The inference is that the structure is outdated and overdue for review.**

.2 amendments adopted to the STCW Convention and Code over the years, have introduced a significant number of new concepts and requirements without sufficient consideration being given to the ability of the structure to accommodate them and facilitate their implementation; and

**Aim of this paragraph is to identify the fact that there has been insufficient consideration of the ability of the structure of the STCW Convention to actually support all the amendments that have been introduced over the years. For example, the 2010 Manila Amendments added provisions containing new requirements, without considering what requirements could be removed or re-organized to accommodate the new ones.**

**ICS considers that a form of neglect of the structure of the STCW Convention since 1995 may be the cause of some of the current difficulties of implementation.**

.3 there is widespread reliance on the IMO model courses to assist with implementation of the STCW Convention, to the extent that the current relationship between the STCW Code and the IMO model courses raises questions as to whether the structure remains suitable or appropriate.

**Aim of this paragraph is to identify that IMO model courses are, in many cases, wholly relied upon to implement the STCW Convention. In some cases they are copy-pasted directly into maritime curricula or directly used as a “checklist” for the approval of courses. This is not what was intended by their development and is not reflective of their actual status. The varying quality of model courses adds to concern about the contemporary nature of their use.**

**ICS considers that the level of reliance on model courses is now becoming a cause for concern to the extent that a comprehensive review should re-examine: 1) the “role” of model courses in supporting implementation of the STCW Convention, 2) the actual relationship between the model course programme and the STCW Code, and 3) the consistency and level of detail provided in the STCW Code (which may itself be behind the reliance on the model courses).**

*Implementation*

13 The feedback provided to ICS by shipowners and operators indicates that:

.1 there are difficulties experienced and expected related to the timely training and certification of seafarers following amendments to the STCW Convention and Code; and

 **Aim of this paragraph is to report the concern of companies about the now predictable difficulties faced following amendments to the STCW Convention and Code, whereby shipowners must wait *inter alia* for national legislation to be in place and any necessary interpretations, wait for the approval or courses, wait the organization of courses etc. This must all be completed prior to a company arranging to send applicable seafarers to obtain any required training and associated certificate/documentary evidence. Companies have been left with little or no time before entry into force or the end of any transition periods to ensure that their seafarers are trained and/or certificated in accordance with the new requirements. Clearest example of this issue was the difficulties preparing for the entry into force of the security-related training of the 2010 Manila Amendments from 1 January 2014. This was recognized as an issue by IMO in STCW.7/Circ.21.**

.2 the list provided in MSC.1/Circ.1163, which indicates the Parties confirmed by the Maritime Safety Committee to have communicated information which demonstrates full and complete effect is given to the relevant provisions of the STCW Convention, is not seen by companies as a reliable or useful source of information related to the training and certification of seafarers.

 **Aim of this paragraph is to report the concern of companies about the “STCW Whitelist” (formally known as MSC.1/Circ.1163), specifically that it is not a reliable or useful source of information for companies. Administrations should be also be concerned about the list given its relevance to the recognition of certificates. It is considered unreliable because almost every STCW Party is on the list and it does not appear that there is a currently functioning mechanism where a country may be removed. This is despite known difficulties with implementation. Recognition of this issue may be the reason the IMO Secretariat has submitted document HTW 6/12 to HTW 6. It is also considered unreliable because it does not provide, for example, information about whether a country is on the list for the “full” STCW Convention (e.g. officer training etc.) or only for some parts (e.g. just basic training, rating training etc.).**

14 On the basis of the feedback, ICS has identified some challenges related to implementation of the STCW Convention and Code. Examples include:

.1 experience has shown that transitional provisions, on more than one occasion, have not provided sufficient time for all stakeholders concerned to meet their responsibilities and obligations with regard to amendments to the STCW Convention and Code;

 **Aim of this paragraph is to suggest that timeframes agreed for the entry into force of amendments, including transition periods, have not been realistic given the challenges with implementing the STCW Convention.**

 **ICS considers that this is clearly evidenced by the fact that circulars STCW.7/Circ.12, STCW.7/Circ.21 and MSC.1/Circ.1560 have all needed to be issued by IMO to address timely implementation issues and called for pragmatic approaches by PSC for certain periods of time.**

.2 there is insufficient transparency in the communication and consideration of information on implementation required under the STCW Convention; and

 **Aim of this paragraph is to highlight that there is considered to be insufficient transparency in the information communicated to IMO about implementation by Parties to the STCW Convention. Although various stakeholders rely on Parties fully implementing the STCW Convention, these stakeholders do not have an opportunity to sight the information that a Party communicates to the IMO to evidence that it is giving full and complete effect to the STCW Convention.**

**ICS considers this process would appear to lack some important scrutiny or oversight from key stakeholders concerned (e.g. the industry), and further calls into question the current process for updating MSC.1/Circ.1163 (the “STCW Whitelist”).**

.3 there is insufficient robustness and dynamism with the system of reporting and monitoring of implementation of the STCW Convention.

**Aim of this paragraph is highlight that there is considered to be nothing particularly robust about the reporting and monitoring of implementation of the STCW Convention. The use of the term “dynamism” is intended to imply that the process established by regulation I/7 and I/8 of the STCW Convention, along with MSC.1/Circ.1163 and MSC.1/Circ.1164, is too slow and a new process that updates a “living document” is required to ensure the information needed about seafarer training and certification and different MET systems is readily available and up to date at all times.**

**Conclusion**

1. ICS considers the above feedback and challenges indicate the need to conduct a comprehensive review of the STCW Convention and Code, and recommends this be undertaken with a view to ensuring the STCW Convention can meet its objective.

**Aim of this paragraph is to declare the main conclusion of ICS is that there is a need to conduct a comprehensive review of the STCW Convention and Code.**

**The recommendation should be interpreted as a veiled warning about the future of the STCW Convention if a comprehensive review is not initiated soon.**

1. With regards to the timing of the next comprehensive review, ICS recommends that it should be initiated as soon as reasonably practicable, taking into account:

**Aim of this paragraph is to indicate that the ICS position is that the comprehensive review should be initiated “as soon as reasonably practicable”. That expression should be interpreted as meaning “as soon as IMO procedures and any politics allows”.**

**This paragraph also sets out some considerations relevant to the timing of the next comprehensive review of the STCW Convention and Code, which are intended to provide further evidence of the need to conduct it as soon as reasonably possible.**

.1 resolution 15 and the stated recommendation of Parties in 2010 to conduct a comprehensive review of the STCW Convention and Code, as far as possible, every ten years, which would therefore appear to have been envisaged for 2020 or soon thereafter;

 **Aim is to highlight that the Parties and IMO are approaching the time when they envisaged that they would conduct the next comprehensive review (recalled in paragraph 5). The agreement of resolution 15 in 2010 was based on an understanding and acknowledgement by all concerned that the process would need to begin again in ten years’ time, the wisdom of which ICS considers cannot be overlooked now.**

.2 the impact of the current pace of technological, regulatory and operational developments on requirements for the training of seafarers, and the need for this to be adequately accounted for by the STCW Convention and Code; and

**Aim is to highlight the different types of developments that will impact on the roles of seafarers on board ships. These are indicated because they are important to acknowledge as a key challenge for the review. ICS also considers that consideration may be the one that resonates best with some delegations, given the current climate of enthusiasm and interest in the pace and impact of technological developments, increasing automation of ship systems, equipment and operations etc.**

.3 the fact that a comprehensive review leading to a revision of the STCW Convention is likely to require around ten years to fully come into effect, due to the time it will take to prepare, adopt and enter into force.

 **Aim is to highlight the actual length of time that the process of conducting a comprehensive review of the STCW Convention and Code would take at IMO, from the time of a proposal for a new output to the entry into force of any revision adopted as a consequence.**

**If there are any concerns that the end of the transition period for the 2010 Manila Amendments has only just passed at the beginning of 2017 or there is “fatigue” from their implementation, ICS considers it should be recalled that the whole process could take 10+ years to complete meaning that implementation of the next revision would be unlikely to be required until around 2026.**

**ICS has identified that the earliest beginning of the comprehensive review, if initiated “as soon as reasonably practicable”, would be HTW 8 being held in 2021. A possible timeline to explain is as follows:**

* **The earliest opportunity for the submission and agreement of a new output required to conduct the comprehensive review would likely be MSC 102 (mid-2020);**
* **The earliest opportunity to receive submissions and begin proper work on the comprehensive review would likely be HTW 8 (late-2021), which is because HTW 7 will be held only a matter of weeks after MSC 102 in 2020;[[1]](#footnote-1)**
* **The earliest a comprehensive review could be completed would likely be 2025, based on the fact the work culminating in 1995 and 2010 amendments took around four years to complete;**
* **The earliest any comprehensive revision of the STCW Convention and Code could be adopted by an expanded MSC or Diplomatic Conference would be sometime in 2025; and**
* **The earliest any comprehensive revision of the STCW Convention and Code could therefore enter into force might be 2027, followed by any transition periods (potentially lasting until 1 January 2030).**

17 Some high-level aims and priorities for the next comprehensive review could be:

**Aim of this paragraph was to provide some indication of what ICS envisages could be some of the high-level aims and priorities for the next comprehensive review.**

.1 to ensure the STCW Convention delivers seafarers competent to perform the functions required on board ships;

 **Aim of this paragraph to suggest that the next comprehensive review must have as a primary focus ensuring that the STCW Convention will be able to consistently deliver competent seafarers who can perform the functions at the level of responsibility specified on their certificates (i.e. put simply – meet the needs of the industry).**

.2 to ensure the STCW Convention continues to provide a set of internationally recognized standards for training and certification of seafarers;

**Aim of this paragraph is to suggest that the next comprehensive review must secure the position of the STCW Convention and associated role of IMO in regulating seafarer training and certification. ICS considers that regional requirements are an ever present threat to international standards and shipowners cannot afford this threat to be realized in the domain of seafarer training and certification. As stated at the end of paragraph 18, the availability of a global supply of seafarers to shipowners relies on the existence of the STCW Convention.**

.3 to ensure the STCW Convention is designed to respond or adapt to the pace of technological, regulatory and operational developments;

**Aim of this paragraph is to suggest that the next comprehensive review must address the fact that digitalization and automation will change the way ships are operated. ICS anticipates that there will be increasing authority for decision-making given to systems and equipment, with complementary changes in the purpose and frequency of the human interventions. New ship’s equipment and systems will need to be monitored, maintained and repaired on board (or not). These developments will inevitably change the functions seafarers perform on board ships and, as a direct consequence, the skills and training they require for their roles.**

**As it will be difficult to identify what the future may hold for the world fleet during a comprehensive review, ICS considers that it will be prudent to ensure that that the STCW Convention is “designed” to be sufficiently flexible, responsive and adaptable. Some existing features of the STCW Convention could be enhanced as a starting point, but the possibility of “future-proofing by design” would need to be further considered during the comprehensive review.**

.4 to ensure reporting and monitoring of implementation of the STCW Convention is appropriately transparent, robust, and dynamic; and

 **Aim of this paragraph is to indicate that the output of the current system as established by regulation I/7 and I/8 is not considered satisfactory in terms of its transparency, robustness and dynamism.**

**ICS considers that the contribution of the STCW Convention to safe, secure, environmentally sound, and efficient ship operations requires full and complete effect to be given to its provisions by its Parties. It would be expected that increased transparency and robustness would result in better and more consistent implementation and more reliable information being available to all stakeholders concerned.**

.5 to ensure the STCW Convention is structured and organized in a manner facilitating harmonized and consistent implementation.

**Aim of this paragraph was to indicate to Member States (Parties to STCW) that a comprehensive review of the STCW Convention and Code should not be seen as likely to result in “a lot of work” or “new burden”. ICS considers that a comprehensive review should aim to introduce changes and improvements that make it easier to implement.**

18 ICS considers that appropriate and timely action by the Organization regarding the STCW Convention is essential to supporting safe, secure, environmentally sound, and efficient ship operations. It is foreseen that the next comprehensive review will result in the most critical revision in the history of the STCW Convention. This is because it must secure its role, and that of the Organization, in maintaining international standards of training and certification of seafarers. The availability of a global supply of seafarers to shipowners and operators and the economic mobility of seafarers both rely on the STCW Convention meeting its objective.

**Aim of this paragraph is to suggest that, if a comprehensive review of the Convention and Code is not undertaken as soon as reasonably practicable, IMO and its Member States could be seen as not taking all potentially necessary actions to ensure the international maritime regulatory framework effectively supports safe, secure, environmentally sound, and efficient ship operations.**

**It also indicates that ICS foresees that the next review is critical to ensuring the role of IMO and the STCW Convention in setting the international standards for training and certification of seafarers. The implication being that there could be a risk of regional standards being developed or even new approaches to seafarer training being explored. For example, an EU “STCW+” or some form of “maritime certificate of excellence” has begun to be discussed in Europe in early-2019.**

**Proposal**

1. ICS proposes a preliminary discussion during HTW 6 in order to obtain indications of support in principle, or otherwise, for conducting a comprehensive review of the STCW Convention and Code. Such a discussion could inform the development of a submission of a proposal by interested Member States and international organizations for the inclusion of a new output at a future session of the Maritime Safety Committee.

**Aim of this paragraph is to explain that ICS is only seeking a “preliminary discussion” at HTW 6 (just 20 minutes of time during plenary) in order to get an indication of whether IMO Member States (and international organizations) are interested in undertaking a comprehensive review of the STCW Convention and Code starting in the next couple of years. Any comments/interventions would be used to inform the preparation of the submission proposing a new output at MSC in order to ensure it takes into account all perspectives, aims, priorities and concerns about the next comprehensive review.**

**ICS hopes that at least one IMO Member State(s) might come forward to ICS during or after HTW 6 to indicate that it would be willing to “champion” the submission of a proposal for a new output to MSC 102 (2020). Such an IMO Member State would be seen to be demonstrating its commitment and leadership to other Member States at IMO related to seafarer training and certification as an essential component of safe, secure and environmentally sound ship operations.**

1. Therefore, ICS proposes that the Sub-Committee:
	1. notes the concerns of shipowners and operators that the STCW Convention is facing a number of challenges in meeting its objective;

**Aim of this paragraph is to ensure that ICS concerns about the STCW Convention are written into IMO record (i.e. the report of HTW 6) in May 2019, which can then be referred to as necessary at a later date.**

* 1. notes the recommendation of ICS to conduct a comprehensive review of the STCW Convention and Code as soon as reasonably practicable; and

**Aim of this paragraph is to ensure that the ICS recommendation about conducting a comprehensive review of the STCW Convention and Code is written into IMO record (i.e. the report of HTW 6) in May 2019, which can then be referred to as necessary at a later date.**

* 1. encourages views to be expressed by member States and international organizations during a preliminary discussion at HTW 6 regarding the next comprehensive review of the STCW Convention and Code.

**Aim of this paragraph is to reinforce the ICS proposal in paragraph 19 and seek the indulgence of the Sub-Committee and ensure that delegations at HTW 6 are invited by the Chair to share their preliminary views on conducting a comprehensive review of the STCW Convention and Code, including their support (or not) for doing so at IMO as soon as reasonably practicable.**

**Action requested of the Sub-Committee**

1. The Sub-Committee is invited to consider the comments provided and the proposal in paragraph 20, and take action as appropriate.
1. **MSC 100 agreed to convene HTW 7 in the first half of 2020 and HTW 8 in the second half of 2021, i.e. 18 months after the first session of the Sub-Committee in the biennium. A cycle of 18 months between sessions of the Sub-Committee will be reviewed periodically, taking into account its workload (see paragraph 17.34 of document MSC/100). MSC 102 is anticipated to be held in May 2020.** [↑](#footnote-ref-1)