

DMA RO Circular no. 020

Regarding minimum safe manning document and the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended

1. Introduction

Implementation of the STCW Convention may raise various questions during Port State Control inspections because of differences in the application of the Convention in different countries.

The intention of this publication is to explain the procedures followed by the Danish Maritime Authority.

The procedures comply with the provisions of the Convention, as amended. Furthermore, attention is directed to the IMO STCW.7 Circulars, which contain internationally agreed clarification regarding the application of the provisions of the STCW Convention, as amended.

Verification of the procedures described herein or any enquiries regarding the contents of this publication that may arise during Port State Control inspection may be directed to the Danish Maritime Authority, tel.: + 45 72 19 60 00, e-mail: ro@dma.dk.

2. Explanatory note

Supplementary remarks to several regulations, etc. are given in the following appendices 1 and 2.

With this circular, the Danish Maritime Authority hopes to contribute to a smooth completion of Port State Control inspections as far as they concern the application of the STCW Convention in Danish ships and the manning of ships.

As stated in Article X of the STCW Convention, all possible efforts must be made by Port State officials to avoid a ship being unduly detained or delayed when exercising control. It is also stated that, if a ship is unduly detained or delayed, it must be entitled to compensation for any loss or damage resulting therefrom.

Minimum safe manning documents	
Watchkeeping certificates for ratings	<p>Watchkeeping certificates for deck ratings issued in accordance with regulation II/6 of the STCW Convention in force before 1 February 1997 (STCW 78) are valid for service after 1 January 2017 as equivalent to a II/4 certificate issued in accordance with the STCW-95 Convention, as amended.</p> <p>If Danish Minimum Safe Manning Documents contains a special requirement of conditions regarding watchkeeping certificates for ratings referring to STCW95 II/4, the Danish Maritime Authority hereby confirms that a watchkeeping certificate endorsed according to STCW95 II/4 is in compliance with STCW, 1978, as amended.</p> <p>If an issued Danish certificate of proficiency as an able ship's assistant is endorsed in accordance with the STCW Convention, regulation II/4, no separate II/4 certificate is required or issued.</p>
Watchkeeping certificates for engine ratings	<p>According to the STCW Code, A-VIII/2, engine watchkeeping for ratings is not required.</p> <p>In Danish vessels, engine ratings do not take part in the engine room watch, thus watchkeeping engine ratings are not prescribed in minimum safe manning documents, and watchkeeping certificates for engine ratings issued in accordance with regulation III/4 of the STCW Convention are not required in Danish vessels or issued.</p>
Able ratings	<p>In minimum safe manning documents, the able ratings can hold three different kinds of positions with different education. The positions are:</p> <ol style="list-style-type: none"> 1) Able ship's assistants, 2) able seamen (able seafarer), and 3) efficient motormen (able seafarer engine). <p>An able ship's assistant is educated to work on deck as well as in the engine department, while an able seaman is educated to work in the deck department only and an efficient motorman is educated to work in the engine department only.</p> <p>An able ship's assistant can therefore always replace an able seaman or an efficient motorman.</p>
Ordinary ratings	<p>In minimum safe manning documents, ordinary ratings can hold three different kinds of positions with different education. The positions are:</p> <ol style="list-style-type: none"> 1) Ordinary ship's assistants, 2) ordinary seamen (ordinary seafarer), and 3) trainee motormen (ordinary seafarer engine). <p>An ordinary ship's assistant is educated to work on deck as well as in the engine department, while an ordinary seaman is educated to work in the deck department only and a trainee motorman is educated to work in the engine department only.</p> <p>An ordinary ship's assistant can therefore always replace an ordinary seaman or a trainee motorman.</p>
Certification as radio operator	<p>In Danish vessels, the minimum safe manning document states how many of the navigators, including the master, should as a minimum hold a General/Restricted Operator's Certificate (GOC/ROC) GMDSS Certificate.</p> <p>Those certificates are issued pursuant to the order on radio tests and certificates in GMDSS and the order on the use of radio frequencies without a permit and on amateur radio tests and call signs, etc.</p>

Appendix 1 Minimum safe manning (continued)

Minimum safe manning document	
Oil, chemical, and gas certificates Regulations V/1-1 and V/1-2	<p>On minimum safe manning documents, the Danish Maritime Authority does not necessarily state the requirements of STCW regulation V/1-1, paragraph 3, V/1-1, paragraph 5, or V/1-2, paragraph 3.</p> <p>Masters, chief mates, chief engineer officers, and second engineer officers, and any person with immediate responsibility on tankers must comply unconditionally with the requirements mentioned above.</p>
Ships powered by main propulsion machinery of less than 750 kW propulsion power	<p>The minimum safe manning document for ships powered by main propulsion machinery of less than 750 kW propulsion power does not prescribe engineers with certificates endorsed in accordance with the STCW Convention. Instead it is required that a number of the crew (1 or 2 persons) hold a Danish certificate of proficiency in motor operation. In cases where a person is required to hold a certificate of proficiency in motor operation, the person concerned may at the same time be employed to perform other types of service on board.</p>
Electro-technical officer and electro-technical rating	<p>On Danish vessels, no electro-technical officers (STCW Reg. III/6) or electro-technical ratings (STCW Reg. III/7) are required because competencies according to STCW Reg. III/6 and STCW Reg. III/7, respectively, are held by prescribed engineer officers holding a certificate of competency according to STCW Reg. III/1, III/2, and III/3.</p> <p>In case a reefer electrician has signed on in surplus to the vessel's safe manning document requirement, and the reefer electrician is – under the supervision of one of the vessel's engineer officers – assigned duties related to supervision, maintenance, plugging and unplugging of reefer units, she or he is not required to hold an STCW Reg. III/6 certificate of competency or an STCW Reg. III/7 certificate of proficiency or to be in possession of a Danish endorsement certificate.</p>
Ships fitted with ARPA	<p>On ships fitted with ARPA, watchkeeping officers must comply with the STCW Code, table A-II/1, about the competent use of radar and ARPA to maintain safety of navigation.</p> <p>Persons holding certificates of competency as watchkeeping officers with the limitation "Not valid for ships fitted with ARPA" must not serve as watchkeeping officers on ships fitted with ARPA.</p> <p>If no limitation regarding ARPA is stated on the certificate of competency as deck officers, the holders fulfil the STCW Code, table A-II/1.</p>
Ships fitted with ECDIS	<p>On ships fitted with ECDIS, watchkeeping officers must comply with the STCW Code, table A-II/1, about the competent use of ECDIS to maintain safety of navigation.</p> <p>Persons holding certificates of competency as watchkeeping officers with the limitation "Not valid for ships fitted with ECDIS" must not serve as watchkeeping officers on ships fitted with ECDIS.</p> <p>If no limitation regarding ECDIS is stated on the certificate of competency as deck officers, the holders fulfil the STCW Code, table A-II/1.</p>
ISPS – manning level	<p>When issuing minimum safe manning documents, the principles of safe manning as described in IMO resolution A.1047(27) are taken into account.</p> <p>Minimum safe manning documents issued before 1 July 2002 have been evaluated and the Danish Maritime Authority has found that the minimum safe manning meets the requirements of the ISPS Code regarding manning levels.</p>

Appendix 1 Minimum safe manning (continued)

Minimum safe manning document	
Certificates of competency issued by the Government of the Faroe Islands	<p>Seafarers, including masters, serving on or about to start serving on Danish merchant vessels must hold a Danish health certificate, which contains the result of a Danish medical certificate.</p> <p>Seafarers are required to bring on board only the health certificate, and not the medical certificate.</p>
Designation of rank grade and capacity in minimum safe manning documents valid for ships registered in the Danish International Register of Shipping (DIS)	<p>The Minimum safe manning document issued by the Danish Maritime Authority has been certified and ratified in preparation for the best possible adoption and description of a minimum number or complement of dual purpose officers or a minimum number or complement of a combination of single string and dual string officers.</p> <p>Apart from the master, all other officers can have various rank and grade descriptions, however provided that the ship is manned with a sufficient number of officers with the prescribed certificates of competency stipulated in the vessel's minimum safe manning document.</p> <p>Any enquiry regarding officers' compliance with the requirements of Danish maritime law as well as the STCW Convention may be directed to the Danish Maritime Authority.</p>
Periodically unattended machinery spaces	<p>Relation between permission to have periodically unattended machinery spaces and the technical class notation.</p> <p>When the Danish Maritime Authority permits a vessel to operate with periodically unattended machinery spaces, the vessel must meet the rules of a recognized classification society to that effect through a relevant UMS notation or statement, or be equipped in accordance with the Danish Maritime Authority's guidelines for sailing with periodically unmanned machinery spaces.</p>

Appendix 1 Minimum safe manning (continued)

Minimum safe manning document	
Sailing some crewmember short	<p>In case of a deprivation of one or more crew members, the master must, in consultation with the company, conduct a safety assessment.</p> <p>Should a Danish vessel be in a situation where it is deprived of any member(s) of the crew beyond the control of the master or the owner for instance due to illness, death or desertion, the correct procedure is as follows:</p> <p>Inform the PSC authority in the next port of call in advance as well as the Danish Maritime Authority by e-mail to the address psc@dma.dk.</p> <p>No approval or "to whom it may concern" letter from the Danish Maritime Authority is necessary.</p> <p>Have a copy of consolidated act no. 74 of 17 January 2014 on the manning of ships ready for presentation to the PSC surveyor upon request. The act is available from the English webpage of the Danish Maritime Authority: Click here.</p> <p>Make the necessary entry of the particulars of the case in the ship's log book.</p> <p>Prepare a work schedule and plan the crew's rest hours so that it is documented that the ship can be operated safely, while complying with the current provisions on work/rest hours.</p> <p>Prepare documentation stating the name of the crewmember who will be signing on as well as the expected date and port of signing on.</p> <p>Section 11 of Consolidated act on the manning of ships stipulates: "If a ship is deprived of any member(s) of the prescribed crew through illness, death, desertion or any other cause whatsoever beyond the control of the master or the owners, no requirements in or issued in accordance with this act shall prevent the master from continuing the voyage, on the condition that due regard be paid to the seaworthiness of the ship. The crew shall, however, be completed as soon as possible. The master shall make the necessary entry of the particulars of the case in the ship's log book or, where no log book is kept, in the survey book."</p>

Appendix 2 STCW regulations

STCW regulations	
For further information, please see "DMA RO Circular no. 021 regarding the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended"	
Documentation on Danish ships for compliance with basic training for officers	<p>Documentation on Danish ships for compliance with basic training requirements in section A-VI/1, paragraph 2, is Danish certificates of competency issued to officers, cf. Annex to STCW.7/Circ.24/Rev.1 – see page 7 and 8.</p> <p>Seafarers holding a Danish certificate of competency comply with the basic training requirements (regulation VI/1, the STCW Code, section A-VI/1, paragraph 2, on basic training as specified in tables A-VI/1-1, A-VI/1-2, A-VI/1-3 and A-VI/1-4) and separate certificates are not issued.</p>

STCW regulations	
For further information, please see "DMA RO Circular no. 021 regarding the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended"	
Interim provisions relatet to advanced fire-fighting and basic safety, etc.	<p>Until 31 December 2016, the master of a Danish flagged vessel or the Danish ship owner (of that vessel) may issue documentation of refresher courses in advanced fire-fighting on board ships, when the seafarer has, within the last five years, completed at least 12 months' seagoing service.</p> <p>Until 31 December 2016, the master of a Danish flagged vessel or the Danish ship owner (of that vessel) may issue documentation of basic safety refresher training to seafarers who are not obliged to hold a certificate of competency when they have, during the last five years, acquired at least 12 months' seagoing service.</p> <p>A separate certificate of proficiency for having attended refresher courses in the operation of survival craft and rescue boats, except for fast rescue boats, STCW Reg. A-VI/2 table 1 as well in advanced fire-fighting on board ships, STCW A-VI/3 table 1- can only be required for seafarers who have been listed on one of the vessel's relevant muster lists.</p>
Ordinary and able ship's assistants	<p>Seafarers having fulfilled Danish training as ship's assistants comply with the basic training requirements (regulations II/4, II/5, III/5, V/1-1, paragraph 2.2, V/1-2, paragraph 2.2, VI/1, the STCW Code, section A-VI/1, paragraph 2, on basic training as specified in tables A-VI/1-1, A-VI/1-2, A-VI/1-3 and A-VI/1-4, and VI/6-4). In Denmark, the necessary education and training is part of mandatory shore-based training.</p> <p>The Danish Maritime Authority and approved maritime education training institutes issue certificates for ordinary and able ship's assistants according to regulations II/5 and III/5.</p> <p>According to regulation I/11, no date of expiry is added to certificates for ratings who have signed on as ship's assistants.</p>
IMDG Code	Certificates of competency in accordance with the provisions of regulations II/1, II/2, II/3, III/1, III/2, and III/3 meet the requirements of the STCW Code, Section B-V/c.
Persons on board not listed on the safe manning document or the vessel's muster list	<p>Supernumerary persons on board, such as repairmen and painters clearly having no designated safety, security or pollution prevention duties, are not required to have completed basic training as described in the STCW Code, section A-VI/1, paragraph 2.</p> <p>These persons must – as all other seafarers – have completed familiarization training or instruction as required in section A-VI/1, paragraph 1, of the STCW Code, and the master is required to be able to present evidence of this in form of signed familiarisation checklists – stating that these persons have been made familiar with shipboard equipment, operating procedures and other arrangements needed for the proper performance of their duties – and they have been made familiar with ship-specific watchkeeping, safety, security, environmental protection, and emergency procedures and arrangements.</p> <p>Documentary evidence / a separate certificate issued to each individual person is not required.</p> <p>A separate certificate of proficiency for having attended refresher courses in the operation of survival craft and rescue boats, except for fast rescue boats, STCW Reg. A-VI/2 table 1 as well in advanced fire-fighting on board ships, STCW A-VI/3 table 1- can only be required for seafarers who have been listed on one of the vessel's relevant muster lists.</p>

ANNEX**GUIDANCE FOR PARTIES, ADMINISTRATIONS, PORT STATE CONTROL
AUTHORITIES, RECOGNIZED ORGANIZATIONS AND OTHER RELEVANT PARTIES
ON THE REQUIREMENTS OF THE STCW CONVENTION, 1978, AS AMENDED****Provision of documentation for verification**

1 Under regulation I/2 of the STCW Convention, 1978, as amended, the documentation authorizing the holder to serve in certain functions on board ship are certificates of competency and certificates of proficiency and, only with regard to regulation V/2, documentary evidence. The list of certificates or documentary evidence required under the STCW Convention, 1978, as amended, is set out in table B-I/2 of the STCW Code.

2 Certificates of competency, certificates of proficiency and documentary evidence issued in accordance with chapters II, III, IV, V, VI and VII of the STCW Convention, 1978, as amended, are evidence of having successfully completed all required training and that the required standard of competence has been achieved.

3 While IMO model courses may assist with the development of training programmes, they are not mandatory, and Administrations are not required to use them when preparing and approving training courses to meet the objectives of the STCW Code, as amended.

4 The validation of an IMO model course means that no reason was found to object to its contents. It does not mean that it is an official interpretation of the Convention, or that approval was granted by the IMO bodies.

5 It is agreed that:

- .1 in accordance with regulation I/4 of the STCW Convention, 1978, as amended, seafarers should not be required to provide documentation for verification that is not required by the Convention; and
- .2 certificates or documentary evidence issued under the STCW Convention, 1978, as amended, should not be required to contain reference to IMO model courses.

References to the STCW Convention, 1978, as amended

6 The normal practice within IMO is to refer to international conventions by an acronym of the title of the convention and the date on which it was made (e.g. SOLAS 1974). Where amendments are made to the original convention, the title is then amended to reflect the amendments (e.g. SOLAS 1974, as amended) but it is not normal practice to append the year/dates of the amendments to the title of the amended convention.

7 It has been reported that different references to the STCW Convention, 1978, as amended, can be found in certificates and endorsements, which has led to some confusion. In particular, if the references had different meanings, or if the differences were unintentional.

8 The format of certificates and endorsements provided in section A-I/2 of the STCW Code refers to "the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended".

9 In order to avoid confusion, it is recommended that certificates and endorsements referring to the STCW Convention use the reference "the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended", without appending the year/dates of the amendments.

10 It is important to note that seafarers may hold certificates and documentary evidence that contain a different reference to the STCW Convention that remain valid and should be accepted.

Training requirements for Electronic Chart Display and Information Systems (ECDIS) and provision of the documentation for verification

11 The STCW Code contains requirements for approved training on ECDIS. In cases where the approved training has not been completed, a limitation shall be included on the certificate and endorsements issued to the seafarer. Where such a limitation is not specified, the certificate and endorsements are evidence of having successfully completed the required approved training and that the standard of competence has been achieved.

12 No requirement exists for the approved training on ECDIS equipment to be type-specific. The knowledge, understanding and proficiency required to be demonstrated is generalized to ensure seafarers have the necessary skills for basic operation of all types of equipment.

13 In accordance with regulation I/14, companies are responsible for ensuring that seafarers employed on their ships are familiarized with the installed equipment, including ECDIS.

14 It is agreed that seafarers required to have training in the use of ECDIS:

- .1 should not be required to provide documentation of training in ECDIS that is specific to the installed equipment; and
- .2 are required to be familiarized with the ECDIS equipment installed on board.

Regulations II/5 (able seafarer deck), III/5 (able seafarer engine), III/6 (electro-technical officers) and III/7 (electro-technical ratings)

15 Misinterpretation of the applicable provision of regulations II/5, III/5, III/6 and III/7 has been reported. In particular, port State control officers have required personnel on board to possess applicable Certificate of Competency or Certificate of Proficiency, when such personnel are not included in the Minimum Safe Manning Document (MSMD) of the ship.

16 Port State control officers, recognized organizations and other relevant parties are reminded that under paragraph 2.1 of appendix 11 of the *Procedures for port State control, 2011* (resolution A.1052(27)), "If a ship is manned in accordance with a MSMD or equivalent document issued by the flag State, the port State control officers should accept that the ship is safely manned".