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PROPOSAL

From:	Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director
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To:	Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

No. Cion doc.:	SWD(2024) 256 final
Subject:	COMMISSION STAFF WORKING DOCUMENT Union submission to the International Maritime Organization's 11th session of the Sub-Committee on Human Element, Training and Watchkeeping proposing interim guidelines on training for seafarers on ships using new technologies and alternative fuels

Delegations will find attached document SWD(2024) 256 final.

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COMMISSION STAFF WORKING DOCUMENT

Union submission to the International Maritime Organization's 11th session of the Sub-Committee on Human Element, Training and Watchkeeping proposing interim guidelines on training for seafarers on ships using new technologies and alternative fuels

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PURPOSE

This Staff Working Document contains a draft Union submission to the International Maritime Organization's (IMO) 11th session of the Sub-Committee on Human Element, Training and Watchkeeping (HTW 11). The IMO has indicatively scheduled HTW 11 from 10 to 14 February 2025.

The draft submission proposes to develop and adopt interim guidelines on training for seafarers, regardless of their function, on ships using new technologies and alternative fuels. The interim guidelines will cover all the alternative fuels and related new technologies, without creating specific training provisions for each fuel.

EU COMPETENCE

The training and certification of seafarers is regulated at international level by the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978 (STCW Convention) of the International Maritime Organization (IMO), which was subject to a major revision at a Conference of Parties to the STCW Convention held in Manila in 2010 (Manila amendments). Further amendments to the STCW Convention were adopted in 2015 and in 2016.

Directive (EU) 2022/993¹ on the minimum level of training of seafarers incorporates the STCW Convention into Union law. It requires Member States to ensure that seafarers are trained as a minimum in accordance with the requirements of the STCW Convention as laid down in Annex I to the Directive (Article 3 of Directive (EU) 2022/993), including, where appropriate, the applicable provisions of the STCW Code (Article 1(21) of Directive (EU) 2022/993).

In light of all of the above, the present draft Union submission falls under EU exclusive competence, pursuant to article 3(2) TFEU as the interim guidelines, which, after finalised will be incorporated in the STCW Convention and Code, risk affecting or altering Union legislation and in particular Directive (EU) 2022/993.² This Staff Working Document is presented to establish an EU position on the matter and to transmit the document to the IMO prior to the required deadline of 6 December 2024.

¹ OJ L 169, 27.6.2022, p. 45.

² An EU position under Article 218(9) TFEU is to be established in due time should the IMO Maritime Safety Committee eventually be called upon to adopt an act having legal effects as regards the subject matter of the said draft Union submission. The concept of '*acts having legal effects*' includes acts that have legal effects by virtue of the rules of international law governing the body in question. It also includes instruments that do not have a binding effect under international law, but that are '*capable of decisively influencing the content of the legislation adopted by the EU legislature*' (Case C-399/12 Germany v Council (OIV), ECLI:EU:C:2014:2258, paragraphs 61-64). The present submission, however, does not produce legal effects and thus the procedure for Article 218(9) TFEU is not applied.

**DEVELOPMENT OF A SAFETY REGULATORY FRAMEWORK TO SUPPORT THE
REDUCTION OF GHG EMISSIONS FROM SHIPS USING NEW TECHNOLOGIES AND
ALTERNATIVE FUELS**

**Interim guidelines on training for seafarers on ships using new technologies and
alternative fuels**

**Submitted by Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia,
Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania,
Luxembourg, Malta, Netherlands (Kingdom of the), Poland, Portugal, Romania,
Slovakia, Slovenia, Spain, Sweden and the European Commission, acting jointly in the
interest of the European Union**

SUMMARY

Executive summary: The co-sponsors propose to develop and adopt interim guidelines on training for seafarers, regardless of their function, on ships using new technologies and alternative fuels. The interim guidelines will cover all the alternative fuels and related new technologies, without creating specific training provisions for each fuel.

Strategic direction, if applicable: 3

Output: 3.8

Action to be taken: Paragraph 12

Related documents: HTW 10/10, MSC 107/20, MSC 108/20

Background

1 The Maritime Safety Committee, at its 107th session, agreed to include in its biennial agenda for 2024-2025 a continuous output on "Development of a safety regulatory framework to support the reduction of GHG emissions from ships using new technologies and alternative fuels", assigning the Committee as the coordinating organ, in association with the CCC, HTW, III, SSE and SDC Sub-Committees as and when requested by the Committee and invited MEPC to consider being an associated organ (MSC 107/20, paragraph 17.6).

2 During the 10th session of the Sub-Committee on Human Element, Training and Watchkeeping (HTW 10), it was agreed that this output could be utilized to develop training provisions for seafarers on ships using alternative fuels, taking into account the ongoing work by MSC, the CCC Sub-Committee and any other relevant bodies (HTW 10/10, paragraph 6.32).

3 The Maritime Safety Committee, at its 108th session, endorsed the agreement by the HTW Sub-Committee to proceed with the development of training provisions for seafarers on ships using alternative fuels (MSC 108/20, paragraph 5.4).

Discussion

4 Seafarers are already required to work on ships using new technologies and alternative fuels; however, there has not been any consistent development of guidance or training provisions. Seafarers should be adequately trained and prepared to prevent and act in case of incidents, in order to safely handle these new fuels and engines.

5 The co-sponsors see merit in firstly addressing the urgent needs of training with interim guidelines for seafarers on ships using new technologies and alternative fuels. The interim guidelines will cover all the alternative fuels and related technologies, including any new that is being developed and used in the future.

6 The CCC Sub-Committee and the Maritime Safety Committee have already developed interim guidelines on several alternative fuels, such as methyl/ethyl, ammonia and hydrogen. The co-sponsors have considered the possibility to develop separate interim training guidelines for each alternative fuel. However, they consider that, at this point, this would result in additional time upon adoption and entry into force of those separate training provisions, as well as training fragmentation and possible limitations of the alternative fuel's market.

7 Any specific interim guidance or training provision would need to have a corresponding Model Course. In turn, the training and education institutions should develop programmes on the separate training provisions for each alternative fuel (existing or future). This will require significant amount of time and expertise, and will result in a fragmentation of the provided training. There is also a risk that an alternative fuel that seems to be used consistently now, it might be rendered unused in the future.

8 Therefore, the co-sponsors consider that, at first, generic interim guidelines on training for seafarers, regardless of their function, on ships using new technologies and alternative fuels, should be developed and adopted. The proposed text of the interim guidelines can be found in the Annex of this submission.

9 The interim guidelines are separated in general and specific training. The general training should include ship and equipment familiarization, a general understanding of the alternative fuels, such as its toxicity, and of the routine operations using the alternative fuels (bunkering). However, because every alternative fuel is different, the seafarers responsible for designated safety duties associated with the care, use or in emergency response working on ships using new technologies and alternative fuels should receive a training specifically designed on the alternative fuel(s) used in the ship. The proposal in the Annex provides specific minimum knowledge, understanding and proficiency areas that those seafarers should be trained on.

10 Following the successful completion of the training based on these interim guidelines, documentary evidence should be issued to attest its completion.

11 The co-sponsors do not exclude that in the future there might be a need to develop a more detailed interim guidance for each alternative fuel; however, any decision taken on this topic should be dealt with caution and taking into consideration the fragmentation of knowledge and training. The interim guidelines could in the future be incorporated in the STCW Convention and Code.

Action requested of the Sub-Committee

12 The Sub-Committee is invited to consider the information provided in the document and the annex and take action, as appropriate.

ANNEX

INTERIM GUIDELINES ON TRAINING FOR SEAFARERS ON SHIPS USING NEW TECHNOLOGIES AND ALTERNATIVE FUELS

1 Introduction

1.1 The purpose of these Interim Guidelines is to provide an international standard for the development and approval of training for seafarers on ships using new technologies and alternative fuels.

1.2 The basic philosophy of these Interim Guidelines is to provide general provisions and knowledge, understanding and proficiency areas (KUPs) to be addressed, as a minimum, when developing and approving the training of seafarers, including training courses, drills and emergency exercises, on ships using new technologies and alternative fuels. The goal is to ensure a sound, safe and environmental operation of those ships minimizing the risk to its crew, the ship, and the environment, having regard to the nature of the fuels involved.

1.3 These Interim Guidelines follow the goal-based approach (MSC.1/Circ.1394/Rev.2) by specifying goals and functional requirements for each section forming the basis for the training for seafarers on ships using new technologies and alternative fuels, as mentioned below.

2 General

2.1 Application

Unless expressly provided otherwise, these Interim Guidelines apply to seafarers on ships using new technologies and alternative fuels specified below to which part G of SOLAS chapter II-1 applies, as well as interim guidelines on ships using alternative fuels adopted by the IMO.

2.2 Definitions and terminology

For the purpose of these Interim Guidelines, the terms used have the same meaning as in SOLAS chapter II-2, the STCW Convention and Code and the Interim Guidelines for the safety of ships using alternative fuels as adopted by IMO.³

“New technologies and alternative fuels” mean fuels, power installations and systems listed in annex 1 to document MSC 108/5 including methyl/ethyl alcohol, hydrogen, ammonia, fuel cell installations, low flashpoint oil fuels (including biofuels), LPG, battery energy storage systems and wind-assisted propulsion systems. Any new fuel or technology being developed will be added in this definition. For ease of reference, they will be referred to as “alternative fuels” in the Interim Guidelines.

3 Goal and functional requirements

3.1 Goal

The goal of these Interim Guidelines is to provide an international standard for the development and approval of training of seafarers working on ships using alternative fuels to ensure that those seafarers operate such ships with at least the same level of safety and reliability as seafarers on ships equipped with new and comparable conventional oil-fueled main and auxiliary machinery installations, regardless of the specific fuel, installation or system.

3.2 Functional requirements

3.2.1 The training should address the specific characteristics and risks that the seafarers

³ MSC.1/Circ.1666, MSC.1/Circ.1666, MSC.1/Circ.1647, MSC.1/Circ.1621

might endure while working on ships using alternative fuels.

3.2.2 The training should be relevant to the different competence functions, as defined in the STCW Code, and at the different levels of responsibility.

3.2.3 The training and specific familiarization should be imparted by qualified personnel experienced in the handling and characteristics of the alternative fuels used and the safety procedures involved, to the satisfaction of the Administration.

3.2.4 A more detailed interim guidance for each alternative fuel should be developed, if necessary, avoiding at the same time, the fragmentation of knowledge and training.

4 General provisions for training

4.1 Goal

The goal of this section is to provide for a generic training on all the seafarers on ships using alternative fuels regardless of their function.

4.2 Functional requirements

4.2.1 All seafarers serving on board ships using alternative fuels should, prior to being assigned shipboard duties, receive appropriate ship and equipment specific familiarization as specified in regulation I/14.1.5. of STCW Convention.

4.2.2 All seafarers should receive training in general knowledge and understanding of the specific alternative fuel that the ship is using. In particular, training should include specific knowledge on the alternative fuel's properties and health hazards, such as toxicity, the personal protective equipment that should be used.

4.2.3 All seafarers should receive training on the necessary precautions and measures to reduce risks and to protect themselves, as well as to respond to emergencies taking into account the specificities of the respective alternative fuel, in particular theoretical and practical training in simulated real conditions regarding fire prevention, fire fighting, and in entry in enclosed, hazardous, toxic areas or spaces.

4.2.4 All seafarers should receive training in the relevant routine operations using the specific alternative fuel, in particular, those concerning bunkering operations or charging, as well as on the relevant regulations, rules and requirements related to the specific alternative fuel, power installation or energy storage system.

4.2.5 All seafarers should receive training on measures to be taken in the event of leakage/spillage or release of the alternative fuels.

4.2.6 Drills and emergency exercises on board ships using alternative fuels must be conducted at regular intervals in conformity with the requirements of the SOLAS Convention and procedures of the safety management system manual.

5 Specific standards for training

5.1 Goal

The goal of this section is to provide for specific minimum standard KUPs that the training should address depending on the specific characteristics of the alternative fuels, as well as the ships using them.

5.2 Technical requirements

5.2.1 Seafarers employed on ships within the scope of these Interim Guidelines should receive training to understand physical and chemical properties of each respective alternative fuel and also on the risks and emergency procedures associated. On that basis, the seafarers responsible for designated safety duties associated with the care, use or in emergency response working on ships using alternative fuels should receive a training

specifically designed on the alternative fuel(s) used in the ship. The minimum KUPs areas that the training should include, depending on their function, are:

- .1 operation, functioning and monitoring of the respective alternative fuel's system and/or engine;
- .2 operation and procedures for onboard safety systems;
- .3 alternative fuel's specific aspects and requirements related to voyage planning, when necessary;
- .4 planning, documenting, executing and monitoring the safe bunkering of the respective alternative fuel;
- .5 performing maintenance and repairs on the respective alternative fuel's systems. This could include, inter alia, knowledge of preventing fuel release or contamination.
- .6 condition and prepare the tanks, when necessary;
- .7 operating ventilation systems related to the respective alternative fuel;
- .8 operation and maintenance of auxiliary systems related to the alternative fuel's system;
- .9 operational limitations inherent to the alternative fuel;
- .10 fire prevention procedures and firefighting operations on a ship using alternative fuels;
- .11 methods of storage, their connections and cleaning installations of the respective alternative fuel; and
- .12 understanding physical and chemical properties of each respective alternative fuels for its safe handling.

The Administration may, in respect of ships of less than 500 gross tonnage, except for passenger ships, if it considers that a ship's size and the length or character of its voyage are such as to render the application of the full requirements of this section unreasonable or impracticable, exempt the seafarers on such a ship or class of ships from some of the requirements, bearing in mind the safety of people on board, the ship and property and the protection of the marine environment.

6 Documentation/Evidence of training

6.1 Goal

The goal of this section is to ensure that the seafarers are able to prove that they have completed training of the relevant alternative fuel.

6.2 Technical requirements

Administrations shall ensure that documentary evidence should be issued indicating that the holder has completed successfully the training required under these Interim Guidelines.