
Evaluation of the Maritime Education, Training and Certification System in Pakistan

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Summary

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1-0		Issued for action
2-0		Revised to include corrective actions on shortcomings and observations as new Appendix D and updates to Executive Summary and Introduction to suit.

List of abbreviations

Abbreviation	Description
CoC	Certificate of Competency
CoP	Certificate of Proficiency
DG-P&S	Directorate General - Ports and Shipping
IMO	International Maritime Organization
MMD	Mercantile Marine Department
MTI	Maritime Training Institute
PMA	Pakistan Maritime Academy
SOP	Standard Operating Procedure
SRO	Statutory Regulatory Orders
STCW	Standards of Training, Certification and Watchkeeping for Seafarers
STW	Seamen Training Wing

Executive summary

This report presents the results of the evaluation of the maritime education, training and certification system of Pakistan, carried out by assessors from Lloyd's Register International between 22nd February and 31st March 2021. The evaluation was to reassess the system for compliance to the latest requirements of the STCW Convention and Code. The evaluation included reviews of the Directorate General (Ports and Shipping (DG-P&S) head office in Karachi, Pakistan, and visits to two maritime training institutions, the Maritime Training Institute and the Seamen Training Wing, both in Karachi. Due to the COVID-19 restrictions on travel the reviews were conducted by video conference and exchanges of documents and records. Brief physical visits were conducted to the training institutes to evaluate the physical facilities at the institutes.

A total of seven findings were identified, three of which are graded as a Shortcomings and four as Observations. Shortcomings are areas where the STCW Convention or Code is not being fully complied with and need to be corrected. A detailed description of each Finding is included in Section 8 of this report.

The system for maritime education, training and certification in Pakistan is considered to be well established, adequately defined and implemented to meet most of the requirements of the STCW Code. Although there are outstanding Shortcomings, they all relate to the management of the certification quality system and have no direct impact on the effectiveness of the seafarer certification processes. The results of this evaluation indicate that further work is required to refine the certification quality system and so meet all the relevant provisions of the STCW Convention in Pakistan, in accordance with regulation I/8 of the Convention and section A-I/7, paragraphs 4 to 6 of the Code.

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1. INTRODUCTION

1.1 Background

The requirements of Regulation I/8 and Section A-I/8 of the Standards of Training, Certification and Watchkeeping for Seafarers (STCW), Reference A, require an independent evaluation of the quality standards system operated by the National Administration. Such evaluations are to be conducted every 5 years. In Pakistan, the National Administration is the Directorate General - Ports and Shipping (DG-P&S), a Directorate within the Ministry of Maritime Affairs.

The STCW was adopted by the IMO in July 1978 and entered into force on 28th April 1984. Subsequent amendments were adopted in 1991, 1994, 1995, 1997, 1998, 2004, 2010, 2014, 2015 and 2016. The latest 2016 amendments entered into force on 1 July 2018.

The previous independent evaluation of the Pakistan Flag Administration was conducted by The Surveyors and Shipping Services in August 2009, refer to Reference B.

1.2 Terms of Reference of the Evaluation

The terms of reference of the evaluation, as defined in MSC.1/Circ.1449, were:

- quality assurance and audit functions of: the administration of training, assessment of competence, certification including issue of certificates of competency, medical certificates, endorsements and revalidation of certificates;
- administrative responsibilities for arrangements for internal audits and management reviews;
- the level of knowledge, understanding and skills appropriate to examinations and assessments required for each certificate are identified;
- education and training objectives and related standards of competence are clearly defined;
- procedures are followed to authorize, accredit or approve training courses, medical fitness, and competency assessment pursuant to the provisions prescribed in the Convention and Code, as amended; and
- implementation of mandatory amendments to the Convention and Code which entered into force after the previous independent evaluation.

1.3 Evaluation Methodology

The evaluation comprised five stages: desktop review of DG-P&S documentation, video interviews with staff at the DG(P&S) head office in Karachi, video interviews with staff at two Maritime Education and Training Institutes, physical visits to the two training institutes and report writing. The initial video interviews were conducted over seven days in accordance with the Evaluation Program, attached as Appendix A to this report. A final video interview was arranged with DG-P&S staff following the other interviews to clarify information.

The evaluation findings are presented as 'shortcomings' or 'observations', as defined below. The final decision as to whether a 'shortcoming' constitutes a noncompliance with the STCW Convention rests with the IMO Competent Persons review of this report.

Shortcoming – Full or partial failure to implement, or inadequate implementation, of a particular requirement of the STCW Convention.

Observation – A comment regarding the implementation of a requirement of the STCW Convention that may lead to a shortcoming if not addressed, or, a comment that may improve the process under evaluation.

1.4 Evaluation Team

The evaluation team consisted of three members listed below. The qualifications and experience of the evaluators is listed in Appendix B of this report.

1.4.1 Adrian Broadbent – team leader

Mr Broadbent is a naval architect with over 30 years' experience with Lloyd's Register in quality assurance, marine survey and regulation roles.

1.4.2 Bazlur Rahman – local auditor

Mr Rahman is an engineer with over 5 years' experience with the Pakistan National Shipping Corporation and a further 15 years' experience with Lloyd's Register on survey and audit roles.

1.4.3 Tony Field – expert reviewer

Mr Field is a Master Mariner with over 20 years' seagoing experience and a further 20 years' experience as a surveyor, auditor and senior manager at Lloyd's Register.

1.5 Acknowledgements

The evaluation team would like to thank the DG-P&S staff who provided support to the team for the successful completion of the evaluation. Their co-operation in making documents available and planning the visits to the training institutes was particularly appreciated. In addition, the staff at both the training institutes were unstinting in their support of the evaluation at their respective institutes.

2. MARITIME ADMINISTRATION, STRUCTURE & RESPONSIBILITIES

2.1 Directorate General Ports and Shipping

The Directorate General Ports and Shipping (DG-P&S) performs the function of the National Maritime Administration and is the focal point for co-ordination with the International Maritime Organization (IMO). It is the regulator of the Pakistan maritime sector and oversees the implementation of the IMO Conventions. The Mercantile Marine Department is the agency within DG-P&S that is responsible for Flag State implementation and hence the examination and certification of maritime professionals under the STCW Convention.

The mission of DG-P&S is:

To achieve safe and secure shipping, clean oceans and sustainable marine ecosystems through effective regulation, co-ordination and superintendence of maritime activities.

Implementation of the STCW Convention assists DG-P&S in achieving this mission.

DG-P&S headquarters are located in Karachi, Pakistan.

The current organisation chart is shown in Figure 2.1.

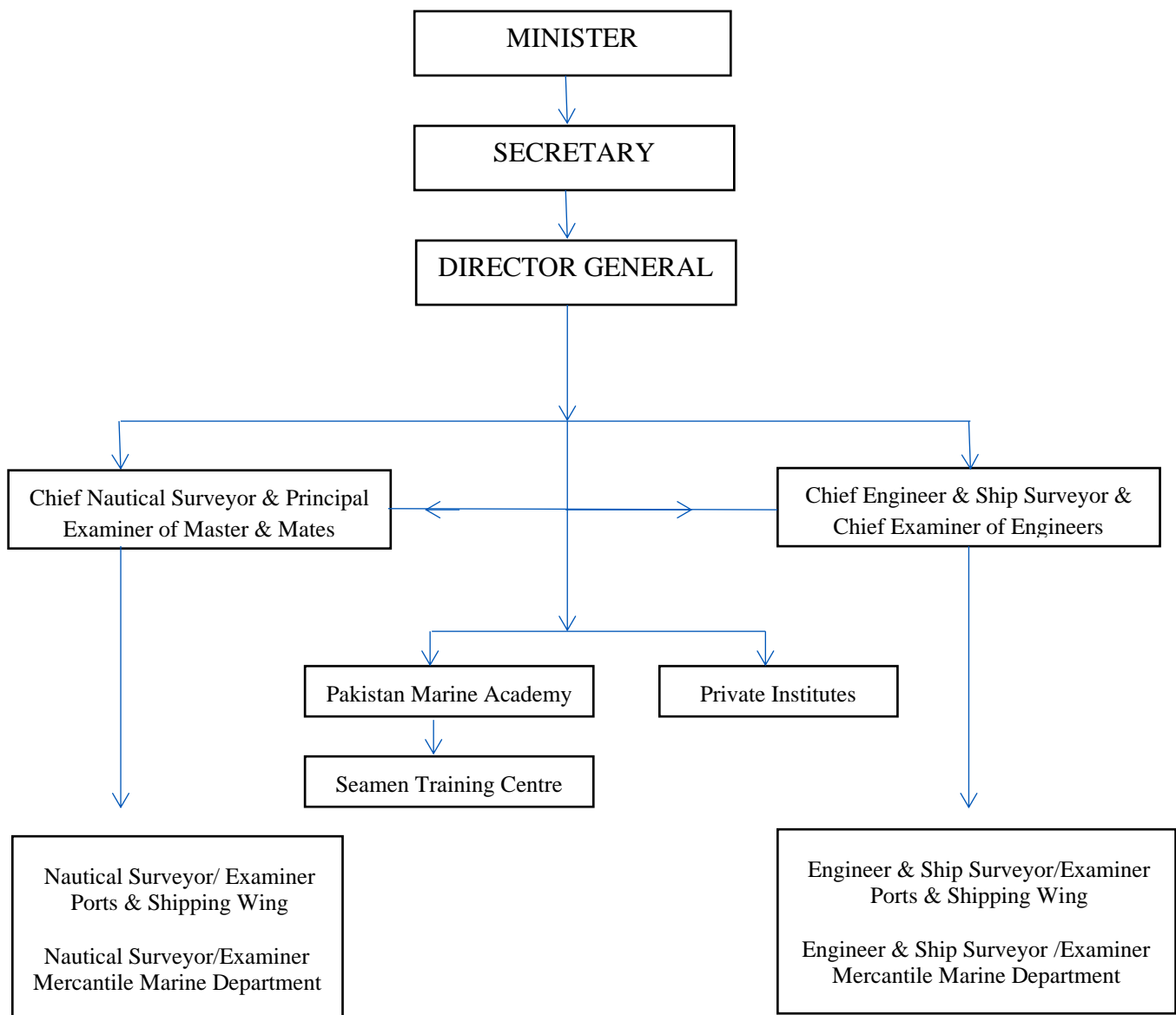


Figure 2.1 DG-P&S Organisation Chart

2.2 Pakistan Legislative Arrangements

The Pakistan Merchant Shipping Ordinance, 2001, (L II of 2001), Part IV, Chapter 6 “Certification of Competency”, contains the primary legislation which gives power to make regulations pertaining to the issue of STCW certificates to seafarers for the purpose of manning vessels that come under the Merchant Shipping Ordinance. Section 105 of the Ordinance provides for the Pakistan Federal Government to set Rules to “*regulate the grant of certificates of competency and the endorsements thereon under this Ordinance.*”

The DG-P&S organisation issues Statutory Regulatory Orders (SRO) as the mechanism to set the Rules required by the Ordinance. The two key SROs are:

- a) SRO 109 (KE)/2006), "Pakistan Merchant Shipping (Examination and Certification of Masters, Deck Officers and Safe Manning) Rules, 2006.
- b) SRO 110 (KE)/2005), "Pakistan Merchant Shipping (Examination and Certification of Marine Engineer Officers and Safe Manning) Rules, 2005.

Other Rules have also been issued for Hours of Work and Watchkeeping and use of the Seafarer Service Book. Further detail on all Rules is provided in Appendix C.

The DG-P&S organisation also issues Circulars to provide updates and interpretations of the STCW requirements and their own Rules (SROs). Further detail on current relevant Circulars is provided in Appendix C.

2.3 Maritime Education and Training

Maritime education and training in Pakistan are managed and controlled by DG-P&S under the Merchant Shipping Ordinance referred to above. The training is provided by two sectors, the government operated Pakistan Marine Academy and the associated Seamen Training Wing and nine other private institutes. Each institute is approved by DG-P&S to deliver training courses in accordance with the Mandatory Guidelines and Procedures for the Training of Deck and Engineer Officers (see Appendix C for details). These procedures define the approval criteria and processes for both the institute and the individual training courses.

3. MARITIME EDUCATION, TRAINING & CERTIFICATION

3.1 Overview

Maritime education and training are provided at vocational and higher education levels at a number of institutes in Pakistan. Eleven institutes provide training and qualifications applicable to STCW, but the majority provide only a selection of the short courses. Thirty-three training courses are currently approved by DG-P&S. Only four institutions provide a complete range of STCW training courses. These institutions are:

- College of Nautical Studies, Karachi;
- Maritime Training Institute, Karachi;
- Seamen Training Wing, Karachi; and
- Professionals Maritime Education and Training Institute (PROMETI), Karachi.

During this evaluation, the assessors visited a sample of two of the above institutes,

- Maritime Training Institute (MTI), as a representative of a private institute and
- Seamen Training Wing (STW), as a representative of a government institute.

3.2 Maritime Certification

All maritime certification for seafarers in Pakistan is issued by DG-P&S following application by the seafarer, with the required supporting documentation. A seafarer certificate is issued by DG-P&S under the authority of the Merchant Shipping Ordinance, Chapter 6, paragraph 95 (see Appendix C). The Issue process is defined in SRO 109 or 110, as applicable.

4. NATIONAL PROVISIONS

Appendix C lists the legislation and administrative instruments adopted by Pakistan to give effect to the provisions of the STCW Convention. The previous independent evaluation of DG-P&S was in August 2009, before the Manila Amendments were introduced in 2010 and came into force in January 2012. This evaluation has reviewed the updates to the Convention since 2012 and subsequent amendments to Pakistan regulations. The following updates were reviewed:

4.1 Manila amendments

DG-P&S Circular 001/2012 (ECDIS Simulator Training) issued in January 2012.

DG-P&S Circular 002/2012 (ECDIS, Refresher Training and Leadership) issued in January 2012.

DG-P&S Circular 003/2012 (Oil, Gas & Chemical Tankers, Deck Hand Training and Security Training) issued in February 2012.

DG-P&S Circular 004/2012 (ECDIS Simulator Training) issued January 2012.

4.2 2014 amendments – MSC.373 (93) and MSC.374 (93)

MSC.373 (93) – no changes to national documentation required.

MSC.374 (93) - no changes to national documentation required.

4.3 2015 amendments – MSC.396 (95) and MSC.397 (95)

DG-P&S Circular 018/2020 (Training Requirements for IGF Code, Polar Code and Passenger Ships) was issued in June 2020 to define the requirements for the IGF Code endorsements. IGF Code implementation has been evaluated by DG-P&S but has yet to be communicated to IMO as per STCW Code A-I/7. To date, DG-P&S have not issued any IGF Code endorsements.

4.4 2016 amendments – MSC.416 (97) and MSC.417 (97)

DG-P&S Circular 018/2020 (Training Requirements for IGF Code, Polar Code and Passenger Ships) was issued in June 2020 to define the requirements for the Polar and Passenger Ship endorsements. Implementation has been evaluated by DG-P&S but has yet to be communicated to IMO as per STCW Code A-I/7. To date, DG-P&S have not issued any Polar Code or Passenger Ship Code endorsements.

Observation: DG-P&S have a well-established process to issue new Circulars to the relevant parties and some circulars are posted on to the Mercantile Marine Department website. However not all Circulars on the current List of Circulars have been posted to the website. It is recommended that all current circulars are posted to the website.

5. EVALUATION OF THE MARITIME ADMINISTRATION

The evaluation of the DG-P&S activities was conducted over four interviews in accordance with the Program included as Appendix A. The general findings of the evaluation are described below.

5.1 Review of previous findings

Four previous evaluations appear to have been completed on the Pakistan Maritime Authority (DG-P&S).

The first in 2004 was held before the Manila amendments were issued, so is effectively discounted from this evaluation. A copy of the 2004 report was not sighted.

The second in August 2009 was an independent evaluation conducted by The Surveyors & Shipping Services and found no non-conformities or make any observations (refer to Reference B). That evaluation was held before the Manila amendments were issued, so is also effectively discounted from this evaluation.

The third report appears to have been completed in 2014, but no record is available in the DG-P&S office. However, it was submitted to IMO because a table of IMO STCW Panel observations is held by DG-P&S.

The fourth recorded evaluation was completed in June and July 2020. The 2020 evaluation was conducted by personnel from within the Mercantile Marine Department and so is not considered an independent evaluation. The report identified no non-conformances and two observations. The report also reviewed and accepted the corrective actions to the IMO STCW Panel observations from the 2014 report.

5.2 Quality Standards – Regulation I/8

The quality management system developed by DG-P&S is based on the requirements of the ISO 9001:2015 standard, but it has not been certified to that standard. This evaluation reviewed the key elements of ISO 9001:2015 to ensure that equivalent control is being applied to the DG-P&S processes.

The DG-P&S vision, mission and goals are defined on the organisation's website. Two of the Goals that are relevant to this evaluation are:

- a) Incorporation of International Conventions into National Legislation, and
- b) Availability of Qualified Maritime Professionals.

DG-P&S conducted an extensive review of their own processes and those of the approved Training Institutes in June and July 2020. The review included the administration of the certification system, approval of the training courses and the activities of eight of the eleven Training Institutes, including qualifications and experience of the instructors and the assessment processes.

All seafarer certification records are retained as paper records in a clearly defined filing system. Records requested were easily retrieved.

Observation – With seafarer certification records only held as paper records, consideration should be given to back-up arrangements in case of damage (fire or flood) to the records.

The documentation developed by DG-P&S, such as Rules, Circulars and internal procedures is primarily a paper-based system with no consistent identification, numbering or version control on the documents. Further work needs to be done on the documents to ensure that the latest issues are readily available to all users. It was noted that the two key SROs (109 and 110) are dated 2006 and 2005 respectively. The requirements have been updated to meet the Manila Amendments by issuing Circulars, and it is understood that new versions are currently being finalised to incorporate the Manila Amendments.

Observation – Updates to SROs 109 and 110 to be promptly progressed and the relevant Circulars withdrawn.

Shortcoming – Several documents sighted during the evaluation were not clearly identified as the latest issue or had no issue date or version identified. Examples sighted were:

Document	Deficiency
SRO 109/2006	Two versions were sighted, both with same 2006 date, but differing text.
SRO for Safe Manning, Hours of Work and Watch-keeping	No indication of SRO number.
SRO for Seafarer Service Book	No indication of SRO number.
CNS – SOPs for Operating Activities	No indication of approval authority or issue date on the documents themselves. A separate approval memo was sighted, dated 3 Feb 2020, however some indication of the issue date and approval should be included on the document itself.

In addition, it is suggested that the SRO documents should be posted to the Mercantile Marine Department website to enable easy access by all users. Currently, only some Circulars are available through the website. It is recognised that the SOP type documents are for internal use only.

5.3 Program and Course Design, Review and Approval – Regulations I/6 and I/8

The various Training Institutes are able to apply to DG-P&S for approval of their courses to meet STCW requirements. All submitted courses must be based on the published IMO Model Courses. The application process and the submission content are defined in the Procedure for 'Approved Modular, Simulator and Post-Sea Education and Training Programme for Training of Deck and Engineer Officers', issued 30 June 2018 (refer to Appendix C). A sample submission for a 'Basic Training for Oil and Chemical Tanker-Cargo Operations' course was satisfactorily reviewed.

5.4 Monitoring & Evaluation of Training and Assessment – Regulations I/6 and I/8

External evaluations of the 11 current training institutes are planned for a 12-month period, in accordance with section 1.14 of procedure for 'Approved Modular, Simulator and Post-Sea Education and Training Programme for Training of Deck and Engineer Officers'. All approved institutes were reviewed in June and July 2020 and further reviews are planned for later in 2021. The evaluations are recorded on the prescribed checklist. Samples were sighted.

5.5 Qualification and Training of Assessors, Instructors and Supervisors – Regulations I/6 and I/8

DG-P&S Procedure 'Approved Modular, Simulator and Post-Sea Education and Training Programme for Training of Deck and Engineer Officers', defines the lecturer qualifications and experience for DG-P&S approved courses. All instructors are required to have undergone training in the "Training for Trainers and Instructors" in the IMO Model Course 6.09. Those presenting training with simulators are also required to have been trained in the IMO Model Course 6.10 "Train the Simulator Trainer and Assessor" and be deemed competent with the type of simulator being used.

Records for all the instructors presenting STCW courses are maintained in the individual course approval files.

In addition, nominated DG-P&S staff have been approved as Examiners to conduct examinations as a final competence check of seafarers prior their certification. The Examiners are approved by way of their qualifications (usually Master Mariner), experience and six months of in-service training with other Examiners.

5.6 Assessment of Competence – Regulations I/6 and I/8

The assessment of instructor competence is conducted by the training institutes within their educational and training programs. A sample of instructors from the institutes visited were reviewed during those visits for their knowledge, qualifications and experience. Any specific issues are identified in sections 6 and 7 below.

The training of new DG-P&S competency Examiners includes working under the supervision of an experienced examiner for at least six months. Each Examiner is then 'peer reviewed' every two years. The process is defined in Circular ST 06/2020 (see Appendix C). Records of each Examiner's training are retained in the DG-P&S filing system. A sample of DG-P&S Examiner records were reviewed for appropriate knowledge, qualifications and experience.

5.7 Certification and Endorsement – Regulations I/2, I/3 and I/8

All short course certificates issued by the Training Institutes are on DG-P&S approved templates. Certificates not in accordance with the defined templates are rejected when the seafarer applies for certification.

The process for achieving seafarer certification is clearly defined in the SRO "Pakistan Merchant Navy Seafarer Service Book Rules, 2020" (refer to Appendix C). However, the document is not available through the website. The MMD website, Examinations page, refers to three DG-P&S Circulars 42-A, 47/2000 and 02/2010 covering the requirements for Deck and Engineering Ratings, but no document is provided for the Deck or Engineering Officers. Further, the website refers to STCW-78 as amended in 1995. The latest amendment was in 2018.

The sample of certificates sighted met the requirements of STCW Section A-I/2.

Shortcoming: The current Mercantile Marine Department website, Examinations page, refers to two DG-P&S Circulars 47/2000 and 02/2010 covering the requirements for Engineering Ratings. Reference to Circ 47/2000 should be deleted as it has been superseded by Circ 02/2010. The website also refers to Circular 42-A for the requirements for Deck Ratings, but a link to the Circular is not available on the website. The website does not refer to the requirements for Deck or Engineering Officers. The MMD website, Examinations page, needs to be updated to make relevant information readily available on the

certification requirements for all Deck and Engineering ratings and officers and refer to the latest amendment to the STCW Convention (or simply state 'as amended').

5.8 Registration – Regulations I/2 and I/8

DG-P&S maintains an electronic spreadsheet of all CoCs and CoPs issued, together with those revalidated, expired, suspended, cancelled or reported lost. The spreadsheet also includes information on the assessment of competence, seagoing service and medical certificates of the seafarers.

Information on the validity of certificates is provided through the Mercantile Marine website or on request by email.

5.9 Medical Standards – Regulations I/8 and I/9

The Merchant Shipping Ordinance, Chapter 9, Section 123 requires seafarers to hold a certificate of physical fitness and for the government to set the applicable Rules.

DG-P&S document SRO 109 (for Deck Officers), Section 12, SRO 110 (for Engineer Officers), Section 10(c) and SRO XX (I)2020 (for Ratings), Section 8(3)(d), require seafarers to hold a medical fitness certificate.

The Merchant Navy (Medical Examination) Rules, 2020, defines the requirements for the medical examination.

DG-P&S maintain a list of approved medical practitioners and it is published on the Mercantile Marine website, Medical Examinations tab. The latest update was 01 January 2020. It was confirmed that there have been no recent additions or deletions. A sample of a recent medical practitioner approval met STCW requirements.

The issued medical certification is DG-P&S Form Med01, Revision 3, Issued 09/13, which includes all the requirements of STCW section A-I/9.

Shortcoming: The version of the Medical Examination Rules that is available on the Mercantile Marine website was noted to have the following deficiencies:

- a) The title is "Medical standards for medical examination of Person". This differs from the reference in the SROs that it should be 'Merchant Navy (Medical Examination) Rules'. Title of the document needs to be clarified.
- b) The heading of the "Medical standards for medical examination of Person" document refers to a "Schedule VII {see Rule 7(ix)}". It is not clear what this Schedule and Rule refer to. A more logical reference would be MSO, Section 123.
- c) There is no evidence on the document who authorised it or the date issued.

5.10 Control procedures - Regulation I/4

It was noted that Pakistan is not a member of either the Tokyo or Indian Ocean MOUs for Port State Control inspections. However, DG-P&S do conduct Flag state inspections, International Safety Management Code (ISM) audits, Maritime Labour Convention inspections and investigations through its branch. Seafarers may be subject to regulatory action in accordance with the Merchant Shipping Ordinance.

5.11 Incompetence and Fraud Prevention – Regulation I/5

Executive management conducts investigations of reported seafarer incompetence. The authorities are defined in the Merchant Shipping Ordinance and the respective SROs. Nil cases of fraud have been recently reported. One case of incompetence was appropriately dealt with.

5.12 Training and assessment – Regulation I/6

DG-P&S have not approved any Shipping Company to provide in-service training to meet STCW requirements in accordance with STCW Code Section A-I/6 paragraph 4.

5.13 Recognition of certificates – Regulation I/10

The process for DG-P&S to recognise certificates issued by other countries is defined in SROs 109 or 110 as applicable.

5.14 Revalidation of certificates – Regulation I/11

The process for DG-P&S to revalidate certificates is defined in SROs 109 or 110 as applicable.

5.15 Conduct of trials - Regulation I/13

DG-P&S have not approved any ships to participate in trials that used automated and integrated systems in order to evaluate alternative methods of performing specific duties or satisfying particular arrangements.

5.16 Responsibilities of companies – Regulation I/14

DG-P&S conducts Flag State inspections, ISM audits, Maritime Labour Convention inspections and investigations to ensure that companies comply with their responsibilities.

5.17 Verification of compliance - Regulation I/16

The evaluation confirmed the following sections in Section A-1/16:

Equivalents – DG-P&S has not adopted any equivalent educational and training arrangements as specified in STCW Code section A-I/7.

Recognition of certificates – DG-P&S complies with MSC 1/cir.1164/Rev19, recognises certificates as per regulation I/10 and carries out authenticity checks with the issuing authority. Requirements are specified in SRO 109 or 110 para 4, as applicable.

Alternative certification – Alternative certifications are not accepted by DG-P&S.

Communication of information – this report is the independent evaluation pursuant to regulation I/8.

Conduct of trials – DG-P&S has not authorised any Pakistani vessels to participate in trials in accordance with regulation I/13.

Dispensations – DG-P&S has not issued any dispensations in accordance with Article VIII.

6. EVALUATION OF SEAMEN TRAINING WING

The Seamen Training Wing (STW) is a specialised department within the Pakistan Marine Academy (PMA) that offers STCW programs for Pakistani seafarers. PMA is the government operated merchant marine training academy within the Ministry of Maritime Affairs and was founded in 1962. STW employs 10 instructors and a number of management and support staff. The duration of courses varies from 2 days for some short courses up to 2 years for the cadet programs.

6.1 Quality Management

The Management System of the Pakistan Marine Academy was audited to the ISO 9001:2015 standard in December 2020 by Bureau Veritas Certification and has been recommended for approval. At the time of this evaluation, the approval certificate had yet to be received.

The certification audit conducted by Bureau Veritas in December 2020 indicated no non-conformances. Hence, no additional review of the QMS was done in this evaluation. All documents and records sighted appeared to be adequately controlled.

6.2 Program and Course Design, Review and Approval – Regs I/6, I/8, I/12 & I/15

STW courses and course changes are developed from the IMO Model Courses in accordance with the DG-P&S Guidelines. Course documentation is reviewed internally by the training team before submission to DG-P&S. As part of DG-P&S approval, the presentation of each course is witnessed by DG-P&S staff. Sample of documentation for the Elementary First Aid course was sighted and appeared satisfactory.

6.3 Qualification and Training of Assessors, Instructors and Supervisors – Regs I/6, I/8 & I/12

All STW instructors are approved for individual courses through the course approval process. All changes to course instructors are approved by DG-P&S staff. Samples of individual approvals were sighted.

Samples of staff qualifications for the simulators, firefighting, GMDSS, ECDIS were sighted and met the STCW requirements. The qualifications included Instructor Training for the applicable courses.

6.4 Training Facilities – Regulations I/6, I/8 and I/12

PMA/STW maintains or uses the following facilities:

- 6.4.1 Bridge simulator – TRANSAS/WARTSILA, software Navi-Trainer Professional 5000, Navi-Sailor 4000 & Navi-Planner 4000. Not yet approved by DG-P&S.
- 6.4.2 Engine Room simulator – TRANSAS/WARTSILA, software ERS 5000 Tech Sim VER 8.7.
- 6.4.3 ECDIS including ECDIS simulator, TRANSAS/WARTSILA, software ECID and TRANSAS (NT PRO 5000). Not yet approved by DG-P&S.
- 6.4.4 GMDSS simulator - TRANSAS/WARTSILA, software GMDSS Simulator 5000 + 6000. Not yet approved by DG-P&S.
- 6.4.5 Firefighting equipment demonstration room.
- 6.4.6 Firefighting mock up room.
- 6.4.7 On-site 25m swimming pool for lifesaving training.
- 6.4.8 Lifesaving equipment room with two inflatable demonstration rafts.
- 6.4.9 Lifeboat embarkation jetty with davit and 2 lifeboats.
- 6.4.10 First Aid demonstration room

All facilities were visited and all appeared suitable for the training required, noting the observation below.

6.5 Monitoring and Supervision of Training – Regulations I/6 and I/8

Each training course has an academic syllabus, which defines the assessment and monitoring processes for the course.

Performance during short courses is monitored on the Daily Attendance Sheets. For longer courses, monthly tests are completed.

Student Feedback forms are received from all courses. Sample of forms sighted for Firefighting, First Aid, Personal Safety, Personal Survival and Survival Craft courses. All indicated very positive feedback for both course contents and instructors and had been countersigned by the Officer in Charge.

6.6 Use of Simulators – Regulations I/8 and I/12

Lesson Plans were available for each course in each simulator and approvals are being progressed by DG-P&S. Engine Room simulator has been approved. Lesson Plans include lesson objectives, briefing and debriefing sessions, assessment guides (both written and practical) and result sheets. Handouts and other materials were available to the students.

Exercises for simulators are provided by the manufacturer (Transas/Wartsila) and appeared to meet STCW requirements.

All instructors and assessors have been appropriately trained as simulator trainers in accordance with STCW Code, section A-I/12, paragraph 9.

Observation: Three of the simulators (Bridge, ECDIS and GMDSS) at STW are yet to be approved by DG-P&S, but are in current use for non-STCW training. STCW seafarer competence is demonstrated by other means for those systems however may not be as comprehensive as simulator exercises. It is suggested that these approvals be progressed promptly to allow the simulators to extend the range of competencies of the seafarers.

6.7 Examinations – Regulations I/6, I/8 and I/12

The evaluation methods and criteria for each course are established in the academic syllabus. Students are assessed continually through tests and assignments, as well as end of course examinations.

All examination and assessment results are recorded in the course record folders.

6.8 Admission of Students & Issue of Documentary Evidence – Regs I/2 & I/8

Student applications are made through the PMA website. All applications are verified before acceptance to ensure the student has met all the course prerequisites, e.g. sea-going experience and English language skills.

On completion of all courses and assessments, the Certificate Register is completed and verified. Certificates are prepared, passed to DG-P&S for counter signature and issued by PMA to the student.

7. EVALUATION OF MARITIME TRAINING INSTITUTE

The Maritime Training Institute is a privately run institute formed in 1988 by the “M” International Group to provide education and training for the maritime industry. They provide a wide range of both practical and academic courses that include many related to STCW compliance. They are affiliated with other educational institutions such as the University of Karachi and City of Glasgow College (UK) to provide courses in their diploma and degree courses. The institute is accredited by DG-P&S for a number of STCW compliant courses.

The Maritime Training Department currently has nine teaching staff and a number of support staff and offers over 100 short courses, including the STCW mandatory courses for first aid, personal survival, firefighting and personal safety.

7.1 Quality Management

The Management System of “M” International Group is an integrated system covering all aspects of the business and complies with the ISO 9001:2015, ISO 14001:2015 and OSHAS 18001:2007 standards, certified by BVCH SAS. The ISO 9001:2015 certificate number is MER20.289UQ, expiring on 26 May 2023.

The October 2019 audit report by BVCH raised four minor nonconformances, none of which related to the maritime training activities. No additional review of the QMS was done in this evaluation. All documents and records sighted appeared to be adequately controlled.

7.2 Program and Course Design, Review & Approval – Regs I/6, I/8, I/12 & I/15

MTI courses and course changes are developed from the IMO Model Courses in accordance with the Maritime Training Standard Operating Procedure. Course documentation is reviewed internally by the training team before submission to DG-P&S. As part of DG-P&S approval, the presentation of each course is witnessed by DG-P&S staff.

7.3 Qualification and Training of Assessors, Instructors and Supervisors – Regs I/6, I/8 & I/12

All MTI instructors are approved for individual courses through the course approval process. All changes to course instructors are approved by DG-P&S staff. Samples of individual approvals were sighted.

Samples of staff qualifications for the simulators, firefighting, GMDSS, ECDIS, engineer watchkeeper and deck watchkeeper were sighted and met the STCW requirements. The qualifications included Instructor Training for the applicable courses.

7.4 Training Facilities – Regulations I/6, I/8 and I/12

MTI maintains or uses the following facilities:

- 7.4.1 Bridge simulator – TRANSAS/WARTSILA, software NT-PRO-5000 VER 5.40 (License No. 1743633)
- 7.4.2 Engine Room simulator – TRANSAS/WARTSILA, software ERS 5000 Tech Sim VER 8.8 (License No. 1760077).
- 7.4.3 ECDIS including ECDIS simulator, TRANSAS/WARTSILA, software ECID and TRANSAS (NT PRO 5000).
- 7.4.4 GMDSS simulator - TRANSAS/WARTSILA, software GMDSS Simulator 5000 + 6000 Ver 8.5 (License No 1760078)
- 7.4.5 Firefighting open area and equipment maintenance and storage area.
- 7.4.6 Lifesaving equipment room. Wet training is conducted at a nearby private swimming pool.
- 7.4.7 Lifeboat and davit.

Some of the facilities for the firefighting and lifesaving training were not visited, but photographs, videos or approvals of each facility were sighted. All appeared suitable for the training.

7.5 Monitoring and Supervision of Training – Regs I/6 and I/8

Each training course has an academic syllabus, which defines the assessment and monitoring processes for the course.

Performance during short courses is monitored on the Daily Attendance Sheets. For longer courses, monthly tests are completed.

Student Feedback forms are received from all courses. Sample of forms sighted for ER Simulator, GMDSS and Fast Rescue Boat all indicated very positive feedback for both course contents and instructors.

7.6 Use of Simulators – Regulations I/8 and I/12

Lesson Plans were available for each course in each simulator and have been approved by DG-P&S. Plans included lesson objectives, briefing and debriefing sessions, assessment guides (both written and practical) and result sheets. Handouts and other materials were available to the students.

Exercises for simulators are provided by the manufacturer (Transas/Wartsila) and appeared to meet STCW requirements.

All instructors and assessors have been appropriately trained as simulator trainers in accordance with STCW Code, section A-I/12, paragraph 9.

7.7 Examinations – Regulations I/6, I/8 and I/12

The evaluation methods and criteria for each course are established in the academic syllabus. Students are assessed continually through tests and assignments, as well as end of course examinations.

All examination and assessment results are recorded in the course record folders.

7.8 Admission of Students & Issue of Documentary Evidence – Regs I/2 & I/8

Student applications are made through the MTI website. All applications are verified before acceptance to ensure the student has met all the course prerequisites, e.g. sea-going experience and English language skills.

On completion of all courses and assessments, the Certificate Register is completed and verified. Certificates are prepared, passed to DG-P&S for counter signature and issued by MTI to the student.

8. SUMMARY OF FINDINGS

Finding Number	Finding Type	Description of Finding	STCW Regulation / Section	Report Section
1	Observation	DG-P&S have a well-established process to issue new Circulars to the relevant parties and some circulars are posted on to the Mercantile Marine Department website. However not all Circulars on the current List of Circulars have been posted to the website. It is recommended that all current circulars are posted to the website.	Regulation 1/8	4.4
2	Observation	With seafarer certification records only held as paper records, consideration should be given to back-up arrangements in case of damage (fire or flood) to the records.	Regulation 1/8	5.2
3	Observation	Updates to SROs 109 and 110 to be promptly progressed and the relevant Circulars withdrawn.	Regulation 1/8	5.2

Finding Number	Finding Type	Description of Finding	STCW Regulation / Section	Report Section										
4	Shortcoming	<p>Several documents sighted during the evaluation were not clearly identified as the latest issue, had no issue date or version identified or no authorisation. Examples sighted were:</p> <table border="1" data-bbox="629 325 1677 799"> <thead> <tr> <th data-bbox="629 325 1176 363">Document</th> <th data-bbox="1176 325 1677 363">Deficiency</th> </tr> </thead> <tbody> <tr> <td data-bbox="629 363 1176 435">SRO 109/2006</td> <td data-bbox="1176 363 1677 435">Two versions were sighted, both with same 2006 date, but differing text.</td> </tr> <tr> <td data-bbox="629 435 1176 507">SRO for Safe Manning, Hours of Work and Watch-keeping</td> <td data-bbox="1176 435 1677 507">No indication of SRO number.</td> </tr> <tr> <td data-bbox="629 507 1176 545">SRO for Seafarer Service Book</td> <td data-bbox="1176 507 1677 545">No indication of SRO number.</td> </tr> <tr> <td data-bbox="629 545 1176 799">CNS – SOPs for Operating Activities</td> <td data-bbox="1176 545 1677 799">No indication of approval authority or issue date on the documents themselves. A separate approval memo was sighted, dated 3 Feb 2020, however some indication of the issue date and approval should be included on the document itself.</td> </tr> </tbody> </table>	Document	Deficiency	SRO 109/2006	Two versions were sighted, both with same 2006 date, but differing text.	SRO for Safe Manning, Hours of Work and Watch-keeping	No indication of SRO number.	SRO for Seafarer Service Book	No indication of SRO number.	CNS – SOPs for Operating Activities	No indication of approval authority or issue date on the documents themselves. A separate approval memo was sighted, dated 3 Feb 2020, however some indication of the issue date and approval should be included on the document itself.	Regulation 1/8 and Section A-1/8	5.2
Document	Deficiency													
SRO 109/2006	Two versions were sighted, both with same 2006 date, but differing text.													
SRO for Safe Manning, Hours of Work and Watch-keeping	No indication of SRO number.													
SRO for Seafarer Service Book	No indication of SRO number.													
CNS – SOPs for Operating Activities	No indication of approval authority or issue date on the documents themselves. A separate approval memo was sighted, dated 3 Feb 2020, however some indication of the issue date and approval should be included on the document itself.													
5	Shortcoming	<p>The current Mercantile Marine Department website, Examinations page, refers to two DG-P&S Circulars 47/2000 and 02/2010 covering the requirements for Engineering Ratings. Reference to Circ 47/2000 should be deleted as it has been superseded by Circ 02/2010. The website also refers to Circular 42-A for the requirements for Deck Ratings, but a link to the Circular is not available on the website. The website does not refer to the requirements for Deck or Engineering Officers. The MMD website, Examinations page, needs to be updated to make relevant information readily available on the certification requirements for all Deck and Engineering ratings and officers and refer to the latest amendment to the STCW Convention (or simply state ‘as amended’).</p>	Regulation 1/8 and Section A-1/8	5.7										

Finding Number	Finding Type	Description of Finding	STCW Regulation / Section	Report Section
6	Shortcoming	<p>The version of the Medical Examination Rules that is available on the Mercantile Marine Department website was noted to have the following deficiencies:</p> <ul style="list-style-type: none"> • The title is “Medical standards for medical examination of person”. This differs from the reference in the SROs that it should be ‘Merchant Navy (Medical Examination) Rules’. Title of the document needs to be clarified. • The heading of the “Medical standards for medical examination of Person” document refers to “Schedule VII {see Rule 7(ix)}”. It is not clear what this Schedule and Rule refer to. A more logical reference would be MSO, Section 123 • There is no evidence on the document who authorised it or the date issued. 	Regulation 1/8 and Section A-1/8	5.9
7	Observation	<p>At STW, three of the simulators (Bridge, ECDIS and GMDSS) are yet to be approved by DG-P&S, but are in use for non-STCW training. STCW Seafarer competence is demonstrated by other means for those systems; however, these may not be as comprehensive as simulator exercises. It is suggested that these approvals be progressed promptly to allow the simulators to extend the range of competencies of the seafarers.</p>	Section A-1/12	6.6

References

- A International Convention on “Standards of Training, Certification and Watchkeeping for Seafarers”, Consolidated Edition 2017.
- B IMO Model Courses for STCW Convention, IMO Publications Catalogue.
- C The Surveyors & Shipping Services, of Karachi, Pakistan, an affiliate of Alexander & Hamilton Inc, USA, ‘Independent Evaluation Report’ dated 5th August 2009.

Appendix A Evaluation Program

Day 1 – 22 Feb 2021 – Video conference

1300 Introductory meeting with management to explain the scope of the evaluation, evaluation methodology and method of reporting. Request for applicable supporting documents.

Day 2 – 25 Feb 2021 – Video conference

1300 DG(P&S) organisation
 Overview of Pakistan maritime education
 National provisions for seafarer training

Day 3 – 2 March 2021 – Video conference

1300 Quality management – policies and procedures, control of deficiencies, audits and reviews.
 Control and approval of maritime training institutes, courses and instructors.

Day 4 – 4 March 2021 – Video conference

1300 Control of communications.
 Control of use of simulators
 Control and approval of medical practitioners

Day 5 – 8 March 2021 – Video conference

1300 Issue of certificates, endorsements and revalidations
 Registration of certificates
 Revalidation of certificates
 Summary of findings and recommendations to date.

Day 6 – 18 March 2021 – Review of Training Institute – Seafarers Training Wing (Karachi) - Video conference

0900 Introductory meeting with management to explain the scope of the visit, evaluation methodology, method of reporting.

Day 7 – 22 March 2021 – Review of Training Institute - Maritime Training Institute (Karachi) - Video conference

1600 Introductory meeting with management to explain the scope of the visit, evaluation methodology, method of reporting.

**Day 8 – 24 March 2021 – Review of Training Institute Facilities-
Maritime Training Institute (Karachi)**

LR Surveyor travels to Training Institute

- 0900 Introductory meeting with management to explain the scope of the visit, evaluation methodology, method of reporting.
- Overview of Facility organisation, range of training courses and facilities.
- Tour of facilities relating to seafarer training, such as simulators (bridge, ECDIS, radio etc), engineering workshops, lifesaving, firefighting.
- 1300 Closing meeting with Institute management to present a summary of findings and recommendations.

**Day 9 – 24 March 2021 – Review of Training Institute -
Maritime Training Institute (Karachi) - Video conference**

- 1400 Overview of Institute organisation, range of training courses and facilities.
- Development and approval of training courses, including use of simulators
- Qualifications of instructors and assessors.
- Acceptance of students
- Monitoring and examination of students
- Issue and registration of certificates
- Quality Management, including handling of deficiencies, audits and reviews.
- 1630 Closing meeting with Institute management to present a summary of findings and recommendations.

**Day 10 – 25 March 2021 – Review of Training Institute –
Seaman Training Wing (Karachi) - Video conference**

- 1000 Overview of Institute organisation, range of training courses and facilities.
- Development and approval of training courses, including use of simulators
- Qualifications of instructors and assessors.
- Acceptance of students
- Monitoring and examination of students
- Issue and registration of certificates
- Quality Management, including handling of deficiencies, audits and reviews.
- 1300 Closing meeting with Institute management to present a summary of findings and recommendations.

**Day 11 – 29 March 2021 – Review of Training Institute Facilities -
Seaman Training Wing (Karachi)**

Surveyor travels to Training Institute

0900 Introductory meeting with management to explain the scope of the visit, evaluation methodology, method of reporting.

Overview of Institute organisation, range of training courses and facilities.

Tour of facilities relating to seafarer training, such as simulators (bridge, ECDIS, radio etc), engineering workshops, lifesaving, firefighting.

1300 Closing meeting with Institute management to present a summary of findings and recommendations.

Day 12 – 12 April 2021 – Review and Clarification – Video conference

1300 Discussions with management to review and clarify the findings and seek additional information where needed.

Appendix B Evaluation Team

B1. Adrian Broadbent

Adrian Broadbent	
Qualifications	Bachelor of Engineering (Naval Architecture) Chartered Engineer (UK) Fellow of the Royal Institution of Naval Architects Member, Chartered Quality Institute Registered Principal Auditor, IRCA, No. A000380
Experience in maritime administration	10 years' experience advising the Royal Australian Navy on interpretations of IMO Regulations. 2 years' experience as Lloyd's Register liaison officer with AMSA for regulatory issues on LR classed vessels.
Experience in training and assessment	30+ years' experience auditing quality, safety and environmental management systems, including ISO 9001 and the ISM Code. Audits included ship operating and ship managing companies and training organisations. 20 years' experience as a Lloyd's Register approved trainer for quality assurance and marine classification and statutory training courses.

B.2 Bazlur Rahman

Bazlur Rahman	
Qualifications	Batchelor of Engineering (Mechanical) from NED University Karachi, Batchelor of Engineering (Naval Architecture and Ocean Engineering) from University of Glasgow, UK. Life Member Pakistan Engineering Council.
Experience in maritime administration	Lloyd's Register - 15 years' experience dealing with the local Flag Authority on agreements, surveys and ISM&ISPS audits, including audits of Ship Management Companies. Pakistan National Shipping Corporation about 5 years' experience of assisting with audits for Flag State Auditors on PNSC vessels.
Experience in training and assessment	Lloyd's Register training courses on ISO 9001 lead auditor, ISM & ISPS including update courses on ISM & ISPS Audits. 10 years' experience in giving training to newly inducted Surveyors on ISM / ISPS Audits.

B.3 Tony Field

Tony Field	
Qualifications	<p>Master Mariner, Class 1, Unlimited HND in Nautical Science ISM / ISPS / MLC / ISO9000, 14000, 18000, 27000 Auditor & Trainer Human Factors Specialist</p>
Experience in maritime administration	<p>20 yrs seagoing experience 11 as Master 20+ years as Surveyor, Auditor, Senior Manager at Lloyd's Register Led LR Consultancy EMEA specialising in Shipping Company / Ports including restructuring company including the HR / Training requirements 2020 to date working with a ME Flag Administration to propose a re-write of the STCW due to the rapidly changing technology, automation and some vital tasks to be carried out remotely.</p>
Experience in training and assessment	<p>Designed and implemented the LR Marine Training for ISM, ISPS, MLC and Eliminating Sub Standard Shipping course programs. In cooperation with Warsash College (UK) set up and implemented the Marine Training Establishment Certification Scheme in 1997</p>

Appendix C Pakistan Legislation and Administrative Instruments

Rules

Process	National Provision
Examination and Certification of Masters, Deck Officers and Safe Manning	SRO 109, "Pakistan Merchant Shipping (Examination and Certification of Masters, Deck Officers and Safe Manning) Rules, 2005"
Examination and Certification of Marine Engineer Officers	SRO 110, "Pakistan Merchant Shipping (Examination and Certification of Marine Engineer Officers and Safe Manning) Rules, 2005"
Seafarer Service Book	SRO ??, "Pakistan Merchant Navy Seafarer Service Book Rules, 2020"
Hours of Work and Watchkeeping	SRO ??, "Merchant Shipping (Safe Manning, Hours of Work and Watch-keeping) Rules, 2021"
Medical Examinations	Merchant Navy (Medical Examination) Rules 2020. Copy available from Mercantile Marine website is undated.

Circulars

Process	National Provision
Requirements for Engineering Ratings	Circ 47/2000 Engine Room Watch Keeping Certificate for Ratings, STCW 1995 REGULATION III / 4 Issued 22 April 2000
Requirements for Engineering Ratings	Circ 02/2010 Engine Room Watch Keeping Certificate for Ratings, STCW 1995 REGULATION III / 4 Issued 22 Feb 2010
ECDIS Simulator Training	Circ 001/2012 Compliance with STCW Convention amendments (Manila Amendments). (ECDIS Simulator Training Requirements). Issued 19 Jan 2012
STCW Manila Amendments	Circ 002/2012 Compliance with STCW Convention amendments (Manila Amendments). Issued 19 Jan 2012

Process	National Provision
STCW Short Courses	Circ 004/2012 Compliance with STCW Convention amendments (Short Courses Syllabus). Issued 21 Feb 2012
Medical Fitness Examinations	Circ 004/2013 Revised medical fitness examinations form for seafarers in accordance with ILO/WHO D.2/ 1997 & STCW Reg I/9 and MLC Reg 1.2. Issued 2 Sept 2013
Training of Newly Inducted Surveyors	Circ ST 06/2020 Training of newly inducted surveyors of Ports & Shipping Wing and Mercantile Marine Department. Issued 4 February 2020
IGF Code, Polar Code and Passenger Ships	Circ 018/2020 Mandatory training requirements for serving on ships subject to the IGF Code, Ships Operating in Polar Waters, and Passenger Ships. Issued 16 June 2020

Internal Procedures

Process	National Provision
Programs for Modular, Simulator and Post-Sea Education and Training	“Mandatory Guidelines and Procedures to obtain approval from DG-P&S for Approved Modular, Simulator and Post-Sea Education and Training Programs for Deck and Engineer Officers”, effective date 30 June 2018.
Chief Nautical Surveyor Operating Activities	Chief Nautical Surveyor – SOP for Operating Activities, undated.

Appendix D Verification of Corrective Action on Findings

Item and Report Ref.	Description	Responsibility	Corrective Action	Evidence & Status



Contact person

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