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Agenda item 6

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COMPREHENSIVE REVIEW OF THE 1978 STCW CONVENTION AND CODE

Report of the Working Group

INTRODUCTION

1 The Working Group on Comprehensive Review of the 1978 STCW Convention and Code, chaired by Capt. Cathleen Burns Mauro (United States), met from 10 to 13 February 2025.

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

ANGOLA	MALTA
ARGENTINA	MARSHALL ISLANDS
AUSTRALIA	MEXICO
BAHAMAS	NETHERLANDS (KINGDOM OF THE)
BELGIUM	NEW ZEALAND
BRAZIL	NIGERIA
CANADA	NORWAY
CHINA	PANAMA
COOK ISLANDS	PAPUA NEW GUINEA
CYPRUS	PHILIPPINES
DENMARK	POLAND
ECUADOR	PORTUGAL
ESTONIA	QATAR
FINLAND	REPUBLIC OF KOREA
FRANCE	RUSSIAN FEDERATION
GERMANY	SAUDI ARABIA
GREECE	SINGAPORE
ICELAND	SOUTH AFRICA
INDIA	SPAIN
INDONESIA	SWEDEN
IRAN (ISLAMIC REPUBLIC OF)	THAILAND
IRELAND	TÜRKIYE
JAPAN	UKRAINE
LATVIA	UNITED ARAB EMIRATES
LIBERIA	UNITED KINGDOM
LUXEMBOURG	UNITED STATES
MALAYSIA	

representatives from the following Associate Members of IMO:

FAROES
HONG KONG, CHINA

observers from the following intergovernmental organizations:

EUROPEAN COMMISSION (EC)
MARITIME ORGANISATION FOR WEST AND CENTRAL AFRICA (MOWCA)

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

INTERNATIONAL CHAMBER OF SHIPPING (ICS)
BIMCO
INTERNATIONAL ASSOCIATION OF CLASSIFICATION SOCIETIES (IACS)
OIL COMPANIES INTERNATIONAL MARINE FORUM (OCIMF)
INTERNATIONAL MARITIME PILOTS' ASSOCIATION (IMPA)
INTERNATIONAL FEDERATION OF SHIPMASTERS' ASSOCIATIONS (IFSMA)
INTERNATIONAL ASSOCIATION OF INDEPENDENT TANKER OWNERS
(INTERTANKO)
CRUISE LINES INTERNATIONAL ASSOCIATION (CLIA)
INTERNATIONAL SHIP MANAGERS' ASSOCIATION (INTERMANAGER)
INTERNATIONAL MARINE CONTRACTORS ASSOCIATION (IMCA)
INTERFERRY
INTERNATIONAL ASSOCIATION OF MARITIME UNIVERSITIES (IAMU)
INTERNATIONAL TRANSPORT WORKERS' FEDERATION (ITF)
GLOBAL MARITIME EDUCATION AND TRAINING ASSOCIATION (GMET)
WORLD SHIPPING COUNCIL (WSC)
THE NAUTICAL INSTITUTE (NI)

and observers from the following IMO academic institution:

WORLD MARITIME UNIVERSITY (WMU)

TERMS OF REFERENCE

3 The Working Group was instructed, taking into account comments made and decisions taken in plenary, to:

- .1 finalize the list of gaps identified in the 1978 STCW Convention and Code, based on annex 1 to document HTW 11/6 and taking into account the relevant parts of documents HTW 11/2, HTW 11/6/1, HTW 11/6/2, HTW 11/6/4, HTW 11/6/7, HTW 11/6/19, HTW 11/6/23, HTW 11/6/24, HTW 11/6/26, HTW 11/6/27, HTW 11/6/29 and HTW 11/6/30, as well as any related outcomes from the other IMO bodies;
- .2 taking into account the need to finalize phase 1 (review/identification of gaps) and the list of gaps identified in the STCW Convention and Code before initiating phase 2, consider whether there is any remaining work for phase 1 and how to organize phase 2 (revision) of the comprehensive review;
- .3 taking into account the progress made during this session, as well as sub-paragraph .2 above, update the road map for the comprehensive review, based on annex 6 to document HTW 10/10;

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- .4 if time permits, further consider document HTW 11/6/25 in the context of updating the road map and arrangements for phase 2 of the comprehensive review;
 - .5 finalize 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;
 - .6 prepare draft terms of reference for any intersessional correspondence group(s) on the comprehensive review of the 1978 STCW Convention and Code, to be established at this session, for approval by the Sub-Committee;
 - .7 prepare draft terms of reference for an intersessional correspondence group on the STCW oversight and verification processes, to be established at this session, for approval by the Sub-Committee, taking into account documents HTW 11/6/3, HTW 11/6/5 and HTW 11/6/28; and
 - .8 submit a written report by Thursday, 13 February 2025.

CONSIDERATION OF IDENTIFIED GAPS AND PROVISIONS TO BE ADDRESSED (ToR 1)

4 Having considered the proposals in the documents submitted under this agenda item, the Group reviewed the list of gaps, based on annex 1 to document HTW 11/6, taking into account documents referred to the Group, and took actions as outlined in paragraphs 5 to 48 below. The 1978 STCW Convention and Code is referred thereafter as "the Convention and the Code", and the STCW Code as the "the Code", to improve readability.

5 During consideration of document HTW 11/6/4 (Philippines), in relation to the terminology to be used to designate seafarers' issues on violence and harassment, the Group, noting that MSC 108 had already endorsed the use of the terminology "violence and harassment, including sexual harassment, bullying and sexual assault" in relevant IMO instruments and guidance, as appropriate, with an associated reference to the definition of "violence and harassment" in the ILO Violence and Harassment Convention, 2019 (document MSC 108/20, paragraph 16.11), agreed not to include this proposal in the list of gaps.

Chapter I of the Convention and Code

Regulation I/1 and its corresponding parts of the Code

6 During consideration of document HTW 11/6/4 (Philippines), in relation to the definition "psychological safety", the Group, noting that the ISWG-STCW 1 had already agreed that regulation I/1 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 (document HTW 11/6, paragraph 8), confirmed not to include this proposal in the list of identified gaps.

Regulation I/2 and its corresponding parts of the Code

7 Having considered document HTW 11/6/2 (Secretariat), which provided background information on the clarification of when an endorsement should be issued under the provisions of the Convention and Code, the Group, noting that the term "endorsement" could refer either to the issuance of the certificates (when the issuing and flag State Administration was the same) or their recognition (when the issuing and flag State Administrations were different),

which might lead to confusion, agreed to include this proposal in the list of gaps, as set out in annex 1, page 5.

Regulation I/4 and its corresponding parts of the Code

8 During consideration of document HTW 11/6/27 (Austria et al.), in relation to including familiarization of seafarers as required by regulation I/14 into regulation I/4, the Group, noting that the Convention and Code currently did not include a provision for exercising this control, agreed to include this proposal in the list of gaps, as set out in annex 1, page 13, and recommended caution when evaluating proposals on this issue in phase 2, to ensure that PSCOs did not become assessors of seafarers. In agreeing, the Group noted the view that PSCOs might carry out an operational control to check the effectiveness, communication, interaction and familiarity of the master and crew including procedures and the human interface and or a functional test to check the correct operation of a piece of equipment.

Regulation I/5 and its corresponding parts of the Code

9 The Group recalled that MSC 108 had instructed the Sub-Committee to consider measures to increase (document MSC 108/20, paragraph 16.9):

- .1 awareness, detection, information-sharing and prosecution of fraudulent activities concerning certificates, and agreed to include this matter in the list of specific areas for the comprehensive review of the Convention and Code; and
- .2 cooperation between Parties for the detection and prosecution of fraudulent activities concerning certificates.

10 The Group, noting that the ISWG-STCW 1 had already agreed to consider measures to promote the use of electronic certificates for seafarers, which were effective in preventing fraudulent certificates, and had encouraged Administrations to independently develop measures for electronic data management and security (document HTW 11/6, annex 1, page 14), confirmed to keep this proposal in the list of gaps.

11 The Group recalled that MSC 108 had instructed the Sub-Committee to consider the proposal in paragraph 14.2 of document JTWG-SIHE 2/3/1, on the inclusion of a requirement in regulation I/5 (national provisions) to take action in case of sexual assault, in the context of the comprehensive review (document MSC 108/20, paragraph 16.14).

12 The Group, noting that the ISWG-STCW 1 had already considered the proposal and had concerns it would conflict with national legislation, which varied by Parties, and hence should be left to the national legislation (document HTW 11/6, paragraph 84), confirmed not to include this proposal in the list of gaps.

13 During consideration of document HTW 11/6/4 (Philippines), in relation to providing guidance in section B-I/5 on the mechanism and criteria for verifying effective implementation of measures promoting psychologically safe maritime work environment, the Group, noting that the ISWG-STCW 1 had already agreed it was premature to determine that guidance would be necessary until amendments to the mandatory requirements are developed and agreed upon, agreed not to include this proposal in the list of gaps.

Regulation I/10 and its corresponding parts of the Code

14 During consideration of document HTW 11/6/1 (Austria et al), in relation to the deletion of the terms "if circumstances require" and the alignment of the terms "documentary proof" with other areas of the Convention and Code, the Group, noting that the ISWG-STCW 1 had already agreed to include the consistency of the terms "documentary proof" in the list of gaps (document HTW 11/6, annex 1, page 13), confirmed to keep this proposal in the list.

15 With regard to the terms "if circumstances require" in paragraph 5 of regulation I/10, the Group, noting that these terms were intentional and necessary, and their deletion might cause unintended consequences, agreed not to include this proposal in the list of gaps.

Regulation I/14 and its corresponding parts of the Code

16 During consideration of document HTW 11/6/24 (ICS), in relation to familiarization with policies and implementation procedures on drug and alcohol abuse and for prevention and response to violence and harassment, the Group, noting that the ISWG-STCW 1 had agreed to move guidance on company responsibility for a policy on drug and alcohol abuse in section B-VIII/1, to regulation I/14 and to require company policies and procedures for prevention of and response to violence and harassment in regulation I/14 (document HTW 11/6, annex 1, page 14), confirmed not to include this proposal in the list of gaps.

17 During consideration of document HTW 11/6/4 (Philippines), in relation to additional guidance in section B-I/14 of the Code on establishing and implementing policies and procedures for preventing and addressing violence and harassment, the Group, noting that the ISWG-STCW 1 had already agreed that it was premature to determine if guidance would be necessary until amendments to the mandatory requirements are developed and agreed upon, agreed not to include this proposal in the list of gaps.

Chapter II of the Convention and Code**Table A-II/1**

18 During consideration of document HTW 11/6/1 (Austria et al.), in relation to adding a new competence on the preparation of cargo spaces in section A-II/1, the Group, noting that the ISWG-STCW 1 had already agreed to review all competence requirements in the table of part A of the Code to ensure they were adequate and reflected the duties and responsibilities of seafarers and consider new technology, and to ensure consistent use of terminology throughout the Convention and Code (document HTW 11/6, annex 1, page 28), confirmed not to include this proposal in the list of gaps.

Chapter III of the Convention and Code**Table A-III/1**

19 During consideration of documents HTW 11/6/1 (Austria et al.) and HTW 11/6/30 (India), in relation to adapting the terms "marine diesel engine" in table A-III/1 in a context of new types of engines, the Group, noting that the ISWG-STCW 1 had already agreed to consider this table as part of phase 2 (document HTW 11/6, annex 1, page 44), confirmed to keep this proposal in the list of gaps, and recommended careful consideration to avoid unintended consequences.

Section B-III/1

20 During consideration of document HTW 11/6/1 (Austria et al.), in relation to artificial intelligence (AI) and the need for engineers to be aware of potential faults and consider AI generated outcome with criticism, the Group, noting that the ISWG-STCW 1 had already agreed to consider AI based competences in tables A-III/1, A-III/2, A-III/3, and A-III/6, in phase 2 (document HTW 11/6, annex 1, page 55), and agreed it was premature to determine if guidance would be necessary until amendments to the mandatory requirements are developed and agreed upon, confirmed not to include the proposal in the list of gaps.

Table A-III/6

21 During consideration of document HTW 11/6/1 (Austria et al.), in relation to the review of competences, to ensure that they address adequately the needs for training, and the KUPs assigned are relevant by amending competences, including and re-arranging KUPs when needed, the Group, noting that the ISWG-STCW 1 had already agreed to include this review in phase 2 (document HTW 11/6, annex 1, page 44), confirmed to keep this proposal in the list of gaps. The Group also recommended careful consideration to ensure that the STCW requirements would not be too prescriptive to certain types of ships, and be mindful that familiarization should cover specific ship equipment.

Regulation III/6

22 During consideration of document HTW 11/6/19 (United Kingdom), in relation to the creation of a senior electro-technical officer (ETO) position, the Group, noted the following views expressed:

- .1 the two existing positions (ETO and electro-technical rating) are already sufficient to address the needs of the industry, and duplicating responsibilities with those of chief engineers should be avoided;
- .2 developing new certifications might lead to a new burden;
- .3 companies might decide to establish specific new positions and/or grades which respond to their particular needs, and following internal policies, but these practices should rest with companies and should not interfere with positions set out in the Convention and Code; and
- .4 the management level considerations for ETO's would become significant in the future, as ships incorporated further advances in complex electrical, electronic systems and digitalization. It was prudent to provide a proposal in phase 2 for consideration.

23 The Group, noting that one of the goals of the review was to ensure that new technologies were considered and that seafarers were equipped for ships in the future, agreed to include this proposal in the list of gaps, as set out in annex 1, page 54, and recommended careful consideration when evaluating specific proposals in phase 2.

24 During consideration of document HTW 11/6/30 (India), in relation to including environmental competencies in section A-III/6 to align with GHG reduction targets and sustainability goals, the Group, noting that the ISWG-STCW 1 already agreed to review table A-III/6 regulation in phase 2 to ensure it covers current and emerging technologies (document HTW 11/6, annex 1, page 55), confirmed to keep this proposal in the list of gaps.

Chapter V of the Convention and Code

Regulation V/1-1, sections A-V/1-1, tables A-V/1-1-1 and V/1-1-2, and section B-V/1

25 During consideration of document HTW 11/6/1 (Austria et al.), in relation to the review of training and qualification requirements for crude oil wash, the Group, noting that some requirements on this matter were contained in resolution A.446(XI), which focused on seafarers taking charge of crude oil washing operations and might go beyond the minimum requirement for certification at both the basic and advanced levels for tankship operations. However, the Group agreed to include this proposal in the list of gaps, as set out in annex 1, in page 66, and noted there might be a need for other IMO organs to update other instruments within their purview.

Chapter VI of the Convention and Code

Regulation VI/1

26 During consideration of document HTW 11/6/1 (Austria et al.), in relation to an inconsistency with the requirement for training to be approved in regulations VI/3, VI/4, VI/5 and VI/6, but not in regulation VI/1, the Group agreed to include this proposal in the list of gaps, as set out in annex 1, page 78. However, the Group noted that regulation VI/1 covers both safety familiarization and basic training, and safety familiarization does not require approval.

27 During consideration of document HTW 11/6/1 (Austria et al.), in relation to clarifying the terms "Parties may accept onboard training and experience for maintaining the required standard of competence.", the Group, noting that the competences that can be met through onboard training and experience should be reviewed to ensure they are appropriate for onboard demonstrations, in sections A-VI/1.3, A-VI/1.4, A-VI/2.5, A-VI/2.6, A-VI/2.11, A-VI/3.5 and A-VI/3.6, agreed to include this proposal in the list of gaps, as set out in annex 1, page 79. However, the Group did not agree that onboard training and experience require approval, noting that they provide a critical flexibility for seafarers in maintaining standards of competence.

28 During consideration of document HTW 11/6/1 (Austria et al.), in relation to providing guidance on refresher or updating training of the mandatory minimum requirements related to medical first aid and medical care requirement in section A-VI/4, paragraphs 1 to 3, the Group, noting that guidance in section B-VI/4 may be necessary, agreed to include this proposal in the list of gaps, as set out in annex 1, page 84.

Chapter VII of the Convention and Code

29 During consideration of document HTW 11/6/26 (ICS), in relation to alternative certification for non-maritime graduates, the Group, noting that:

- .1 the ISWG-STCW 1 was unable to give detailed consideration to the gaps identified in chapters VII and VIII;
- .2 this gap was not related to MASS;
- .3 chapter VII was not the place for considering this flexibility or new certificates; and
- .4 the provisions in chapter VII were intentional and robust, and flexibility for consideration of alternative certification already existed,

agreed to include this proposal in the list of gaps, as set out in annex 1, page 89.

Chapter VIII of the Convention and Code

30 During consideration of document HTW 11/6/26 (ICS), in relation to the prescriptive nature of the existing provisions, noting that the ISWG-STCW 1 was unable to give detailed consideration to the gaps identified in chapters VII and VIII, agreed to include this proposal in the list of gaps, as set out in annex 1, page 91, noting a careful approach was necessary to ensure that training requirements will not be downgraded.

31 The Group recalled that MSC 109 had instructed the Sub-Committee to review regulation VIII/2, as a result of the analysis of consolidated audit summary reports (CASRs) (document MSC 109/22, paragraph 15.11). The Group agreed to include this gap in the list, as set out in annex 1, page 91.

Specific areas applicable to multiple chapters

Review of all competence requirements in the tables of part A

32 The Group, recalling the general discussions during the ISWG-STCW 1, agreed to review all competence requirements in the tables of part A of the Code to ensure they were adequate, consistent and reflected the duties and responsibilities of seafarers of the modern shipping. This gap is holistic and is already captured in some parts of annex 1 (for example, in page 44).

ECDIS

33 The Group recalled that MSC 109 had invited Member States and international organizations to submit relevant proposals to the Sub-Committee to address STCW competency requirements for ECDIS S-100 as part of the existing output on the comprehensive review of the 1978 Convention and Code (document MSC 109/22, paragraph 19.34.5).

34 The Group, noting that the ISWG-STCW 1 had already considered ECDIS requirements and agreed to "Review the content for the operation and management of ECDIS taking into consideration the newly adopted performance standards of ECDIS" (document HTW 11/6, annex 1, page 33), confirmed to keep this proposal in the list of gaps.

Action verb taxonomy

35 During consideration of document HTW 11/6/7 (China), in relation to a method of using action verb taxonomy in the review of the Convention and Code, the Group, noting that the inconsistencies in the taxonomy of the current provisions of the Convention and Code needed to be addressed, agreed that the action verb taxonomy in MSC-MEPC.2/Circ.15/Rev.2, appendix 4 should be applied when updating the STCW Convention and Code in order to ensure the consistency and agreed to include this proposal in the list of gaps, as set out in annex 1, page 3.

Simulation and seagoing service

36 During consideration of documents HTW 11/6/23 (United States) and HTW 11/6/29 (India), in relation to the use of simulation training for meeting a portion of seagoing service

requirements of regulation II/1 and for certification at the management and support levels, the Group noted the following views expressed:

- .1 the mandatory minimum requirement of 12 months of sea service for first certificates of competence for approved programmes and regulation II/1 should be retained as currently is;
- .2 while simulators were an effective training tool for risk reduction and for repetitive tasks, simulator training cannot replicate the complexities, unpredictability and psychological pressures of real-life conditions at sea;
- .3 for common and universal implementation as well as maintaining the quality, "criteria including a cap", for simulator training that could meet a portion of required seagoing service for certification should be developed;
- .4 simulators at all levels might be used for a portion only of the mandatory minimum requirement of 12 months of sea service, but without downgrading training standards, bearing in mind that simulating techniques have greatly improved in the last years;
- .5 benefits from using simulators should be recognized and used to gain skills at shorter times it would take at sea, noting that the use of simulators should be optional and not mandatory, and left at the discretion of each Administration;
- .6 the management level should be excluded when considering the use of simulators or meeting minimum mandatory sea service requirements;
- .7 the use of simulators should focus of the competences gained rather than number of days or hours and a package of combination of sea service and simulators could be envisaged;
- .8 reducing sea service for first certificates of competence should not be accepted; and
- .9 the use of simulators as a means of demonstrating competence at the support level is very limited and is not stated in column 3 for table A-II/4 or table A-III/5.

37 Following a lengthy discussion, the Group agreed to confirm the decision taken by the ISWG-STCW 1, i.e. 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 (document HTW 11/6, paragraph 38), noting that article IX of the Convention already permits individual Administrations to extend the use of simulators.

38 Therefore, the Group:

- .1 confirmed not to include these proposal in the list of gaps; and
- .2 noted that the use of simulators for the support level might be reevaluated after reviewing the tables of competences before making a decision on this matter.

Seafarer training on firefighting

39 The Group recalled that SSE 10 had invited interested Member States to consider the training of seafarers in fire-fighting for cargoes transported by containerships (document SSE 10/20, paragraph 10.40).

40 The Group, noting that the ISWG-STCW 1 had already agreed to review all competence requirements in the tables of part A of the Code to ensure they were adequate and reflected the duties and responsibilities of seafarers in relation to new technologies, confirmed not to include this proposal in the list of gaps.

Falls from height

41 The Group recalled that MSC 108 had instructed the Sub-Committee to consider the matter of falls from height under the comprehensive review of the Convention and Code (document MSC 108/20, paragraph 13.5).

42 The Group, noting that the ISWG-STCW 1 had already agreed that the STCW Code lacked competence in maintaining occupational health protection of seafarers on board ships (document HTW 11/6, annex 1, page 94), confirmed not to include this proposal in the list of gaps.

Training of personnel of non-tanker ships entering in enclosed spaces

43 The Group recalled that III 10 had invited the Sub-Committee to address inconsistencies in the training of personnel on non-tanker ships before entering enclosed spaces under the comprehensive review of the Convention and Code (document III 10/18, paragraphs 4.45.6 and 4.46.3).

44 The Group, noting that the ISWG-STCW 1 had already agreed that the minimum standard of competence in elementary first aid in table A-VI/1-3 did not include rescue knowledge of personnel in enclosed space (document HTW 11/6, annex 1, page 76), confirmed not to include this proposal in the list of gaps.

Finalization of phase 1 of the review

45 Finally, the Group agreed that there was no other remaining work left for phase 1 and completed the list of gaps, as revised, set out in annex 1, which marked the completion of phase 1 of the review, and recommended the commencement of phase 2.

WORK PLAN FOR THE REVIEW OF ALL THE PROVISIONS OF THE CONVENTION AND CODE (ToR 2)

46 After a lengthy discussion on the needs to conduct phase 2 and the resources available to undertake this task, the Group noted the following views expressed:

- .1 phase 2 should start with chapters 2 and 3, which are the backbone of the Convention and Code (noting that the word "chapter" refers to the chapter of the Convention including regulations and its corresponding parts of the Code);
- .2 the importance of the comprehensive review of the Convention and Code must be treated as priority by IMO, since it deals directly with seafarers; therefore, intersessional working groups should, in principle, be preferred to

intersessional correspondence groups, to undertake the considerable task of phase 2, as it was initially agreed by MSC 108 (document MSC 108/20, paragraph 18.20);

- .3 intersessional correspondence groups and virtual groups were not considered as the appropriate tools for phase 2, recalling that some previous intersessional correspondence groups spent too much time trying to clarify and confirm the work that was being done; additionally, delegations expressed concerns of work resources to participate in multiple simultaneous working groups, noting the intersessional correspondence groups proposed to be established on Alternative Fuels and Enhancement of the STCW Oversight System;
- .4 intersessional working groups should, in principle, take place every year until the finalization of the comprehensive review, to meet the deadlines agreed in the road map endorsed by MSC 108, and an intersessional working group should be convened between HTW 11 and HTW 12, noting that this was subject to approval by MSC with the endorsement by the Council, based on the evidence at the time of request at each session; and
- .5 if intersessional working groups could not be held every year, due to resources limitations of the Secretariat, this would inevitably delay the initial road map.

47 In the ensuing discussion, the Group agreed that:

- .1 now that phase 1 was finalized, no more submissions for additional gaps shall be accepted, bearing in mind that the list of gaps was already comprehensive, and accepting new gaps in the future would undermine efforts to go forward with phase 2 of the review;
- .2 due to resource limitations of the Secretariat affecting the capacity to hold an intersessional working group every year, consideration should be made to convene an intersessional working group back-to-back after HTW 12, and then once every other year, if deemed necessary (see also paragraph 50);
- .3 invitation should be made for submissions of proposals for draft amendments to chapters 2 and 3 for consideration at HTW 12, considering the time required by delegations to develop robust proposals and taking into account the need for a harmonized method of submissions;
- .4 noting the example of template set out in the annex to document HTW 10/6/2 (United Kingdom), the Secretariat might be requested to develop and circulate a template for submission of proposals for draft amendments, which should provide the following information:
 - .1 reference to the provisions concerned by the amendment;
 - .2 linkage with the gap identified in the list of gaps, as set out in annex 1;
 - .3 information whether the proposal is an addition of a new training requirement, a merge or a deletion, as appropriate; and

- .4 if the proposal aims at adding new training requirements, information on the cumulative impact of adding those new requirements to seafarer certifications and taxonomy (see paragraph 35); and
- .5 delegations whose proposals for amendments had been kept in abeyance from this and previous HTW sessions and its working groups should be invited to resubmit them for phase 2 at HTW 12, using the template (for example, documents HTW 11/6/8 to 11/6/18, 11/6/20 and 11/6/21 (India)).

48 In the light of the foregoing, the Group developed the work plan for phase 2, as set out in annex 2. The Group also agreed that the work plan was complementary to the road map set out in annex 3 (see paragraphs hereunder) and should be read together.

ROAD MAP AND ARRANGEMENTS FOR PHASE 2 OF THE COMPREHENSIVE REVIEW (ToR 3)

49 Following the considerations and outcome of discussions on ToR 2, the Group reviewed the road map contained in annex 6 to document HTW 10/10, and after further lengthy discussions, agreed on its update as set out in annex 3, bearing in mind that this road map was a live document which might need to be revised at future sessions, as appropriate.

50 The observer delegation of ICS, supported by several other delegations, expressed serious concerns about the revised road map, with the proposed timeline now extended to 2031, noting that this delay would cause major problems to the industry, such as the emerging of disparate standards and courses in the absence of updated international standards set by STCW. A faster completion of the review, as originally planned, should be considered.

51 Other delegations expressed concern with requests to compress the timeline for the comprehensive review. As this was a comprehensive review, there were a voluminous number of identified gaps for every chapter, and compression of the timeline would result in mistakes and a less effective final document.

52 Given the number of gaps identified in phase 1, the Group recognized that the volume of work required had grown significantly from what was initially envisaged and this would have an impact on the resources required to complete the work within the agreed time frame.

CUMULATIVE IMPACT IN THE CONTEXT OF UPDATING THE ROAD MAP AND ARRANGEMENTS FOR PHASE 2 (ToR 4)

53 The Group considered document HTW 11/6/25 (ICS), in relation to the cumulative impact of adding new training requirements to the Convention, and recalled that it had agreed to request inputs from submitters of draft amendments on the cumulative impact (paragraph 47.4.4).

54 In addition, one delegation expressed the need to assess the time required to complete maritime training curriculum once the comprehensive review was completed, with a view to ensuring that the time frame to complete training requirements were reasonable and practicable. However, some other views were expressed that:

- .1 there was currently no tool available to quantify the time needed to meet the current training standards; more notably, it was impossible to quantify yet the

new training standards that would result from the comprehensive review of the Convention; and

- .2 some training requirements would inevitably be removed or revisited which, in turn, would reduce the time needed for completing the training.

55 The Group, noting the impossibility to quantify at this stage the cumulative impact of adding new training requirements to the Convention, and what would be assessed, agreed to have, at each step of the road map, a consideration of the cumulative effect to ensure that this issue was carefully considered throughout phase 2 of the review.

DRAFT MSC RESOLUTION ON ACCESSIBILITY OF INFORMATION RELATED TO MEDICAL PROVISIONS IN THE STCW CONVENTION (ToR 5)

56 The Group reviewed and finalized the draft MSC resolution on accessibility of information related to medical provisions in the Convention, set out in annex 4, with a view to adoption by the Committee.

CORRESPONDENCE GROUP(S) ON THE COMPREHENSIVE REVIEW OF THE 1978 STCW CONVENTION AND CODE (ToR 6)

57 Recalling the discussion on how to organize phase 2 (revision) of the comprehensive review, the Group agreed that it would be more appropriate to initiate consideration of the amendments to chapters 2 and 3 at HTW 12. Accordingly, the Group recommended that invitation be extended for submissions of proposals for draft amendments to chapters 2 and 3 directly at HTW 12 for consideration.

CORRESPONDENCE GROUP ON THE STCW OVERSIGHT AND DRAFT TERMS OF REFERENCE (ToR 7)

58 Taking into account the progress made at this session, the Group recommended that the Correspondence Group on the STCW oversight and verification processes be established, and taking into account documents HTW 11/6/5 and HTW 11/6/28, as well as the relevant part of document HTW 11/6/3, be instructed to:

- .1 examine the strengths of each of the STCW oversight system and IMSAS systems, particularly their scope and interconnections, with a view to achieving complementarity integration for consistency;
- .2 consider the consolidation of the administration of the STCW oversight system and IMSAS system;
- .3 depending on the outcomes of the above-mentioned activities, prepare relevant amendments to the STCW Convention and Code, as well as identifying potential impact on the Framework and Procedures for the IMO Member State Audit Scheme (IMSAS), particularly with respect to the scope of IMSAS; and
- .4 submit a written report to HTW 12.

59 Additionally, the Group recommended that the Sub-Committee invite interested Member States and international organizations to nominate both Competent Persons and IMSAS auditors to actively participate in the Correspondence Group.

ACTION REQUESTED OF THE SUB-COMMITTEE

- 60 The Sub-Committee is invited to approve the report in general and, in particular, to:
- .1 agree to the list of gaps identified in the STCW Convention and Code, with a view to being addressed in phase 2 of the comprehensive review (paragraphs 5 to 45 and annex 1);
 - .2 endorse the agreement of the Group that phase 1 (review/identification of gaps) has been completed, and agree to the commencement of phase 2 of the comprehensive review (paragraph 45);
 - .3 note the agreements of the Group on how to organize phase 2 (revision) of the comprehensive review, and take necessary actions, as appropriate (paragraph 47);
 - .4 agree to the draft work plan for phase 2 and updated road map, to be read complementary of one another (paragraphs 48 and 49, and annexes 2 and 3);
 - .5 note the concerns expressed about the length of time necessary to complete phase 2 (paragraphs 50 to 52):
 - .1 expanded volume of work from what was initially planned and its impact on the length of time;
 - .2 the need for the Organization to prioritize the work;
 - .6 note the consideration of the Group of document HTW 11/6/25 on the cumulative impact in the context of updating the road map and arrangements for phase 2 of the comprehensive review (paragraphs 53 to 55);
 - .7 agree to the draft MSC resolution on Accessibility of information on seafarer medical certificates and medical practitioners recognized for the purpose of conducting seafarer medical examinations, set out in annex 4, with a view to adoption by the Committee (paragraph 56 and annex 4);
 - .8 note the view of the Group on the establishment of an intersessional correspondence group on the comprehensive review of the STCW Convention and Code, and invite submissions of proposals for draft amendments to chapters 2 and 3 directly at HTW 12 for consideration (paragraph 57); and
 - .9 approve the draft terms of reference for intersessional correspondence group on the STCW oversight and verification processes (paragraph 58).

ANNEX 1

LIST OF GAPS IDENTIFIED IN THE 1978 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

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

All competency tables in the STCW Code

<u>Gap areas in the Convention and Code</u>	<u>Gap description</u>	<u>Reference to documents and remarks</u>
<u>STCW Code</u>	<u>Consistency with regard to the use of action verb taxonomy should be ensured in all tables of part A of the STCW Code. to classify the requirements for seafarers into KUPs, methods for demonstrating competence, and criteria for evaluating competence, which should be in line with the taxonomy used in modern education system.</u>	<u>HTW 11/6/7</u>

Chapter I

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

<u>Gap areas in the Convention and Code</u>	<u>Gap description</u>	<u>Reference to documents and remarks</u>
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 cybersecurity, 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	New definitions, and clarifications to existing definitions may be necessary to address emerging technology and trends.	ISWG-STCW 1/2/16

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	<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>	
<p>Regulation I/1 paragraph 1</p>	<p>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.</p>	<p>ISWG-STCW 1/2/19</p>
<p>Regulation I/1</p>	<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>	<p>ISWG-STCW 1/2/25</p>
<p>Regulation I/1 Regulation I/1.15</p>	<p>Revision to align with other sections of the Convention and Code.</p>	<p>ISWG-STCW 1/2/46</p>
<p>Regulation I/1, paragraph 1.26</p>	<p>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.</p>	<p>ISWG-STCW 1/2/10</p>
<p>Regulation I/1, paragraph 1.45</p>	<p>Revision to define "original form" as an electronic form of any certificate.</p>	<p>ISWG-STCW 1/2/21</p>

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, sections A-I/2 and B-I/2	The interpretation and use of the term "endorsement", as set out throughout regulation I/2 of the STCW Convention and sections A-I/2 and B-I/2 of the STCW Code, is not consistent.	HTW 11/6/2
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

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
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	<p>According to the current regulation, if the endorsement expires or if it is withdrawn, suspended, or cancelled by the issuing Party, the 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>	ISWG-STCW 1/2/30
<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>	Propose to amend the Convention language to provide clarity/flexibility regarding the use of digital certificates.	ISWG-STCW 1/2/44
Regulation I/2, paragraph 13.3	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.	ISWG-STCW 1/2/16 Revise paragraph 13.3 to remove the requirement to

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
		qualify for medical certification prior to the issuance of a certificate of competency.
<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>
Regulation I/2, paragraph 16	The 1 January 2017 date has passed.	ISWG-STCW 1/2/16
Regulation I/2	<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</p>	ISWG-STCW 1/2/11

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	<p>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 professional competence at intervals not exceeding five years.</p> <ul style="list-style-type: none"> - 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>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> <ul style="list-style-type: none"> - 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. - 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. - 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. 	

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Section B-I/2	<p>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;</p>	<p>ISWG-STCW 1/2/25</p> <p>1 Conduct a comprehensive review of the types of certificates covered by the Convention;</p> <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 AVI/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</p>	<p>ISWG-STCW 1/2/11</p>

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	<p>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> <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>	

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	<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> <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</p>	ISWG-STCW 1/2/11

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	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.	
Section B-1/2	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
<u>Regulation I/4 paragraph 1</u>	<u>PSC inspections are limited to verifications and assessments which are identified in regulation I/4. However, a lack of familiarity of the seafarers on board with their specific duties and with all ship arrangements, installations, equipment, procedures and ship characteristics that are relevant to their routine or emergency duties is not, under this regulation, a deficiency that may pose a danger to persons, property or the environment, nor is the ability for the ship's complement to effectively coordinate their activities in an emergency situation and to have effective oral communication.</u>	<u>HTW 11/6/27</u>

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.	<p>ISWG-STCW 1/2/25</p> <p>Move the guidance about distance learning and e-learning in section BI/6 to the mandatory provisions in section A-I/6.</p>
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 time frame 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	<p>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.</p> <p>Noted Issues identified by CP Panels:</p> <ol style="list-style-type: none"> 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	<p>ISWG-STCW 1/2/25</p> <p>The scope of the independent evaluation may be set forth in a similar</p>

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	<p>1. Amending paragraphs 1, 3, 5 and 6 of regulation I/10 and section B-I/10;</p> <p>2 Revision of guidance MSC.1/Circ.1450; and</p> <p>3 Amending paragraph B-I/10.1 and transferring it to section B-I/2 of the STCW Code. For clarity.</p>	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	<p>Requires revision to remove regulation V/3 from the text.</p> <p>Requires the addition of a new paragraph to cover the IGF requirements separately and renumbering relevant existing paragraphs.</p>	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.	<p>ISWG-STCW 1/2/44</p> <p>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</p>

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
		professional 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

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
Regulation I/11, paragraph 5	1 January 2017 date has passed.	ISWG-STCW 1/2/16
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

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
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

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
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
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	Section is lacking performance standards and provisions for the use of modern simulation. There are currently no provisions for some types of simulators in common use today. Section lacks guidance for the use of modern simulation in seafarer training.	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	<p>The guidance in section B-VIII/1.8 proposes that companies consider the implementation of a policy of drug and alcohol abuse prevention.</p> <p>However, this guidance should be moved to the text of the STCW Convention in regulation I/14.</p>	ISWG-STCW 1/2/10
Regulations I/14.1	<p>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.</p> <p>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.</p> <p>The term appropriate certificate and the term "Radio Regulations" are not defined. Clarify the meaning of appropriate certificate or delete it.</p>	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-I/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>
<p>Simulation and Seagoing Service further consideration is needed, risk-based analysis</p>		
<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 Signalling (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 paragraph 5	Propose to remove paragraph 4 as it has not been applicable since 2012 Propose to remove paragraph 5 as it has not been applicable since 2017.	ISWG-STCW 1/2/44
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 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	<p>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".</p> <p>In addition, the term "approved" associated to the "workshop skills training" is not stated as it is for the "seagoing service".</p>	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.	<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		
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.	<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 (like previous decision)</p>

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>
<p>Competence and KUPs</p>		
<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 set-up, 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	<p>ISWG-STCW 1/2/44</p> <p>Propose to add approved training or an approved training programme as an additional method of demonstrating competence</p>
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.	<p>ISWG-STCW 1/2/44</p> <p>Remove duplication from started requirements for BT, PSC, AFF, Medical FA and MC.</p>
Table A-III/1, column 2	Existing requirements do not take into consideration the advancement in technology.	<p>ISWG-STCW 1/2/44</p> <p>Propose to revise the KUPs to address advances in technology.</p>
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
	<p>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.</p>	
<p>Section A-III/1, paragraph 10 (near-coastal voyages)</p>	<p>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.</p>	<p>ISWG-STCW 1/2/37 Deletion of the limitation of 3,000 kW</p>
<p>Section B-III/1</p>	<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>	<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</p>
<p>Section A-III/1</p>	<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>	<p>ISWG-STCW 1/2/11</p>
<p>Section A-III/1</p>	<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>	<p>ISWG-STCW 1/2/11</p>
<p>Section A-III/1</p>	<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>	<p>ISWG-STCW 1/2/11</p>

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 regard to specialized training is used consistently throughout the paragraph identified.</p>
Tables A-III/4 Table A-III/5 and A-III/7	<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 onboard 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	The lack of career progression for electro-technical officers (ETOs), by creating a senior electro-technical officers certification to address ETOs and enhance leadership and operational efficiency on board modern ships and within the electro-technical department.	HTW 11/6/19
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 regard 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 regard 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	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
	<p>A-III/6, paragraph 2 are applicable to every candidate.</p> <p>Additionally, sections B-II/1 and B-V/1 of the STCW Code provide guidance regarding the onboard training, whereas section B-III/6 lacks such guidance.</p>	
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." 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) 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>	ISWG-STCW 1/2/30
B-IV/2	<p>Amendment to training related to the General Operator's Certificate: 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	<ol style="list-style-type: none"> 1. In the documentation system related to GMDSS, it is more accurate to use term "recognized satellite system"; 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>ISWG-STCW 1/2/25</p> <ol style="list-style-type: none"> 1. Replace the phrase "satellite system" as used in paragraphs 4, 18 and 32 of section B-IV/2 with "recognized satellite system"; 2. Revise the footnote cited in paragraphs 26.9, 34.9 and 42.7.

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/1-1, Sections A-V/1-1, Tables A-V/1-1-1 and A-V/1-1-2, Section B-V/1	Training and qualification requirements for crude oil wash are not only based on the STCW Convention, but also on the Assembly resolution, originally adopted in 1979. It should be reviewed to what extent the resolution is still relevant and instruct the other IMO bodies accordingly. This is in line with the agreed principle that the Convention and Code remain the sole IMO instruments addressing standards for training and certification of seafarers. Additionally, it could be beneficial to combine all crude oil wash related training and qualification requirements into the STCW Convention and Code. That would address inconsistencies, duplications and different interpretations and also decrease the administrative burden.	HTW 11/6/1

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	<p>Provide an allowance for seagoing service to be fulfilled through approved simulator training on bunkering operations.</p> <p>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.</p>	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	<p>Reword as follows:</p> <p>"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."</p>	<p>ISWG-STCW 1/2/39</p> <p>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"</p>

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 1 July 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.	<p>ISWG-STCW 1/2/11</p> <p>If a CoP for chapter VI training does not have an expiry date, it should be clarified what is meant by 'every five years'.</p> <p>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.</p>
Regulation VI/1, paragraph 2	Revise to ensure clarity. (e.g. 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 in regulation VI/1.</p>
Regulation VI/1 Regulation VI/3 Regulation VI/4 Regulation VI/6	<p>Inconsistent use of terminology: "a course in ... training", "the course in ... training" or "a course of training in ...".</p> <p>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,</p>	<p>ISWG-STCW 1/2/11</p>

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>	
Regulation VI/1	Regulation VI/1 does not include a provision that the seafarer shall attend an approved training course while regulations VI/3, VI/4, VI/5 and VI/6 include a different wording.	HTW 11/6/1
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, cybersecurity, 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

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
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
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
<u>Sections A-VI/1.3, A-VI/1.4, A-VI/2.5, A-VI/2.6, A-VI/2.11, A-VI/3.5 and A-VI/3.6</u>	<u>Sections A-VI/1.4, A-VI/2.6 and A-VI/3.6 include the following text "Parties may accept onboard training and experience for maintaining the required standard of competence ...". However, this lacks clarity and instead it should be better to replace defined areas of approved refresher courses. Instead, it should be better to define standards for refresher courses including new developments. Sections A-VI/1.3, A-VI/2.5, A-VI/2.11 and A-VI/3.5 of the STCW Code provide that seafarers should every five years provide evidence of having maintained the required standards of competence. The refresher courses should also be approved by the Administration to ensure consistency and quality, as well as to continuously ensure new technologies and amendments are adequately addressed by training providers.</u>	<u>HTW 11/6/1</u>
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
<u>Section B-VI/4</u>	<u>There is no provision for guidance on update or refresher training for seafarers qualified in accordance with regulation VI/4.1 (medical first aid). It is therefore relevant to address whether the Code should provide for guidance on update or refresher training for seafarers qualified in accordance with section A-VI/4, paragraphs 1 to 3. This should include consideration of regulation I/11 in promoting the formulation of a structure of refresher and updating courses for which medical first aid should be included at an appropriate level. It should also consider the guidance noted in model course 1.14. and a review of the model course to take into account advances in methodology for training delivery and in medical standards. Medical treatment, use of medical equipment and best medical practice is subject to change due to ongoing advances in medical science for the benefit of all. Update training should be provided to those seafarers or persons who are required to be qualified in accordance with STCW regulation VI/4, and designated to apply immediate first aid in the event of an accident or illness on board.</u>	<u>HTW 11/6/1</u>

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)	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

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	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. 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. Table A-II/1 or A-III/1 specified for second time may be deleted.	ISWG-STCW 1/2/41
Regulations VII/1, VII/2 and VII/3 Sections A-VII/1 and A-VII/2 Sections B-VII/1, B-VII/2 and B-VII/3	Review the suitability of non-maritime graduates to enter the maritime workforce and enhancing the possibilities for alternative certification. The requirements of the maritime industry for certain shipboard positions can be partly met by graduates of non-maritime establishments and persons from shore-based industries. To attract and retain such persons, instead of maritime administrations granting exemptions under various STCW regulations, consideration should be given to whether and how the guidelines established under STCW could provide a more specific framework for assessing their training needs commensurate with the role on board.	HTW 11/6/26

**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</p>	ISWG-STCW 1/2/11

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	<p>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>	
	<p>Paragraph 2 currently appears to be leading to interpretation issues and may be further clarified.</p> <p>Consider inclusion of table(s)/flow chart(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 standby.	ISWG-STCW 1/2/25
<u>Regulation VIII/2</u> <u>Sections A-VIII/2 and B-VIII/2</u>	<u>The current provisions are rather detailed and prescriptive in nature and may not offer sufficient room for innovations with regard to shipboard technologies and operations (such as automation).</u>	<u>HTW 11/6/26</u>
<u>Regulation VIII/2</u>	<u>Noting the outcome of analysis of six consolidated audit summary reports (CASRs), regulation VIII/2 should be reviewed to ensure those provisions remain appropriate and effective.</u>	<u>MSC 109/WP.1/Rev. 422, paragraph 15.11</u>
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	ISWG-STCW 1/2/25

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	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.	
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 learned. (e.g. modern navigational tools, weather routeing, integrated systems, etc.)	ISWG/STCW 1/2/16 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

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
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 it necessary, a continuous navigational watch shall be maintained at anchor." the meaning of the word "necessary" is unclear.</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 frequency of compass determination</p> <p>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.</p>
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	<p>The Code, at present, stipulates only the following:</p> <p>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 subparagraph 2, section A-VIII/2, part 1, paragraphs 1 and 2 – Certification</p>	ISWG/STCW 1/2/42
Section A-VIII/2, part 2, paragraphs 3 and 4 - Voyage Planning – General requirements	<p>The Code, at present, stipulates only the following:</p> <p>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,</p>	ISWG/STCW 1/2/42

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
	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.	
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 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'	ISWG/STCW 1/2/42
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

Gap areas in the Convention and Code	Gap description	Reference to documents and remarks
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
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 programme 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 well-being' 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 well-being' 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 well-being' 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 well-being".	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
CYBERSECURITY

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, cybersecurity 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 cybersecurity for electro-technical officers at the operational level. Therefore, it is necessary to enhance the requirements for cybersecurity 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 cybersecurity 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 cybersecurity 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 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
	<p>Table A-II/2 should be revised to cover cybersecurity considerations, best practices and the Human Element, including Data Science skills.</p> <p>Table A-III/2 should be revised to include cybersecurity considerations, best practices, the Human Element and Data Science skills</p>	
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 cybersecurity 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 Cybersecurity.	<p>ISWG-STCW 1/2/16</p> <p>Develop competences in tables A-VI/5, A-VI/6-1 and A-VI/6-2 to address maritime cybersecurity.</p>

ANNEX 2

DRAFT WORK PLAN¹ FOR PHASE 2 OF THE COMPREHENSIVE REVIEW

Stepped approach work plan

Note: A template will be developed and made available for use for all submissions. The template will include requirements to link proposals to agreed gaps and consideration of cumulative impacts.

Step 1: Intersessional work reporting to HTW 12 (2025)

Chapter 1, on the enhancement of the communication of information provisions related to the oversight and verification processes (regulations I/7, I/8 and I/16 with STCW experts and IMSAS experts).

Step 2: HTW 12 (2026) (simultaneous work streams):

- 1 **Chapter 1**, limited to provisions on oversight.
- 2 **Chapter 2**, existing provisions, and including new provisions for:
 - .1 Violence and harassment, including sexual harassment, bullying and sexual assault (HTW 11/11, annex [...], appendix 10);
 - .2 Mental health, psychological safety, and gender and cultural diversity (HTW 11/11, annex [...], appendix 11);
 - .3 Cybersecurity (HTW 11/11, annex [...], appendix 13); and
 - .4 Ballast water management (HTW 11/11, annex [...], appendix 12).
- 3 **Chapter 3**, existing provisions, and including new provisions for:
 - .1 Violence and harassment, including sexual harassment, bullying and sexual assault (HTW 11/11, annex [...], appendix 10);
 - .2 Mental health, psychological safety, and gender and cultural diversity (HTW 11/11, annex [...], appendix 11);
 - .3 Cybersecurity (HTW 11/11, annex [...], appendix 13); and
 - .4 Ballast water management (HTW 11/11, annex [...], appendix 12).

Step 3: Intersessional work reporting to HTW 13 (2026)

Continuation of chapters [1,] 2 and 3 by correspondence to be reported to HTW 13.

¹ This work plan should be read in conjunction with the road map set out in annex 3.

Step 4: HTW 13 (2027) (simultaneous work streams, which may include intersessional CG)

- 1 Finalize chapters 2 and 3², as well as chapter 1 for oversight.
- 2 Setting up intersessional arrangements, inviting the submissions to HTW 14 on the draft amendments to chapters 4 and 6, as well as the rest of chapter 1, including requirements for regulation I/8 on quality standards systems.

Step 5: HTW 14 (2028) (simultaneous work streams)

Prepare draft amendments to chapters 4 and 6, as well as the rest of chapter 1, as follows:

- 1 **Chapter 4.**
- 2 **Chapter 6**, existing provisions, and including new provisions for:
 - .1 Violence and harassment, including sexual harassment, bullying and sexual assault (HTW 11/11, annex [...], appendix 10);
 - .2 Mental health, psychological safety, and gender and cultural diversity (HTW 11/11, annex [...], appendix 11);
 - .3 Cybersecurity (HTW 11/11, annex [...], appendix 13); and
- 3 **Chapter 1:** the rest of the chapter other than those already undertaken.

Develop a plan for the revision of model courses.

Step 6: Intersessional work reporting to HTW 15 (2028)

Continuation of chapters 1, 4 and 6 by correspondence to be reported to HTW 15.

Step 7: HTW 15 (2029) (simultaneous work streams, which may include intersessional CG)

- 1 Finalize chapters 1, 4 and 6, and chapter 1, in principle.³
- 2 Setting up intersessional arrangements, inviting the submissions to HTW 16 on the draft amendments to chapters 7 and 8, as well as chapter 5 ([with possible exception of the IGF-related provisions⁴]).

Step 8: HTW 16 (2030)

Prepare draft amendments to chapters 5, 7 and 8

² Chapters 2 and 3 are subject to final review taking into account the environmentally-related issues.

³ Chapter 1 is subject to final review taking into account the need for consequential amendments.

⁴ The arrangements for the conduct of revision of chapter 5 on existing requirements and/or new requirements on the IGF-related provisions will be decided by the Sub-Committee at a future stage, taking into account the progress made under agenda item 7.

Step 9: Intersessional work reporting to HTW 17 (2030)

Continuation of amendments to chapters 5, 7 and 8.

Step 10: HTW 17 (2031)

Finalize the revision of the Convention and Code, including chapters 5, 7 and 8.

ANNEX 3

**DRAFT UPDATED ROAD MAP¹ FOR
THE COMPREHENSIVE REVIEW OF THE 1978 STCW CONVENTION AND CODE²**

Session	Action
Phase 1	
HTW 11 (spring 2025)	<ul style="list-style-type: none"> - Consideration of the report of ISWG-STCW 1. - Consideration of new gap submissions to HTW 11. - Finalization of a list of identified gaps. - Arrangements for the commencement of phase 2 (revision of the Convention and Code), including the establishment of a stepped approach to prepare amendments. - Invite proposals for revision of the Convention and Code (chapters 2 and 3) to HTW 12, in accordance with the stepped approach. - Update the road map in accordance with the progress made during the session. - Report of HTW 11 to MSC 110, seeking approval for the establishment of ISWG-STCW 2 immediately following HTW 12.
MSC 110 (summer 2025)	<ul style="list-style-type: none"> - Consideration of the report of HTW 11. - Endorse the finalization of phase 1 and the road map for phase 2. - Approval of convening of ISWG 2 (immediately following HTW 12), subject to endorsement by the Council.
Phase 2	
Intersessional Correspondence Group (CG)	<ul style="list-style-type: none"> - Consideration of chapter 1 on oversight system. - Report of Intersessional Correspondence Group to HTW 12.

¹ This road map should be read in conjunction with the work plan set out in annex [2].

² Referred to as the "Convention and Code" hereafter.

<p>HTW 12 (spring 2026)</p>	<ul style="list-style-type: none"> - Consideration of: <ul style="list-style-type: none"> .1 report of CG on chapter 1 on oversight system; and .2 proposals for amendments to chapters 2 and 3 - Consideration of the convening of Intersessional Correspondence Group(s) (with virtual support) and agree to their ToR. - Report of HTW 12 to MSC 111.
<p>ISWG 2 (immediately after HTW 12)</p>	<ul style="list-style-type: none"> - Continuation of the draft amendments to chapters 1, 2 and 3, as appropriate - Consideration of cumulative impact of new requirements - Update the road map in accordance with the progress made during the session. - Report of HTW 12 WG and ISWG 2 to HTW 13.
<p>Intersessional Correspondence Groups</p>	<ul style="list-style-type: none"> - Continuation of the draft amendments to chapters 1, 2 and 3 by correspondence to be reported to HTW 13, if needed. - Report of Correspondence Groups to HTW 13.
<p>MSC 111 (summer 2026)</p>	<ul style="list-style-type: none"> - Consideration of the report of HTW 12.
<p>HTW 13 (spring 2027)</p>	<ul style="list-style-type: none"> - Finalization of amendments on chapters 1 (oversight system), 2 and 3. - [Consideration of the convening of Intersessional Correspondence Groups (with virtual support) and agree to their ToR, if required.] - Invite proposals for revision of the Convention and Code (chapters 4 and 6) at HTW 14, in accordance with the stepped approach. - Update the road map in accordance with the progress made during the session - Report of HTW 13 to MSC 113, seeking approval for the establishment of ISWG-STCW 3 right after HTW 14.
<p>MSC 113 (summer 2027)</p>	<ul style="list-style-type: none"> - Consideration of the report of the HTW 13. - Endorse the updates to road map in accordance with the progress made during the session. - Approval of convening of ISWG 3 (immediately after HTW 14), subject to endorsement by the Council.

<p>HTW 14 (spring 2028)</p>	<ul style="list-style-type: none"> - Prepare draft amendments to chapters 4 and 6, as well as the rest of chapter 1. - [Consideration of the convening of Intersessional Correspondence Group and agree to the ToR.] - Develop a plan for the revision of model courses. - Report of HTW 14 to MSC 114.
<p>ISWG 3 (immediately after HTW 14, if required)</p>	<ul style="list-style-type: none"> - Continuation of draft amendments to chapters 4 and 6, as well as the rest of chapter 1. - Consideration of cumulative impact of new requirements. - Update the road map in accordance with the progress made during the session. - Report of HTW 14 WG and ISWG 3 to HTW 15.
<p>MSC 114 (summer 2028)</p>	<ul style="list-style-type: none"> - Consideration of the report of the HTW 14.
<p>HTW 15 (spring 2029)</p>	<ul style="list-style-type: none"> - Finalization of amendments to chapters 1, 4 and 6. - Invite proposals for revision of the Convention and Code chapters 5, 7 and 8 to HTW 16, in accordance with the stepped approach. - [Consideration of the convening of Intersessional Working Group(s) and agree to the ToR.] - Update the road map in accordance with the progress made during the session. - Report to MSC 116, seeking approval for the establishment of ISWG-STCW 4 right after HTW 16.
<p>MSC 116 (summer 2029)</p>	<ul style="list-style-type: none"> - Consideration of the report of HTW 15. - Approval of convening of ISWG 4 (immediately after HTW 16), subject to endorsement by the Council.
<p>HTW 16 (spring 2030)</p>	<ul style="list-style-type: none"> - Consideration of draft amendments to chapters 5, 7 and 8. - Report to MSC 117.
<p>ISWG 4 (immediately after HTW 16, if required)</p>	<ul style="list-style-type: none"> - Continuation of the revision chapters 5, 7 and 8. - Consideration of cumulative impacts of new requirements. - Update the road map in accordance with the progress made during the session.

	<ul style="list-style-type: none">- Report of HTW 16 WGs and ISWG 4 to HTW 17.
MSC 117 (summer 2030)	<ul style="list-style-type: none">- Consideration of the report of the HTW 16.
HTW 17 (spring 2031)	<ul style="list-style-type: none">- Finalization of the revision of the Convention and Code, including chapters 5, 7 and 8.- Development of check/monitoring sheet (reference MSC.1/Circ.1587).- Report to MSC 119 for approval.
MSC 119 (summer 2031)	<ul style="list-style-type: none">- Approval of the draft text of amendments to the Convention and Code in accordance with the procedures set out in the Convention.
Meeting to adopt the revision (2031 or 2032)	<ul style="list-style-type: none">- Adoption of the draft amendments to the Convention and Code, and the associated draft resolutions.

ANNEX 4

DRAFT MSC RESOLUTION

**ACCESSIBILITY OF INFORMATION ON
SEAFARER MEDICAL CERTIFICATES AND MEDICAL PRACTITIONERS
RECOGNIZED FOR THE PURPOSE OF CONDUCTING
SEAFARER MEDICAL EXAMINATIONS**

THE MARITIME SAFETY COMMITTEE,

RECALLING Articles 28(a) and 28(b) of the Convention on the International Maritime Organization with respect to the functions of the Maritime Safety Committee,

RECOGNIZING that regulation I/9 of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978 ("the 1978 STCW Convention") requires seafarers serving at sea to hold a valid medical certificate that complies with the medical standards described in section A-I/9 of the Seafarers' Training, Certification and Watchkeeping Code (STCW) Code.

BEARING IN MIND that article VI of the 1978 STCW Convention ("Certificates", paragraph 1) requires that certificates for masters, officers or ratings shall be issued to those candidates who, to the satisfaction of the Administration, meet the requirements for medical fitness, in accordance with the relevant provisions of the 1978 STCW Convention and Code,

TAKING into consideration regulation I/9.2 of the 1978 STCW Convention which requires that each Party shall ensure that those responsible for assessing the medical fitness of seafarers are medical practitioners recognized by the Party for the purpose of seafarer medical examinations,

RECALLING regulation I/9.6 of the 1978 STCW Convention, which states that, if the period of validity of a medical certificate expires in the course of a voyage, then the medical certificate shall continue in force until the next port of call where a medical practitioner recognized by the Party is available, provided that the period shall not exceed three months,

CONSIDERING that Parties may need access to information on recognized medical practitioners in specific ports,

1 DETERMINES that, in accordance with regulation I/14.1.1, requiring companies ensure that seafarers assigned to their ships hold appropriate certification in accordance with the provisions of the 1978 STCW Convention and as established by Administrations; and in accordance with regulation I/14.1.4, requiring companies- ensure that documentation and data relevant to medical fitness of seafarers is maintained and readily accessible, therefore, companies must have a means to verify the validity of a seafarer's medical certificate;

2 INVITES Parties to recall that section A-I/9, paragraph 4 of the STCW Code requires the maintenance of a register of recognized medical practitioners that shall be made available upon request, and encourages parties to] consider publishing the information through the official websites of authorized government organizations. This information should be available in English;

3 ALSO INVITES Parties to note the necessity of providing prompt verification of the validity of seafarer medical certificates on the official websites of authorized government organizations and shall be available in English;

4 REQUESTS the Secretary-General to consider encouraging Parties on a voluntary basis to provide information on the official websites of authorized government organizations where Parties can verify the validity of seafarer medical certificates and to provide access to their register of recognized medical practitioners in English through the Global Integrated Shipping Information System (GISIS) portal.
