

# COMPETENCE SHOULD BE THE CORE OF QUALIFICATIONS

The following is Keith Ingram's submission to Maritime New Zealand's Review of Qualifications and Operating Limits, based on extracts of many discussions with seafarers around our coast.

I write on behalf of a number of interest groups and individuals who now share my concerns that the direction of the QOL Review is changing now Bridget Carter has resigned from Maritime New Zealand.

First, we agree with the recognition of recreational sea time for entry-level seafarers, and the proposed structure of vessel size restrictions and type to enable seafarers to gain on-the-job experience prior to progressing.

We support the principle that competence should be at the core of the new framework and that required demonstrated skills should take precedent over time served on a vessel.

The system of building on threads appeals to us, and we support the ability to gain sea time in the area of working for the next limit or qualification, and of using training task books and a sea time record log to record time at sea, on watch and in what capacity.

This is especially important when progressing up the ladder and is particularly applicable to the Royal New Zealand Navy as a GTE. In this case there is a difference between sea time and time served on a ship, which might remain alongside for most of the year and the candidate is logging sea time.

In the case of watch-keeping, this time should be recorded in the individual's own record or log book, stating hours on watch and in what capacity and verified by either the OOW or the captain.

There is a need to recognise that the New Zealand Qualifications Authority examinations and assessments need to be overhauled to include qualified examiners who can examine candidates for the qualification and the certificate of competency.

The changes to operating limits are supported for the most part. However, we would like to point out that in recent times, changes have eroded the ability of some seafarers to operate where they might have in the past. Removing the extreme limit line is a case in point. As we progress, we must ensure no seafarer is disadvantaged by the change.

For the coastal and offshore limits we are now risk making the prerequisite sea time requirements too onerous. I don't believe Maritime NZ has considered this section of the industry properly. At present, gaining the prescribed sea time for nautical and engineering qualifications is both archaic and onerous - mostly in the "offshore industry", where individuals only serve six months at sea per year. A 28 days on-28 days off routine is pretty much the norm. It is largely driven by health and safety standards, particularly when it comes to fatigue.

For example, under figure Seven (page 36,) for a new entrant in our industry to get to the level of Master NO 500 - 3000gt, I understand it would take a minimum of 11 years in a structured environment and 18 years in the non-structured environment.

Even if that person worked in an industry sector whereby he or she remained at sea the entire time, it would take 5.5 years of qualifying sea time in the structured environment and nine years in

the non-structured environment.

These time frames exclude any shore-based training, which is certainly going to be part of the content of any of the career steps. Let's also not forget here that this person still only holds a "near coastal" certificate of competency.

I am mindful that over 95 percent of our vessels working in the passenger/workboat area of our coast are under 24m in length. Therefore it is important that both nautical and engineering qualifications and the prescribed sea time are balanced to recognise skills-based learning both on and off the job.

The inclusion of STCW-95 into the coastal limit is causing much consternation among operators. Clearly there is some confusion and I make the following comment in an effort to clarify the debate.

Currently, vessels of any size operating in enclosed waters are not regarded as seagoing. Likewise, all recreational, fishing and naval vessels are exempt, as are vessels under 20m, as these are not deemed to be ships under STEW requirements.

We have around 1500 New Zealand seafarers working offshore who rely on New Zealand maintaining IMO White List status. These seafarers have expressed concerns that the rest of the IMO world may not agree with our proposed classification of the 12-mile territorial limit as "closely adjacent to sheltered waters".

One solution for the most part is to tweak the vessel exemption size up to 24m, as they will be able to operate anywhere outside of STCW requirements.

At present, STCW-95 applies to all seagoing ships above 20m operating in waters beyond enclosed limits. In its review, Maritime NZ is trying to resolve this problem by suggesting the 12-mile territorial limit might fit.

This raises a number of questions where my comments on STCW may be different to Maritime NZ's own understanding.

Article III of the STCW Convention states which ships STCW applies to.

Article II (g) then defines seagoing ship.

Regulation I/1 1.13 of the convention defines near-coastal voyages.

Regulation II/3 for ships of less than 500gt, paragraphs three to seven refer to near-coastal voyages and include the important exemption provisions of paragraph seven.

For your information, I am advised that Australia has notified the IMO that its near-coastal limits are the area of its exclusive economic zone which is 200 miles, except where it is reduced to half way to the countries to the north of them from the main continent of Australia.

I note that STCW does not mention a minimum ship size. I also note that within the STCW criteria there is a lot of flexibility for individual countries to set their own requirements without jeopardising their own IMO White List status.

Therefore it is now timely for us to consider New Zealand's position during this review. I believe we need to seriously consider the impact of John Mansell's suggestions during the "road show" to include STCW as a requirement to operate in the coastal limit or even further afield within New Zealand's exclusive economic zone, or EEZ.

I have no difficulty encouraging those who are seeking transportability of qualifications and recognition with other nations, SOLAS ships or IMO White List status to study for and hold

STCW for those New Zealand seafarers working offshore. But I do have significant difficulty with Maritime NZ now considering making it a retrospective requirement using the change of limits as an excuse.

I need not remind Maritime NZ that when one considers the miles travelled, passengers carried and tonnages either transported or caught at sea, our industry has a better than “mediocre safety record” as portrayed by Maritime NZ and I remain doubtful that the inclusion of STCW will improve this.

Instead of using a prescriptive limit, if we adopt an approach that vessels under, say, 24m are not classed as ships under IMO STCW requirements, we can set whatever rules we like.

It is worthwhile remembering that 80 percent of the domestic fleet in safe ship management is under 15m registered length, so now you can see the angst to operators and the full scope of the issue and the problems such proposed changes will make.

We do not need big ship thinking from Maritime NZ officials to be allowed to dictate or prescribe what we require for the domestic fleet on our coast. We must remain at all times cognisant of the simple philosophy of our vessels being fit for purpose.

Increasing the domestic vessel size to 24m would remove 98 percent of the New Zealand inshore fleet from IMO scrutiny and not affect our White List status. Operators and Maritime NZ could then decide on the most appropriate certificates and manning levels in our coastal limits.

For example, vessels under 24m were not classified as a ship under the IMO, STCW and the engineering requirements would not be required within our coastal waters. MEC4, while not part of the STCW 95, still requires engineers to accumulate offshore sea time, which requires STCW training. So why is it being prescribed for our vessels? This should leave the opportunity for the industry

and Maritime NZ to consult and develop suitable qualifications.

Training providers have advised me they do not want to see the restricted limits shipping sector on our coast having to do any more training than is appropriate for their vessel’s operations.

Sadly, Maritime NZ was noticeably absent at the recent Manila diplomatic conference on the STCW, which adopted a number of key amendments known as STCW-10. The review included seven meetings over five years, with Maritime NZ staff attending the first two before withdrawing. Who was looking after our interests at this important forum?

Yes, there are issues with some of our coastal vessels over 24m. However, as a tanker, the *Awanuia* must comply with STCW. Likewise, Black Robin Shipping, which services the Chatham Islands, some 360 miles offshore, should comply. As for the others, maybe they should comment.

The real issue facing our industry will be dealing with the increased cost of regulatory and compliance training, and that the government has just withdrawn funding for many of our essential courses of less than five weeks (20 credits). We were not consulted on this and must ask: what is Maritime NZ doing about this important issue within the current review?

Unless funding is restored, coastal career paths for seafarers will be curtailed or severely restricted, meaning the restricted limits shipping industry will either now have to fund most of the training itself or poach from other sectors, which does not bode well for encouraging young people into our industry.

We are facing a manning crisis as older hands retire, with a lack of fresh faces to take over the helm from them. Poaching staff from other companies is no longer sustainable. The industry is looking to Maritime NZ and this review to establish logical career paths to encourage young people to go to sea on our coast as a career. 🚢

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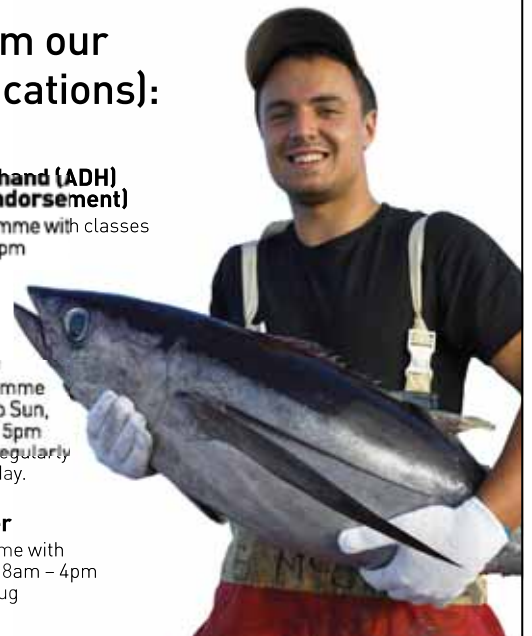
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