
STCW 95 – The Need for Internationally Recognised Certification for Crew on Vessels less than 500gt

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SYNOPSIS

We operate in a global market so why is there no internationally recognised certification for smaller commercial vessels of less than 500gt within current STCW regulations? The first internationally accepted certificate of competency enabling someone to take full command of a vessel only applies to vessels over 500gt.

Despite the STCW convention aim to ensure ‘uniform international maritime training standards’, the challenges facing operators of smaller vessels continue to pose a problem, with acceptance of certification varying from country to country. Is it time for STCW to recognise the scope of smaller vessels, including tugs and workboats, within the regulations? What can we do to facilitate this?

INTRODUCTION

NB: Although terminology is different from one country to another for describing vessels under 500gt, for the purposes of this paper, I will refer to them as Small Commercial Vessels (SCVs), which includes tugs and workboats. Unless otherwise specified, when referring to certification it is in the context of manning and not vessel specific.

This paper has been written as a result of the frustrating experiences of a growing number of tug and workboat owners and operators who face problems operating outside their flag state simply because, within current STCW (Standards of Training, Certification & Watchkeeping) guidelines there is no internationally recognised standard for training and certification on vessels of less than 500gt. Current STCW Certificates of Competency for vessels less than 500gt can be issued with ‘near coastal’ limitations, but there is inconsistency between countries as to the definition and limits of what is ‘near coastal’.

In addition, acceptance of these certificates is at the discretion of administrations and Port State authorities, which creates obvious problems. I am representing the members of the National Workboat Association of the UK (NWA) and in particular Maritime Craft Services (Clyde) Ltd who collectively and individually operate a fleet of tugs and workboats.

The aim of this paper is to bring an awareness of the situation and experiences of UK operators to an international audience, not only to other owners and operators but to ship builders, designers, manufacturers and contractors. In the course of my research it has become apparent that there are similar experiences and opinions from other countries but no central forum to discuss this outside of official IMO

(International Maritime Organization) channels. By collectively sharing experiences, ideas and possible solutions, maybe we can find a way to make our views known to those who can take them forward to the policy makers at IMO and STCW.

I firmly believe that it is in the interests of everyone in the industry to ensure that we have a common set of regulations in place that can take us forward with greater certainty. Whilst the need for internationally recognised training and certification standards may not be important to the operation of a ship in domestic trade and operating ‘near coastal’, it does create barriers to trade for those operating internationally.

The benefits of having internationally agreed common standards for vessels means that any vessel can freely operate in any country with the knowledge that safety standards have been addressed and that Port State officials will recognise and accept them. Why then should this be different for training and certification standards?

SCOPE OF WORK

It is a testament to tug and workboat designers, manufacturers and ship builders worldwide that the size, design and capabilities of the vessels on the market today have been instrumental in the growth of an industry that has enabled many owners and operators within it to become truly international players. This has meant a rapid increase over the past 10 years or so of small commercial vessels regularly operating worldwide on a variety of specialised projects, carrying out a variety of tasks. The area of operation is almost always ‘near coastal’, but this definition in itself adds to the problem, as it is open to interpretation and differs from country to country and is not always recognised between countries. I will discuss ‘near coastal’ in more detail later in the paper.

Projects can include:

- Oil and gas pipelines;
- Offshore wind farms;
- Land reclamation and dredging projects;
- Harbour and ports construction.

Tasks can include:

- Coastal towage;
- Harbour towage;
- Anchor-handling;
- Dredging support and other support roles in a variety of marine construction works.

Vessels can include:

- Tugs;
- Barges;
- Salvage vessels;
- Support vessels;
- Anchor-handling vessels;
- Coastal crew vessels.

However, whilst the vessels themselves have become more sophisticated and their capabilities more advanced, commercial barriers are encountered by the inability of STCW regulations to provide a common standard.

THE DIFFERENCES

SCVs of less than 500gt that have been designed for specific types of work should not be treated in the same way as ocean going-ships. The differences are vast, and this needs to be recognised in applying training and certification standards as far as safety, commercial viability and personal development are concerned. Differences include:

1. The vessels don't 'go to sea' for long periods of time, they move primarily from one contract to another to perform specific tasks for required periods of time. When leaving one contract for another they can either be transported by larger vessels or make trips within near coastal limits.
2. The work carried out on these vessels is practical and requires a high level of skill. Therefore it is essential to have crews with the necessary specialised competency training in relevant boat-handling skills.
3. Engine rooms are smaller, lack workshop facilities and require only basic engineering support from crew to cover daily maintenance tasks. The area of operation means that a vessel is within close proximity to a port or operating from a fixed base, allowing major engineering works and repairs to be met by shore side support.
4. There is limited living accommodation and storage facilities, crew numbers are smaller and able to multi-task. Spares and provisions can be regularly provided from shore-side suppliers.

5. The area of operation is usually 'near coastal', but the definition of this leaves too much to interpretation within STCW and creates problems for operators due to the many different definitions between countries. This is further discussed later.

SCVs that carry out specialised operations cannot therefore be compared to larger ocean-going ships and the requirements under STCW can prove problematic when applied to them.

THE PEOPLE

There are many differences in both the area of operation and the type of work carried out by SCVs, and so they attract many different people to the job, mainly because of the practical nature of the work. Historically, crew including the captain or master tend to have come straight from school with few, if any, academic qualifications. They are, however, practical people and learn on the job. The type of work carried out is very practical, hands-on and requires a high degree of skill. This is recognised in the career progression commonly adopted, with a captain or a master being required to work his way through the ranks, from the deck up. In direct contrast to merchant seamen who start their career at officer level, a person on an SCV will develop skills, practical competency training and experience over a period of time, before taking on what would be the equivalent of an 'officer' position on a larger ship.

Being a master or captain of an SCV is perhaps not quite as glamorous as being the master of a large passenger ship or hold the kudos that any master of a large ocean-going ship may have, but this is reflected in the remuneration both for owners and employees in the industry. A master or captain of a workboat is required to be very 'hands-on' in a practical and skilful way in addition to offering managerial support to a small crew, whereas a master of a large ocean-going ship carries a huge managerial responsibility for a large crew and possibly passengers, but has a clearly defined role and academic pathway. In contrast to larger ocean going ships, the area of operation and the range of tasks undertaken by SCV's, tends to attract the type of person who is interested in the practical nature of the work. There is no doubt that in addition to the practical element and skills involved, it is also essential that there needs to be a level of theoretical knowledge, covering the appropriate elements of Part A of STCW that can be relevantly attributed to SCVs. Many countries already have an appropriate training programme in place designed for SCVs. However, these are not standardised or recognised within STCW.

CURRENT STCW SITUATION

The current premise within STCW is that vessels less than 500gt need to meet the requirements for larger vessels when working outside near coastal limits.

Regulation 11/3 states:

'Every officer in charge of a navigational watch serving on a seagoing ship of less than 500 gross tonnage

not engaged in near coastal voyages shall hold an appropriate certificate for ships of 500 gross tonnage or more'.

This shows no understanding of the function of many SCVs, the specific skills required and the normal operating arrangements adopted. It also creates confusion with applying the 'near coastal' definition which has no consistency between countries.

'Near coastal voyage'

Within the regulations, STCW allows a country to define the definition of 'near coastal' within the principles laid out in Regulation 1/3 and communicate that to the Secretary General in conformity with the requirements of regulation 1/7 (communication of information). The definition can vary from country to country and create inconsistencies and problems with recognition of Certificates of Competencies by other administrations and Port State Control.

Paragraphs 2 of Regulation 1/3 states that a country: *'shall not impose training, experience or certification requirements on the seafarers serving on board ships entitled to fly the flag of another Party and engaged on such voyages in a manner resulting in more stringent requirements for such seafarers than for seafarers serving on board ships entitled to fly its own flag.'*

In respect of vessels regularly engaged in near coastal voyages off the coast of another party Paragraph 3 of Regulation 1/3 states: *'the Party whose flag the ship is entitled to fly shall prescribe training, experience and certification requirements for seafarers serving on such ships at least equal to those of the party off whose coast the ship is engaged,'*

In summary, this basically means that 'near coastal' applies only to the flag issuing the limitation unless an agreement has been reached between countries and certification requirements checked against a country's own. Unless common principles in the definition of 'near coastal' are used, the problems some vessels encounter when operating outside their own countries will persist.

Additionally, Resolution 8 of STCW advocates the *'Promotion of technical Knowledge, Skills and Professionalism of Seafarers'*. This statement should allow these principles to be applied to SCVs and not serve to create barriers.

CONCLUSION

I have written this paper in the hope that it can highlight the problems. It is not designed to be treated as the definitive way forward, but to open up dialogue and create some discussion. Hopefully this will bring some positive progress to a problem that is likely to increase as all sectors of the industry grow from strength to strength.

In the UK, we have spent many years trying to deal with the problem of certification and finding suitable ways to allow UK-flagged SCVs to successfully operate internationally. Our own administration at the MCA (Maritime & Coastguard Agency) have been very supportive, but this is only at a local level and resources are limited. Within the complex and bureaucratic framework of IMO it is very difficult for issues to be addressed and some administrations are more approachable and proactive with the SCV sector than others. Support at an international level can only be achieved through our individual administrations, who represent the sectors of the industry we are all involved in. As this is where the expertise and knowledge lies, this surely is where the motivating force should originate, to ensure that a common standard is in place that is relevant and appropriate and ensures safety as well as opportunity and equality for all.

Perhaps a starting point would be to consider the following:

1. Recognition that the SCV, be it a tug or a workboat, is different to a large ocean-going ship and as such should be treated differently, by acknowledging the area of operation, the skills required, the practical nature of the work and the people and the roles required to safely operate them;
2. Recognition that there are SCVs that operate internationally and that this is likely to increase;
3. Acknowledgement that a common set of standards will ensure safety and equal requirements applied to all.

In conclusion I question whether the ability to operate freely within a set of common guidelines is too much to ask and wonder where we go from here?

I would welcome any feedback on experiences encountered either by individuals, companies or countries and any opinions, comments or suggestions anyone may have.

