

### THE PHASING OUT OF THE “PRE-SEA TRAINING” COURSE, AND CLARITY ON INITIAL TRAINING REQUIREMENTS FOR ALL SEAFARERS

ALL SEAFARERS, SHIP OPERATORS, ACCREDITED INSTITUTIONS, EXAMINERS, PRINCIPAL OFFICERS AND OTHER INTERESTED AND AFFECTED PARTIES

ISSUE DATE	22 December 2021	EXPIRY DATE	21 December 2022 or unless withdrawn	REFERENCE	SM6/5/2/1/MIN
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#### Marine Information Notice's and /or Marine Notice's affected

<i>Cancelled or superseded:</i>	None	<i>Read in conjunction with:</i>	None
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#### SUMMARY

This Marine Information Notice aims to provide clarity on types of initial training and familiarisation required of seafarers in the South African context, and the phasing out and replacement of the “Pre-Sea Training” course

#### What is *Safety Familiarisation*? (STCW Section A-VI/1 para 1)

1. Safety Familiarisation is the familiarisation required to take place onboard when a seafarer joins a vessel in order to orientate the seafarer with the safety aspects of the particular vessel they are joining. Such familiarisation takes place on board in accordance with STCW Section A-VI/1, before being assigned shipboard duties.
2. The application of the above requirement for all vessels was found in Regulation 1(1) and in Regulation 1(4) of the repealed MS (Safe Manning, Training and Certification) Regulations 2013, as amended:

*(1) 'familiarisation training' means on-board training to familiarise the seafarer with his/her duties and responsibilities with respect to safety, security and pollution prevention;*

*(4) All seafarers shall have completed on-board safety familiarisation training before being assigned shipboard duties.*

#### What is *Basic Training*? (STCW Section A-VI/1 para 2)

3. Basic training is a requirement for seafarers in terms of the STCW convention under Section A-VI/1. The components are described as follows:
  - 3.1. Personal Survival Techniques
  - 3.2. Fire Prevention and Fire Fighting
  - 3.3. Elementary First Aid
  - 3.4. Personal Safety and Social Responsibility

#### What is *Basic Safety Training*? (STCW-F Chapter III)

4. “Basic Safety Training for all fishing vessel personnel” comprises of the following areas International Convention on Standards of Training, Certification and Watchkeeping for Fishing Vessel Personnel, 1995, as amended (STCW-F Convention).
  - 4.1. personal survival techniques, including donning of lifejackets and, as appropriate, immersion suits;
  - 4.2. fire prevention and fire-fighting;
  - 4.3. emergency procedures;
  - 4.4. elementary first aid;
  - 4.5. prevention of marine pollution; and

4.6. prevention of shipboard accidents.

*NOTE: The above competencies are fulfilled by the same courses required for STCW Basic Training.*

**What is Small Vessel *Safety Induction Training*? [MS (NSVS) Reg 14]**

5. This is required for all Small commercial vessels going to sea which fall under the MS (National Small Vessel Safety) Regulations, 2007, for vessels under 25GT. It is variously also referred to as “Pre-Sea’ or “Safety Familiarisation’ for Small Vessels. Reference Part 3, *Reg 14 Par 3(a)*:

*(3) The owner of a commercial vessel going to sea must, in addition to meeting the requirements of sub regulations (1) and (2), ensure that —*

*(a) the skipper and every crew member on the vessel hold documentary evidence of having successfully completed approved safety induction training;*

**What is *Pre-Sea Training* and who is required to attend? [MSA Reg 102(1)]**

6. Pre-Sea Training (Familiarisation training required **before** joining a ship) has been a requirement of the Merchant Shipping Act, 1951, as amended, since its promulgation. The application is for all vessels of 100 GRT or more and requires that:

*“102. (1) The master of every South African ship **of more than one hundred gross register tons shall, and the master of every other South African ship may,** enter into an agreement (in this Act called the agreement with the crew) with every seaman whom he engages to serve in that ship: Provided that the proper officer may refuse to allow the engagement of a seaman —*

*(a) who has not **completed any period of pre-sea training** that may be prescribed...”*

And the amendment of 2015 to the Act broadened the application as follows:

*“(1) The master **of every South African ship shall** enter into an agreement on behalf of the employer (in this Act called the agreement with the crew) with every seafarer whom the master engages to serve in that ship: Provided that the proper officer may refuse to allow the engagement of a seafarer —*

*(a) who has not **completed any period of pre-sea training** that may be prescribed...”*

This requirement was met by attending either of the following courses found in the SAMSA Code\*:

- 6.1. Pre-Sea Training (also referenced as Safety Familiarisation in the SAMSA Code)
  - 6.2. Personal Survival Techniques (per STCW or the STCW-F Convention standards)
7. The training referred to in para. 6.1 was intended to meet the requirement of the Act, but in application is not the same as required by STCW A-VI/1 - onboard Safety Familiarisation.
8. The repealed Merchant Shipping (Safe Manning, Training and Certification) Regulations 2013, as amended, defined Pre-Sea Training as:

*“...once-off mandatory approved training for all seafarers prior to their first employment on a fishing vessel to which these Regulations apply”*

9. The same regulations - in Regulation 91(1) - required that:

*“(g) all seafarers employed on fishing vessels shall have completed approved pre-sea training;”*

*(\*The SAMSA Code is progressively being revised to the new Training Standards Code)*

## Conclusions

10. In order to comply with the requirements in place since the MS (Safe Manning, Training and Certification) Regs, 2013, it is necessary to align the means of compliance to the requirements of Section 102(1)(a) of the Act - with training that has a broader and more efficient application i.e. Personal Survival Techniques. The now adopted Merchant Shipping (Training, Certification and Safe Manning) Regulations, 2021, gives effect to this.
11. Since the new Merchant Shipping (Training, Certification and Safe Manning) Regulations, 2021 have been gazetted, continuation of Pre-Sea Training for Fishers will be aligned to the dates of the Transitional Arrangements – regulation 125. From 1<sup>st</sup> July 2022, Pre-Sea Training for Fishers at accredited institutions will cease, and the new requirements will apply.
12. In the new 2021 regulations, any Fishing Vessel Personnel who are not assigned safety or pollution prevention duties, or who are not directly involved in the safe operation of the vessel – such as factory workers – a minimum of PST will be required. No personnel onboard involved in the business of the vessel should be without training in Personal Survival Techniques.
13. Ship specific onboard Safety Familiarisation is still required each time any seafarer joins a vessel other than a “Small Vessel” [MS (National Small Vessel Safety) regulations, 2007].
14. The issuance of Seafarer Record Books previously required either Pre-Sea training or Personal Survival Techniques as part of the application. From the time Pre-Sea Training courses are no longer available, Personal Survival Techniques will continue to be accepted.

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