

# COMMENTARY ON CHAPTER VII:

## ALTERNATIVE CERTIFICATION

Chapter VII of the STCW Annex, and the associated sections of the STCW Code, allow for STCW certificates to be based on an alignment of the seven functions and three levels of responsibility which is different from the alignment or structure provided for in Chapters II (deck department) and III (engine department).

### Regulation VII/1 - Issue of Alternative Certificates

This regulation explicitly allows Parties to issue or authorize the issue of certificates other than those mentioned in other chapters, provided that a number of conditions are met, such as the following:

- (1) The functions and levels of responsibility stated on the certificate are to be identical to the seven functions and three levels of responsibility already appearing in the relevant sections of Part A of the Code.
- (2) Candidates must meet the approximate standard of competence as well as other requirements as set out in section A-VII/1 of the STCW Code.

Section A-VII/1 of the Code essentially requires candidates for certification at the operational level to (a) meet the requirements for all three functions under Chapter II before being entitled to qualify for one function under Chapter III; or (b) meet the requirements for all four functions under Chapter III before being entitled to qualify for one function under Chapter II. One of the functions (e.g., controlling the operations of the ship and care for passengers on board) is very similar for those who qualify for certification under either Chapter II or III; so the flexibility involves the other functions: navigation; marine engineering; cargo handling and stowage; electrical, electronic and control engineering; and maintenance and repair. A candidate for certification as master (management level) must in all cases meet the table of competence in Section A-II/1 and A-II/2 whether or not he or she is qualified in specified functions under Chapter III. Similarly, a candidate for certificates as chief engineer officer (management level) must meet the table of competence in Section A-hIII and A-hhI/2 whether or not he or she is qualified in specified functions under Chapter II.

Finally, a candidate for a certificate at the support level in navigation or marine engineering must in any case meet the standard of competence prescribed in Section A-II/4 or A-III/4 as appropriate.

- (3) Candidates must have completed approved seagoing service. The minimum period for certification at the operational level is to be not less than one year, with six months performing bridge watchkeeping duties, and six months performing engine-room duties; and a training record book is to be used as documentary proof that the candidate has completed required training and assessment. Section A-VII/2 of the STCW code also sets a minimum period of seagoing service, with certain categories of experience, for a combined master/chief engineer, management-level certificate.

(4) Candidates for certification who are to perform navigation at the operational level must meet the radio operator requirements of Chapter IV.

(5) Certificates are to be issued in compliance with regulation 1/9 (medical fitness - issue and registration of certificates), as discussed in section 4 of this handbook.

(6) A specimen of the safe manning document issued to ships authorized to employ seafarers holding alternative certificates is to be provided to the Secretary-General of IMO in accordance with Section A-I/7 of the STCW Code.

As discussed below, regulation VII/3 also places some restrictions on the use of alternative certification arrangements.

### **Regulation VII/2 - Certification of Seafarers**

This regulation simply reiterates that even under alternative certification arrangements, seafarers performing functions or groups of functions for which certification is required under Chapters II, III or IV must hold the appropriate certificate.

### **Regulation VII/3 - Principles governing the issue of alternative certificates**

Certain principles apply to all alternative certificate arrangements employed under the STCW Convention. Among the most significant of these are the following:

(1) The alternative certification system is to ensure that the degree of safety and pollution prevention must be at least equivalent to that provided by the other chapters.

(2) The certificates issued under an alternative certification system are to be "interchangeable" with those issued under other chapters. In other words, a seafarer certificated under Chapter VII should be able to serve on a ship having a traditional (i.e., deck/engine department) shipboard organization; and the seafarer should not be trained only for a specific shipboard arrangement which might impair his or her ability to work on another ship with a different arrangement.

(3) The issuance of alternative certificates is not to be used in itself to reduce the size of the crew; to lower the integrity of the profession (i.e., reduce the mariner to a technician who does not have an integrated understanding at professional level of how skills and knowledge are interrelated); or to justify combining engine and deck watchkeeping duties in a single certificate holder during any particular watch.

(4) The competence of both deck and engineer officers is to be maintained;

(5) The person in command is to be designated as the master and his or her authority is not to be affected by implementation of an alternative certification system on a ship.

The concepts and principles reflected Chapter VII allow for innovation and experiment. IMO will be monitoring developments to assess the need for modifying the requirements in the regulations or associated parts of the STCW Code.