



2022 PHILIPPINE **RESPONSE**

THE PHILIPPINES' STRATEGIC CORRECTIVE ACTIONS
in raising the country's maritime standards
in compliance with the STCW Convention



THE MARITIME INDUSTRY AUTHORITY (MARINA) IN THE PHILIPPINES WAS CREATED ON 01 JUNE 1974 AS AN ATTACHED AGENCY TO THE OFFICE OF THE PRESIDENT (OP) WITH THE ISSUANCE OF PRESIDENTIAL DECREE NO. 474, OTHERWISE KNOWN AS THE MARITIME INDUSTRY DECREE OF 1974, TO INTEGRATE THE DEVELOPMENT, PROMOTION AND REGULATION OF THE MARITIME INDUSTRY IN THE COUNTRY. WITH THE CREATION OF THE MINISTRY (NOW DEPARTMENT) OF TRANSPORTATION AND COMMUNICATIONS (DOTC) BY VIRTUE OF EXECUTIVE ORDER NO. 546, THE MARINA WAS ATTACHED TO THE DOTC FOR POLICY AND PROGRAM COORDINATION ON 23 JULY 1979.

IT ENVISIONS ITSELF TO BE A GLOBALLY COMPETITIVE MARITIME INDUSTRY.

ITS MISSION IS TO LEAD A PROGRESSIVE MARITIME ADMINISTRATION FOR SAFER PEOPLE, SAFER SHIPS, AND CLEANER ENVIRONMENT.

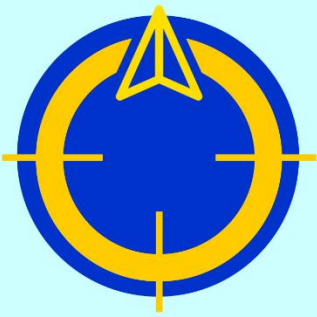
PHILIPPINE



RESPONSE

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LIST OF ACRONYMS

AC	Assessment Center
AIS-SART	Automatic Identification System - Search and Rescue Transporter
AMP	Annual Monitoring Program
ARPA	Automatic Radar Plotting Aids
BIT	BIT International College
BMA	Baliwag Maritime Academy
BOE	Board of Examiners
BSMarE	Bachelor of Science in Marine Engineering
BSMT	Bachelor of Science in Marine Transportation
CEB	CHED Commission en banc
CeC	Cristal E-College
CHED	Commission on Higher Education
CHED-OPSD	Commission on Higher Education - Office of Programs and Standards Development
CMO	CHED Memorandum Order
CoC	Certificate of Competency
COLREGs	Collision Regulations
CoP	Certificate of Proficiency
CTO	Company Training Officer
DBM	Department of Budget and Management
DJWD	Daily Journal of Watchkeeping Duties
DTS	Detailed Teaching Syllabus
e-TRB	Electronic Training Record Book
ECAR	European Commission Assessment Report
ECDIS	Electronic Chart Display and Information System
EMSA	European Maritime Safety Agency
EPIRB	Emergency Position Indicating Radio Beacon
ETO	Electro-technical Officer
EU	European Union
GMDSS	Global Maritime Distress and Safety System
GOLD	Gregorio Oca Leadership and Development Foundation
GT	Gross Tonnage
IAMU	International Association of Maritime University
IMDG Code	International Maritime Dangerous Goods Code
IMO	International Maritime Organization
IMSBC Code	International Maritime Solid Bulk Cargoes Code
IMPACTS	Integrated Maritime Practical Assessment Center & Technical Solutions
ITCP	Integrated Technical Cooperation Program
JBLFMU	John B. Lacson Foundation Maritime University

JCMMC	Joint CHED-MARINA Memorandum Circular
KUP	Knowledge, understanding and proficiency
kW	kilowatts
MARCOM	Maritime Communications
MARINA	Maritime Industry Authority
MARTI	MARINA Training Institute
MEL	Monitoring, Evaluation and Learning
MEP	Maritime Education Program
MET	Maritime Education and Training
MHEI	Maritime Higher Education Institution
MIDP	Maritime Industry Development Plan
MISMO System	MARINA Integrated Seafarers Management Online System
MTI	Maritime Training Institution
NMAE	National Maritime Admission Examination
Nm	Nautical miles
OBMI	Outcomes-Based Monitoring Instrument
OBT	Onboard Training
OEW	Officer in charge of an engineering watch
OLFU	Our Lady of Fatima University
OOW	Officer in charge of a navigational watch
OSSP	Organizational Structure and Staffing Plan
OTG	Onboard Training Guidance
OTO	Onboard Training Office
OTS	Onboard Training Supervisor
PCG	Philippine Coast Guard
PMI	PMI Colleges, Bohol
PMMA	Philippines Merchant Marine Academy
PMMS	Philippine Merchant Marine School
PNTC	PNTC Colleges, Inc.
PROTECT	Protect Marine Deck and Engine Officers of the Philippines
PSG	Policies, Standards and Guidelines
QMS	Quality Management System
QPR	Quality Procedure
QSS	Quality Standards System
SART	Search and Rescue Transponder
SMS	Safety Management System
SOLAS Convention	The International Convention for the Safety of Life at Sea
STCW Convention	The International Convention on Standards of Training, Certification and Watchkeeping for Seafarers 1978, as amended
STCW Code	The Seafarers' Training, Certification and Watchkeeping Code





FOREWORD

The International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW Convention) 1978, as amended established a set of internationally accepted standards focusing on the human element of shipping, which covers the mandatory education and training, certification, and watchkeeping for seafarers. As a party to the Convention, the Philippines is committed to fully comply with this international regulation. Doing so enables the Philippines to play a significant role in the global maritime industry as a major source of competent and highly-valued seafarers. The recognition by the European Commission of the certificates of competency (CoC) of Filipino marine officers is very important to the Philippines as it enables their employment onboard EU-flagged vessels.

This report, *Philippine Response to the European Commission's Identified Deficiencies of the Maritime Education and Training, and Certification System of the Republic of the Philippines Regarding the STCW Convention*, is a proof of the Philippines' continuing commitment and determination to achieve full compliance with the STCW Convention through the measures it has undertaken to address the findings contained in the European Commission Assessment Report (ECAR). It shows not only the significant progress the country has made since EMSA's first audit in 2006 but also the country's strong commitment to sustain this progress. The Maritime Administration considers ECAR's findings as valuable inputs for the continuing improvement of the country's maritime education and training, and certification system. ↴



EXECUTIVE SUMMARY

The EC Assessment Report noted nine Shortcomings and twenty-three Grievances in the country's system of maritime education and training, and certification system. This *Philippine Response* presents the measures which the Philippines has implemented to redress the ECAR's findings as well as those that it will put in place to sustain these reforms. These reforms include both short-term and long-term measures covering policies, standards, and guidelines and their manner of implementation. The measures include strategic initiatives, supported by factual evidence, and are presented with a precise calendar of their adoption and entry into force. On the basis of the *Philippine Response*, the Committee on Safe Seas and the Prevention of Pollution from Ships (COSS) will decide through its Committee on Safe Seas on the continued recognition of Philippine-issued STCW Certificates to Filipino seafarer officers.

This *Philippine Response* is divided into four parts. Part I provides a synthesis discussion of the major initiatives MARINA has undertaken to support the measures contained in this report. Part II provides the detailed explanation of the specific measures that the Philippines has undertaken and intends to undertake to address the grievance and specific findings noted in the ECAR, including definite timelines, as well as factual evidence. Part III serves as this Report's conclusion, reflecting on the most appropriate way of approaching the challenges confronting the Philippine maritime education and training, and certification system. Finally, Part IV identifies another set of major initiatives that the Philippine authorities intend to undertake in the immediate future to further strengthen the Philippine maritime education and training, and certification system. ↴



INTRODUCTION

The letter 'O' in the word 'INTRODUCTION' is highlighted with a yellow circular target symbol, consisting of a central dot and a surrounding ring.

The European Commission (EC), through the European Maritime Safety Agency (EMSA), re-assessed the Philippines' maritime education and training, and certification system between 24 February and 12 March 2020. The EMSA conducted an inspection of the activities and processes of the Maritime Industry Authority (MARINA), as the Maritime Administration, the Commission on Higher Education (CHED), as well as eleven (11) Maritime Higher Education Institutions (MHEIs) and three (3) MTIs/ACs. On 01 March 2021, the Philippines received EMSA's Final Inspection Report on the country's level of compliance with the STCW Convention. On 20 December 2021, the MARINA received the ECAR on the findings of the EMSA in their 2020 inspection mission to the Philippines.

As soon as the EMSA completed its inspection on 12 March 2020, CHED and MARINA initiated a series of activities to identify critical issues confronting the Philippine maritime education and training, and certification system. They conducted regular consultations and workshops with maritime stakeholders to ensure transparency and facilitate cooperation and support from them. The involvement of these stakeholders was deemed crucial to the success of efforts to arrive at measures that would help the Philippines achieve STCW compliance.

On 12 July 2020, the MARINA constituted a Task Group to come up with comprehensive (immediate and long-term) solutions that can address the identified shortcomings. The Task Group was composed of personnel from various Divisions of the MARINA-STCW Office, and representatives from CHED and maritime stakeholders. It was tasked to identify and formulate measures on the following key areas:

- A. Program and course design, review and approval
- B. Monitoring, supervision and evaluation of training and assessment
- C. Examination and assessment of competence
- D. Availability and use of training facilities and simulators
- E. Onboard Training
- F. Issue, revalidation and registration of certificates and endorsements

The MARINA conducted **root cause analysis workshops** to identify the fundamental underlying causes of the issues. In partnership with CHED, the MARINA facilitated a **hand-holding workshop** on 17 February 2021 to assist the MHEIs, especially the eleven (11) which were visited by the EMSA, in the formulation of appropriate corrective actions to address the perceived findings. This was followed by two (2) **consultative workshops** on 11-12 March 2021 and 22 April 2021 with almost five hundred (500) representatives from maritime institutions, training centers, assessment centers and licensed manning agencies. These were intended to solicit the stakeholders' inputs on how the corrective actions can be improved to ensure that the shortcomings identified by EMSA would be fully addressed. The recommended action plans presented during the workshops and the comments and reactions gathered from the Reactors/Panelists were discussed and evaluated by the Task Group to determine which among the recommendations could be incorporated in the initial action plan. Further, an **assessment survey** assessing the quality and appropriateness of the proposed corrective measures was conducted among maritime stakeholders.

After receiving the ECAR on 20 December 2021, the MARINA conducted another round of **consultations with stakeholders** on 29 December 2021. The Task Group resumed its work on corrective measures formulation and with the drafting of this report on 05 January 2022. The Task Group completed its work on 02 March 2022.

This Philippine Response to the ECAR contains the measures which the country has, and will, put in place, including the timeline of implementation. The Maritime Administration recognizes that these measures must be supported and sustained by capacity building programs that will enhance and strengthen the institutional competencies of the Philippine authorities involved in the implementation of the maritime education and training, and certification system. ⚓



PART I
STRATEGIC INITIATIVES

This report recognizes that there are issues to be addressed at the level of the individual, the institution, and the system. Therefore, MARINA has undertaken major initiatives to support the measures contained in this report. These are discussed in the following.

A. Completion of New Policies, Standards and Guidelines for BSMT and BSMarE Programs

The CHED-MARINA issued the revised Policies, Standards and Guidelines covering the BSMT and BSMarE programs (JCMMC No. 01, s. 2022). The new PSGs prescribe the new standard course packages which will ensure that all required competences under the STCW Code are met. Further, the new guidelines in the conduct of the Onboard Training Program provides detailed instructions on how the MHEIs will supervise and monitor the cadet's performance of the required watchkeeping duties. Moreover, the new PSG provides for a systematic and rationalized system for the determination of carrying capacity to ensure that MHEIs have the right number of enrollees based on their available resources, to guarantee the effective delivery of the education program. This new system is now binding on the part of the MHEIs and legally enforceable on the part of the Administration. (Attachment 01 - JCMMC No. 01, s. 2022)

In addition, the revised Guidelines on the Joint CHED-MARINA evaluation and inspection of Higher Education Institutions applying for government authority to operate BSMT and/or BSMarE program/s (JCMMC No. 02, s. 2022) and the revised Guidelines on Joint CHED-MARINA monitoring of BSMT and BSMarE Programs (JCMMC No. 03, s. 2022) provide an enhanced system to ensure that education programs are structured in accordance with the requirements of the STCW Convention and that appropriate mechanisms are in place for better supervision and monitoring of MHEIs. (Attachment 02 - JCMMC No. 02, S-2022, Attachment 03 - JCMMC No. 03, S-2022)

B. Phase-out of 11 Maritime Programs of 7 MHEIs

The CHED approved the recommendation of MARINA, through the Technical Panel for Maritime Education (TPME), to phase out 11 MEPs of 7 MHEIs. The seven (7) MHEIs with MEP for phase-out are the following:

1. BSMT and BSMarE of University of Northeastern Philippines (Iriga City, Camarines Sur);
2. BSMT and BSMarE of BIT International College (Tagbilaran City, Bohol);
3. BSMT and BSMarE of Zamboanga del Sur Maritime Institute of Technology - (Pagadian City);
4. BSMT of Mindanao Polytechnic College, Inc. - (General Santos City);
5. BSMarE of Asian Institute of Maritime Studies - (Roxas Boulevard, Pasay City);
6. BSMT and BSMarE of Palawan Polytechnic College, Inc. (Puerto Princesa City, Palawan); and
7. BSMT of Surigao Education Center - (Surigao City, Surigao).

The phase-out of the above programs was a result of the strict monitoring conducted by CHED-MARINA in 2018 and the strict implementation of the policies, standards and guidelines provided in CHED Memorandum Order (CMO) No. 67, series of 2017. This was made pursuant to the JCMMC No. 01, series of 2018. (Attachment 04-A - CHED's Notices on Phasing out of BSMT and BSMarE programs of relevant MHEIs)

Since these MHEIs still have existing Second and Third year students allowed to finish the program, CHED-MARINA have prioritized them for monitoring as reflected in the approved Annual Monitoring Program for CY 2022.

Moreover, the stringent evaluation process for the approval of the opening of new programs resulting from the strict implementation of JCMMC No. 02, series of 2019 led to the disapproval of the application for BSMT and BSMarE programs of five (5) applicants for the year 2021. (Attachment 04-B - Letter of CHED to MHEIs disapproving MHEIs application)

C. Imposition of a Five-Year Moratorium on the Opening of New BSMT and BSMarE Programs

The CEB approved (CEB Resolution No. 111-2022) on the recommendation of the TPME to impose a moratorium for 5 years on the opening of new BSMT and BSMarE programs. The decision was based on the wide gap between the number of enrollees and the number of graduates, indicating the need to control the supply of maritime students. MARINA believes that a moratorium is a needed policy complement to the strict implementation of the policy on the phasing-out of non-compliant existing maritime education programs. (Attachment 05 - TPME Resolution No. 08, s. 2022)

D. Institutionalization of the National Maritime Admission Examination (NMAE)

To guarantee that the maritime sector gets the best and the brightest among the pool of potential Filipino seafarers, the CEB has approved the institutionalization of the conduct of the National Maritime Admission Exam (NMAE) as recommended by the TPME. (Attachment 06 - TPME Resolution No. 04, series of 2022 creating a TWG to Study the institutionalization of the NMAE)

The implementation of NMAE will allow the administration to set a quota on the number of students that may be allowed to enroll in the recognized MHEIs. The quota system will be an effective tool in ensuring that MHEIs are accepting the number of enrollees based on their carrying capacity.

E. Updated Outcomes-Based Monitoring Instrument for Maritime Education Programs (MEPs) Offered by MHEIs

CHED-MARINA reviewed and revised the Outcomes-Based Monitoring Instrument (OBMI) for Maritime Education Programs annexed to JCMMC No. 03, S-2022 by incorporating clear outcomes per key area of monitoring and by providing objective evidence to determine whether the defined outcomes are achieved. The identified objective evidence in the OBMI will minimize subjectivity in determining compliance. This will facilitate a more standard approach in the conduct of joint monitoring. (Attachment 03-E - OBMI)



F. Revised Training Standards of MTIs

The MARINA reviewed and revised the training standards for the Refresher course on Personal Survival Techniques, Refresher course on Fast Rescue Boat and Regular Course on Personal Survival Techniques in order to ensure that all the relevant KUPs in the STCW Code are sufficiently covered. In order to familiarize the MTIs and to facilitate better implementation of and compliance with the revised training standards, the MARINA conducted virtual orientation to stakeholders. (Attachment 07 - MARINA Advisory No. 2021-21)

G. Revised System of Accreditation of Assessment Centers

To ensure that the conduct of practical assessment is undertaken by institutionally competent assessment centers, guarantee the integrity of assessment procedures, and strengthen compliance with the relevant provisions of the STCW Convention, MARINA instituted a two-stage process of accrediting and approving Assessment Centers. The first stage requires that only institutions established for the purpose of conducting assessment duly registered under the Securities and Exchange Commission (SEC) or Department of Trade and Industry (DTI) may be accredited as assessment centers (Attachment 08 - MARINA Memorandum Circular No. SC-2021-08). The second stage requires that accredited ACs that will be approved to conduct assessment, on behalf of the Administration, have established organization, policies and procedures, facilities and equipment and other essential requirements to ensure the delivery of quality assessment of competence for issuance of STCW Certificates. This is for approval of the MARINA Board within March 2022.

H. Development and Implementation of Guidelines for the Onboard Training of Cadets on Philippine-registered Ships Engaged in Domestic Shipping

The Guidelines for the Onboard Training of cadets on Ships engaged in domestic trade clearly defines the responsibilities and accountabilities of MHEIs, (Onboard Training Supervisor) and the Shipping Company (Company Training Officer, Master of ship, and Shipboard Training Officer/Qualified Officer) in ensuring that the cadets receive appropriate and structured practical training while onboard ships. The guidelines also specify the responsibility of the cadets particularly with respect to accomplishing the Training Record Book (TRB), the Daily Journal of Watchkeeping Duties (DJWD) and gathering objective proof of having undertaken the practical exercise. (Attachment 09 - MARINA Memorandum Circular No. SC-2022-01)

The MARINA Memorandum Circular No. SC-2022-01, series of 2022 is supplementary to Annex H of JCMMC No. 01, s. 2022 and aims to ensure that the OBT program conducted in domestic ships are properly supervised and monitored, in order for the cadets to receive structured practical training and experience as required by the STCW Convention. It also provides the parameters in the acceptance of cadets and the instructions on how to properly document the tasks completed by the cadet.

I. Revised Format for Certificate of Competency (CoC) and Certificate of Proficiency (CoP)

To ensure that the conduct of practical assessment is undertaken by institutionally competent assessment centers, guarantee the integrity of assessment procedures, and strengthen compliance with the relevant provisions of the STCW Convention, MARINA instituted a two-stage process of accrediting and approving Assessment Centers. The first stage requires that only institutions established for the purpose of conducting assessment duly registered under the Securities and Exchange Commission (SEC) or Department of Trade and Industry (DTI) may be accredited as assessment centers (Attachment 08 - MARINA Memorandum Circular No. SC-2021-08). The second stage requires that accredited ACs that will be approved to conduct assessment, on behalf of the Administration, have established organization, policies and procedures, facilities and equipment and other essential requirements to ensure the delivery of quality assessment of competence for issuance of STCW Certificates. This is for approval of the MARINA Board within March 2022.

J. IMO Capacity Building Workshop on Examination and Assessment, and Curriculum Development

The MARINA requested the International Maritime Organization (IMO), through the IMO Integrated Technical Cooperation Program (ITCP), for the conduct of a 3-tiered program to capacitate CHED and MARINA personnel and other stakeholders with the knowledge to improve policies and processes relating to STCW implementation.

In response, a Scoping Exercise was conducted by the IMO in April 2021, followed by a course on assessment and examination of seafarers conducted in the months of September and October 2021, and the third phase is a training on principles of curriculum development conducted in December 2021 and January 2022 (Phase 1 - Attachment 12, Phase 2 - Attachment 13, Phase 3 - Attachment 14). Further capacity building needs and requests to access technical assistance is being coordinated with the IMO Technical Cooperation Division (TCD) as the Philippines pursues short-term and long-term plans to build up capacity to effectively implement the STCW Convention and Code.

K. New MARINA Organizational Structure and Staffing Plan (OSSP)

In order to enhance the institutional capacity of MARINA to better perform its administrative functions, the MARINA Board approved the proposal for the creation of new personnel positions in the MARINA Central and Regional Offices from the current 815 to 2,167. The hiring of personnel for the new positions will be done in tranches over a period of three years. This will enhance the manpower complement of the STCW Office.

(Attachment 73 - MARINA Board Resolution No. 2021-04-01, series of 2021)

L. Implementation of the MIDP and MARINA Voyage Plan

In order to ensure that the problems at the levels of the individual, institution, and system are sufficiently addressed and to sustain the effective implementation of the measures aimed at addressing the vital issues confronting the Philippine maritime education and training, and certification system, the MARINA has instituted a long-term plan, The Maritime Industry Development Plan (MIDP), a 10-year plan which sets the overall direction towards achieving a nationally-integrated and globally-competitive Philippine maritime industry by 2028. The policies of MARINA and other government agencies involved in maritime industry development will be guided by the 10 priority programs of the MIDP aimed at strengthening various areas such as domestic shipping, maritime security, maritime safety and maritime professionals. These priority programs include a comprehensive program dedicated to ensuring the competitiveness of Filipino seafarers through the delivery of STCW-compliant maritime education and training, and certification system.

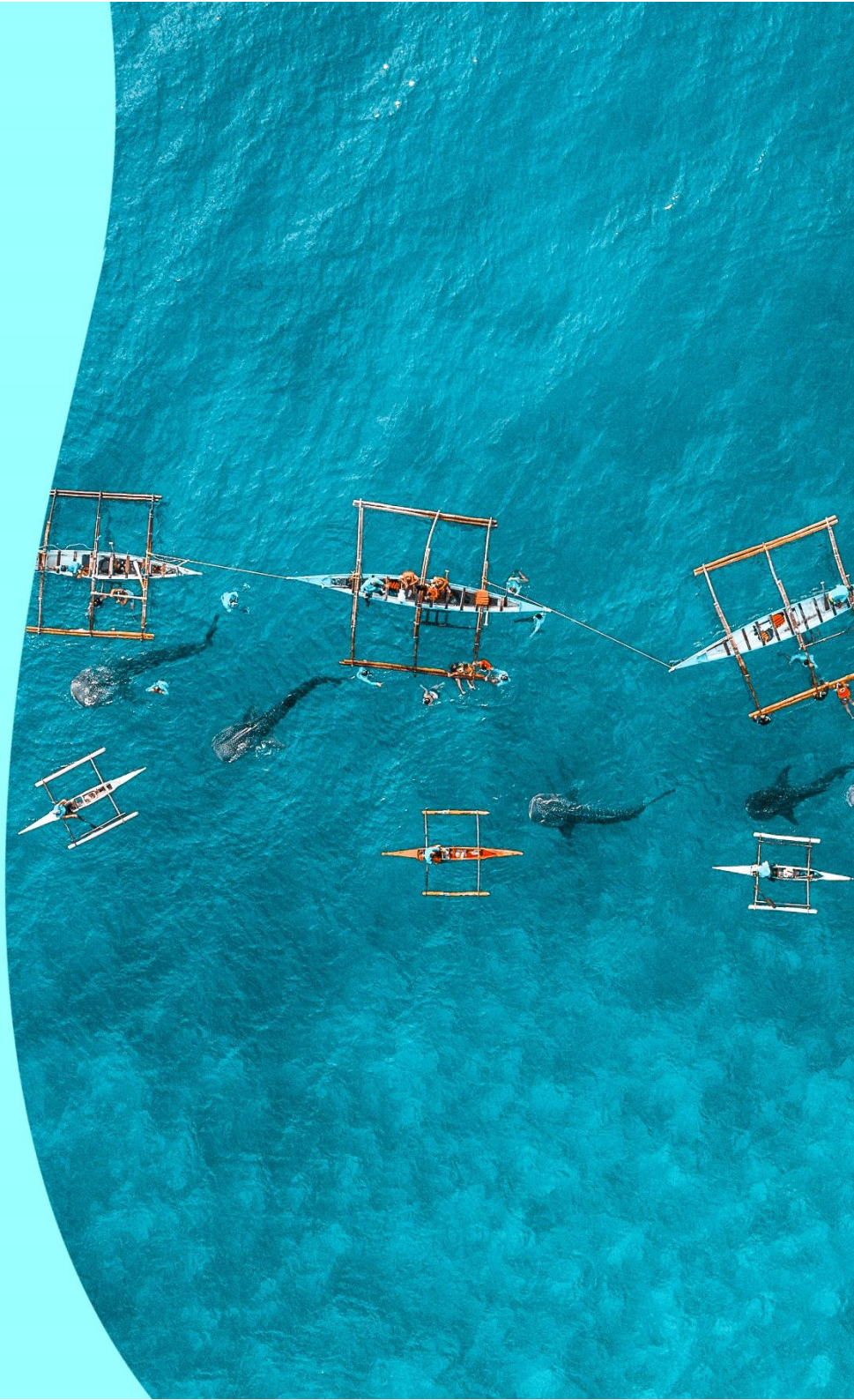
From the MIDP, the MARINA carved-out a Voyage Plan, a six-year plan (2022 to 2028) aimed at accelerating the integration and rational development of the Philippine maritime industry by enhancing good governance in both infrastructures and systems. Finally, the Voyage Plan provides for policies and measures that will strengthen the regulatory capacity of MARINA, particularly with respect to its function as the Single Maritime Administration in the implementation of the STCW Convention.

M. Updating of the Quality Standards System (QSS)

The CHED and MARINA continuously update their respective QSS Manuals in order to reflect any changes in the policies, standards and guidelines. This will include the review and revision of quality procedures and appropriate forms used in the process.

N. Conduct of the Independent Evaluation

Within March 2022, the Administration will undergo an Independent Evaluation as required by Regulation 1/8 of the STCW Convention. This will further help the Administration to identify areas for improvement and ensure that all applicable provisions of the STCW Convention and Code are governed by its QSS.



2022
PHILIPPINE
RESPONSE

PHILIPPINE RESPONSE TO THE EUROPEAN COMMISSION'S
IDENTIFIED DEFICIENCIES OF THE MARITIME EDUCATION
AND TRAINING, AND CERTIFICATION SYSTEM
OF THE REPUBLIC OF THE PHILIPPINES REGARDING
THE STCW CONVENTION







PART II
PHILIPPINE RESPONSE
TO THE EC ASSESSMENT
REPORT

DIAGRAM OF AUDIT COMPONENTS



There are six (6) Key Areas, nine (9) Shortcomings, twenty-three (23) Grievances, and three (3) Specific Findings.

Key Area 1 has three (3) shortcomings, six (6) grievances, and three (3) specific findings. Under the first shortcoming, are two (2) grievances. The second grievance is divided into three (3) specific findings.

Key Area 2 has one (1) shortcoming and four (4) grievances.

Key Area 3 has one (1) shortcoming and three (3) grievances.

DIAGRAM OF AUDIT COMPONENTS



Key Area 4 has one (1) shortcoming and two (2) grievances.

Key Area 5 has one (1) shortcoming and six (6) grievances.

Key Area 6 has two (2) shortcomings with one (1) grievance each.

KEY AREA ONE

**PROGRAMME AND
COURSE DESIGN,
REVIEW AND APPROVAL**

Maritime Administration

Programme and course design, review and approval

SHORTCOMING 1

*The Philippines' authorities do not ensure that the **education and training is structured in accordance with written programmes, and included the methods and media of delivery, procedures, and course material as necessary to fully achieve the prescribed standards of competence, as required by the STCW Convention and Code.***

The review/evaluation of the program and course design, review and approval identified several grievances. In particular:

Grievance 1

Insufficient design of Maritime Education and Training (hereafter - MET) programmes for certification of masters and officers

At the time of the EMSA inspection, MARINA and CHED had not yet completed the design of the “programs of study” for BSMT and the BSMarE programmes, which were still under discussion, and had developed only draft course specifications for the first academic year of the programmes. **Therefore, the “programs of study” for the BSMT and the BSMarE are not structured in accordance with written programmes, as are necessary to achieve the prescribed standard of competence as required by Section A-I/6.1.1 of the STCW Code.**

PHILIPPINE MEASURES

Immediate Measures

1. JCMMC No. 01 series of 2022 ([Attachment 01](#)) provides the revised policies, standards, and guidelines for the Bachelor of Science in Marine Transportation (BSMT) and Bachelor of Science in Marine Engineering (BSMarE) programs. Annexed to this Circular are the standard maritime curricula, developed by CHED and MARINA, for BSMT and BSMarE Programs, which were based on the Curriculum Map ([Attachment 01-A1](#) for BSMT and [Attachment 01-A2](#) for BSMarE) and STCW Competences Map ([Attachment 01-B1](#) for BSMT and [Attachment 01-B2](#) for BSMarE), and specifically address the STCW Regulations II/1 and III/1. In addition, the Programs of Study for BSMT and BSMarE both for 3-1 and 2-1-1 schemes were developed ([Attachment 01-C1](#) for BSMT and [Attachment 01-C2](#) for BSMarE). The standardized course packages for 1st year level have already been approved by CHED (Commission En Banc) through Resolution No. 542-2021 dated 07 September 2021 and issued as an annex to the JCMMC No. 01 series of 2022. The pilot testing of the course packages will be completed in June 2022 and shall be evaluated immediately after. The full implementation of the program of study will start this AY 2022-2023.
2. MARINA and the CHED standardized the course packages which contain Part A - Course Specifications, Part B - Course Outline and Timetable, Part C - Course Syllabus ([Attachment 01-D](#) for BSMT and [Attachment 01-E](#) for BSMarE), the template for Part D - Detailed Teaching Syllabus ([Attachment 01-F](#)) and Part E - Course Outcome Assessment and Assessment Tools ([Attachment 01-G](#)) as endorsed by the TPME through Resolution No. 17-2021 ([Attachment 15](#)) and approved by the CHED Commission en banc through CEB Resolution No. 542-2021.

Subsequently, MARINA and CHED conducted a series of zonal (regional) orientations for all MHEIs on 27 September to 08 October 2021 relative to the implementation of Parts A, B, and C ([Attachment 16](#)).

Relative to Parts D and E, MARINA and CHED conducted another round of zonal orientations and workshops for all recognized MHEIs on November 8, 10, 12 and 22-26, 2021 to ensure that its contents are aligned to the approved Parts A, B and C of the standardized course packages ([Attachment 17](#)).

PHILIPPINE MEASURES

Immediate Measures

3. As a result of the orientations and workshops, some MHEIs were tasked to develop a model sample of Part D (Detailed Teaching Syllabus) and Part E (Course Outcome Assessment and Assessment Tools) of courses aligned with the standard Parts A, B, and C using the prescribed templates issued by CHED and MARINA.
4. The 2nd year level and 3rd year level standardized course packages will be completed in June and August 2022 respectively, and will be implemented by all MHEIs starting AY 2023 to 2024 and 2024 to 2025 respectively. Thereafter, its implementation shall be subject to regular joint monitoring activities and continuous improvement by MARINA and CHED. ([Attachment 19](#))

This model will be cascaded to all MHEIs after CHED and MARINA's approval within April 2022. Thereafter, the other MHEIs will develop their Parts D and E based on their own resources and capabilities, using the model as a guide. Parts D and E include methods and media of delivery, procedures, and course material as necessary to fully achieve the prescribed standards of competence, as required by the STCW Convention and Code. ([Attachment 18](#))

5. The JCMCMC No. 01, series of 2022 ([Attachment 01](#)) shall be implemented beginning AY 2022-2023 and applicable to First Year Level BSMT and BSMarE. Meanwhile, existing Second year, Third year and Fourth year students shall continue to be covered by CMO 67, s. 2017 and CMO 14, s. 2018.

PHILIPPINE MEASURES

Immediate Measures

6. The Joint TWG created by CHED and MARINA have comprehensively reviewed and revised Annex C - Course Specifications for BSMT and BSMarE of CMO No. 14, series of 2018 entitled “Addendum to CMO 67 series of 2017 entitled revised Policies, Standards and Guidelines for the BSMT and BSMarE programs” to address the missing KUPs noted in the ECAR and to ensure that all the KUPs under the STCW Code are sufficiently covered.

Based on the revised course specifications, the MHEIs were directed through Joint CHED-MARINA Advisory No. 02, series of 2022 to review and revise their detailed teaching syllabi in conformity with the revised course specifications to be submitted no later than 15 May 2022. The revised detailed syllabi submitted by MHEIs shall be evaluated and approved for implementation for Academic Year 2022-2023.

For the courses Seam 2 and Seam 6, MHEIs were also directed to acquire the stress calculating equipment/computer and appropriate software to calculate vessel stability and trim (applications) to address the Course Outcomes, and other required equipment for courses identified, cognizant of the policies and standards on carrying capacity. ([Attachment 20](#), [Attachment 20-A](#), [Attachment 20-B](#), [Attachment 20-C](#), [Attachment 21](#))

7. As part of the efforts to ensure that the BSMT and BSMarE programs are structured in accordance with the STCW Convention standard of competence, a number of CHED and MARINA personnel, together with representatives from MHEIs, underwent a training on the principles of curriculum development from December 2021 to January 2022. This is part of the IMO’s training grant to the Philippines under its International Technical Cooperation Program (ITCP). ([Attachment 14](#))

PHILIPPINE MEASURES

Way Forward

8. CHED-MARINA shall undertake regular monitoring activities ([Attachment 22](#)) to verify the compliance of the MHEIs with the new PSG starting AY 2022-2023 for First Year Level BSMT and BSMarE. Those that are found to be non-compliant and have failed to address the monitoring findings within the prescribed period shall be sanctioned pursuant to JCMMC No. 03, series of 2022 ([Attachment 03](#)) in relation to JCMMC No. 01, series of 2022.

Analysis of monitoring results will be used as a basis in coming up with recommendations to solve any identified weakness in the system based on the identified gaps.

PHILIPPINE MEASURES

Factual Evidence

Attachment 01	JCMMC No. 01, series of 2022
Attachment 01-A1	Annex A1 - Curriculum Map for BSMT program
Attachment 01-A2	Annex A2 - Curriculum Map for BSMarE program
Attachment 01-B1	Annex B1 - STCW Competences Map for BSMT program
Attachment 01-B2	Annex B2 - STCW Competences Map for BSMarE program
Attachment 01-C1	Annex C1 - Programs of Study for BSMT (3-1 and 2-1-1 schemes)
Attachment 01-C2	Annex C2 - Programs of Study for BSMarE (3-1 and 2-1-1 schemes)
Attachment 01-D	Annex D - BSMT Course Package – Parts A to C - Course Specifications, Course Outline and Timetable, and Course Syllabus
Attachment 01-E	Annex E - BSMarE Course Package – Parts A to C - Course Specifications, Course Outline and Timetable, and Course Syllabus
Attachment 01-F	Annex F - Detailed Teaching Syllabus Template (Part D)
Attachment 01-G	Annex G - Course Outcomes assessment and Assessment Tools (Part E)
Attachment 15	TPME Resolution No. 17 s. 2021
Attachment 16	Post Activity Report of Zonal Orientation from 27 September to 08 October 2021
Attachment 17	Post Activity Report of the conducted Zonal Orientation on November 8, 10, 12 and 22-26, 2021
Attachment 18	Timeline of Activities on the Development, Approval, and Implementation of Parts D (Detailed Teaching Syllabus) and E (Course Outcomes Assessment)
Attachment 19	Timeline of Activities for the Standardization of 2nd year and 3rd year level BSMT and BSMarE Programs
Attachment 20	Joint CHED-MARINA Advisory No. 02 series of 2022
Attachment 20- A	Revised Course Syllabus for Celestial Navigation (NAV 4) under JCMA No. 02, s. 2022
Attachment 20-B	Revised Course Syllabus for Voyage Planning (NAV 7) under JCMA No. 02, s. 2022
Attachment 20-C	Revised Course Syllabus for Leadership and Teamwork (Mngt 1) under JCMA No. 02, s. 2022
Attachment 21	Timeline of Activities for the Revision of Detailed Teaching Syllabus pursuant to under JCMA No. 02, s. 2022 No. 02, s. 2022
Attachment 14	IMO Consultants' Report on National Workshop on the Principles for the Design and Development of Curriculum for the Implementation of the STCW Convention, 1978, as amended (Phase 3)
Attachment 22	Annual Monitoring Program for CY 2022



Maritime Administration

Programme and course design, review and approval

SHORTCOMING 1

*The Philippines' authorities do not ensure that the **education and training is structured in accordance with written programmes, and included the methods and media of delivery, procedures, and course material as necessary to fully achieve the prescribed standards of competence, as required by the STCW Convention and Code.***

The review/evaluation of the program and course design, review and approval identified several grievances. In particular:

Grievance 2

Inconsistent provisions on the competences that the BSMT and BSMarE programmes should cover

Specific Finding 1

Missing KUPs in the programmes for chief engineer officers and second engineer officers on ships powered by main propulsion machinery of 3,000 kW propulsion power or more

Table A-III/2 of Section A-III/2 of the STCW Code includes the specification of minimum standard of competence for chief engineer officers and second engineer officers on ships powered by main propulsion machinery of 3,000 kW propulsion power or more.

As mentioned in the previous section in relation to the curriculum mapping, JCMMC No. 1 of 2019 includes as an annex a “curriculum mapping” outlining the curriculum for the BSMarE and BSMT programmes. The provisions of sections 4 and 6 of JCMMO No. 1 of 2019 include **some training courses** aiming at the management level competences required by Section A- III/2 of the STCW Code for second engineer officers and chief engineer officers. The curriculum mapping for the BSMarE programme specified in annex A to JCMMC No. 1 of 2019 includes reference to **all the fourteen competences** specified in Table A-III/2 of Section A-III/2 of the STCW Code.

1. ***However, the curriculum mapping does not address four of the knowledge, understanding and proficiency items (hereafter – KUPs) of column 2 of Table A-III/2 related to two of the competences, namely: “organisation of fire and abandon ship drills”, “maintenance of operational condition of life-saving, fire-fighting and other safety systems”, “methods and aids for fire prevention, detection and extinction”, “functions and use of life saving appliances”. As the curriculum mapping does not address all the KUPs required under Table A-III/2 of the STCW Code, the maritime administration does not ensure that the level of knowledge, understanding and proficiency is achieved.***

Specific Finding 2

Missing competences in the programmes for master or chief mate of ships of 500 gross tonnage or more

2. *The provisions of sections 4 and 6 of JCMMO No. 1 of 2019 include some training courses addressing the management level competences required by Section A-II/2 of the STCW Code for chief mates and masters.*

The curriculum mapping for the BSMT programme specified in annex A to JCMMO No. 1 of 2019 does not address 13 out of the 21 competences specified in Table A-II/2 of Section A-II/2 of the STCW Code. As the curriculum mapping does not address all the competences required under Table A-II/2 of the STCW Code, the maritime administration does not ensure that the level of knowledge, understanding and proficiency is achieved.

PHILIPPINE MEASURES

Immediate Measures

At the time of the EMSA Inspection, the prevailing curriculum that is being used by the MHEIs is the one contained in CMO 67, S-2017. Under this, some competences under Table A-II/2 and A-III/2 are included.

To fully address these grievances, the MARINA and CHED have issued the JCMMC 01 series of 2022 specifying the Program Descriptions and Nature of Field of Study covered by the BSMT and BSMarE Programs which will enter into force in AY 2022-2023.

The BSMT and BSMarE programs under JCMMC No. 01 series of 2022 cover all KUPs under Table A-II/1 and Table A-III/1 and some knowledge and understanding under Table A-II/2 (i.e. 1) *operating principles of marine power plants*, 2) *ships' auxiliary machinery*, and 3) *general knowledge of marine engineering terms*) and A-III/2 (i.e. 1) *thermodynamics*, 2) *mechanics and hydromechanics*, 3) *physical and chemical properties of fuel and lubricants*, 4) *technology of materials*, 5) *heat cycle, thermal efficiency and heat balance*, 6) *non-destructive examination*, and 7) *refrigerators and refrigeration cycles*) of the STCW Code are incorporated in the Standardized Course Packages.

The STCW Competences Map of the BSMarE Program ([Attachment 01-B2](#)) does not include the four KUPs of Table A-III/2 since their corresponding four courses are undertaken by the BSMarE graduates as required training prior to Certification by MARINA under Regulation III/2 of the STCW Convention, 1978, as amended. The required training prior to certification is handled by Maritime Training Institutions and are therefore covered by the mandatory training standards applicable to them.

On the other hand, the STCW Competences Map of the BSMT Program ([Attachment 01-B1](#)) covers the required competences under Table II/1 and some selected knowledge and understanding from Table A-II/2, as those are related to performance of duties by OIC-NW onboard. Not all competences of Table A-II/2 are being covered since those are for management level officers.

PHILIPPINE MEASURES

Factual Evidence

Attachment 01-B1	Annex B1 - STCW Competences Map for BSMT program
Attachment 01-B2	Annex B2 - STCW Competences Map for BSMarE program

Specific Finding 3

Missing education and training requirements for radio operators

Table A-IV/2 of Section A-IV/2 of the STCW Code includes the specification of minimum standard of competence for GMDSS radio operators.

The provisions of sections 4, 6 and 10 of JCMMO No. 1 of 2019 do not establish that the BSMT programme shall cover the education and training requirements of Regulation IV/2 of the STCW Convention for GMDSS radio operators or the competences specified in Table A- IV/2 of Section A-IV/2 of the STCW Code. However, section 12 and the “curriculum mapping” for the BSMT programme requires that candidates shall achieve the knowledge, understanding and skills needed to meet the standards of competence specified in Section A- IV/2 of the STCW Code for the GMDSS general operator’s certificate.

3. *Hence, the BSMT programme covers Section A-IV/2 of the STCW Code only within the context of requiring candidates to demonstrate the competences for certification as radio operator whereas it does not require them to complete education and training for radio operators subject to this Section, as required by Regulation IV/2 of the STCW Convention. Therefore, the BSMT programme does not ensure that candidates meet the minimum standard of competence prescribed by Section A-IV/2 of the STCW Code.*

4. *Therefore, due to the fact that Sections A-II/2, A-III/3, and A-IV/2 are not covered properly in the BSMT and BSMarE programmes, the competences and the level of knowledge, understanding and proficiency cannot be achieved as required by Sections A-II/2, A-III/3 and A-IV/2 of the STCW Code.*

PHILIPPINE MEASURES

Immediate Measures

The MARINA and CHED have issued JCMMC No. 01 series of 2022 specifying the Program Description, Nature of Field of Study, Program Outcomes and Standard of Competence covered by the BSMT Program. The competences, under Table A-IV/2 of the STCW Code, are not included in the BSMT program since a training on GMDSS Radio Operators shall be required prior to Certification for OIC-NW by MARINA.

The education and training requirements for GMDSS Radio Operators under Table A-IV/2 of the STCW Convention, 1978, as amended, are currently being addressed by the Training Standard ([Attachment 23](#) and [Attachment 24](#)) implemented by the MARINA accredited Maritime Training Institutions (MTIs) by virtue of STCW Circular No. 2018-02 ([Attachment 25](#)).

The STCW Competences Map for BSMT program (Attachment 01-B1) includes the course on Maritime Communication (MARCOM) that covers the fundamentals of radiocommunications where the introduction to GMDSS is taken up. The Course Specifications of this course is part of the 2nd Year Standard Course Package which is expected to be finished by June 2022. ([Attachment 19](#))

PHILIPPINE MEASURES

Factual Evidence

Attachment 23	Course Approval of GMDSS Radio Operators Training Standards
Attachment 24	Training standard for GMDSS Radio Operators
Attachment 25	MARINA STCW Circular No. 2018-02 - Standards for Mandatory Training Courses under the STCW Convention, 1978, as Amended
Attachment 01-B1	Annex B1 - STCW Competences Map for BSMT program
Attachment 19	Timeline of Activities for the Standardization of 2nd year and 3rd year level BSMT and BSMarE Programs

Maritime Administration

Structure of ancillary courses

SHORTCOMING 2

The Philippines' authorities do not ensure that all ancillary training courses are structured in accordance with written programmes, and included the methods and media of delivery, procedures, and course material as necessary to fully achieve the prescribed standards of competence, as required by the STCW Code.

The review/evaluation of the program and course design, review and approval identified several grievances. In particular:

Grievance 3

Insufficient structure of design and approval of mandatory STCW training courses and refresher courses

MARINA, as required by EO No. 63, needs to conduct several activities for approving training required by Chapter VI of the STCW Convention in accordance with the national regulations, namely MARINA STCW Circular No. 2018-2 and STCW Advisory No. 2019-5. Those activities included verification that the training and refresher courses submitted by the Maritime Training Institutions (MTIs) for approval complied with the national standards for each course established and specified by MARINA.

Sections A-VI/1, A-VI/2 and A-VI/3 of the STCW Code require seafarers to provide evidence, every five years, that they have the required standard of competence. In this respect refresher courses subject to approval by MARINA are organised. They focus on some of the competences specified in Sections A-VI/1, A-VI/2 and A-VI/3 of the STCW Code and aimed to ensure compliance with the provisions of the Code that require seafarers to provide evidence, every five years, that they have maintained the required standard of competence in the areas for which on-board training and experience cannot be accepted as such evidence, as established in those sections.

However, the standards developed by MARINA for two refresher courses and one regular course did not address some competence areas that those courses should have covered:

- *Table A-VI/2-2 includes the specification of the minimum standards of competence in fast rescue boats.*

However, the refresher course on “personal survival techniques” developed by MARINA did not include training in “board a survival craft from the water while wearing a lifejacket” (Column 3), which is one of the methods for demonstrating the competence ‘survive at sea in the event of ship abandonment’ (Column 1) required in Table A-VI/1-1.

Therefore, MARINA does not ensure that the programmes allow seafarers to provide the evidence of having maintained the standard of competence required therein;

- *Table A-VI/2-2 includes the specification of the minimum standards of competence in fast rescue boats.*

However, the refresher course on “fast rescue boats” developed by MARINA did not include training in “3. swim in special equipment”, as a method required by column 3 of Table A-VI/2-2 in order to demonstrate the competence “Take charge of a fast rescue boat after launching” of column 1 of Table A-VI/2-2 and “assessment of evidence obtained from practical demonstration of ability to start and operate a fast rescue boat engine”, as a method required by column 3 of Table A-VI/2-2 in order to demonstrate the competence “Operate a fast rescue boat engine” of column 1 of Table A-VI/2-2. Therefore, MARINA does not ensure that the programmes allow seafarers to provide the evidence of having maintained the standard of competence required therein;

- *Table A-VI/1-1 of the STCW Code includes specification of the minimum standards of competence in personal survival techniques.*

However, the regular course on “personal survival techniques”, developed by MARINA does not include training in boarding a davit-launched liferaft from the ship, which is an element of point 7. board a survival craft from the ship and water while wearing a lifejacket, one of the methods for demonstrating the competence ‘Survive at sea in the event of ship abandonment’, as required in Table A-VI/1-1 (Column 3). This is supported by the fact that the standard developed by MARINA did not require the training centre to have a davit-launched liferaft with launching davit to be available as part of the course equipment. Therefore, the seafarers are not fully trained as required therein.

PHILIPPINE MEASURES

Immediate Measures

1. MARINA reviewed and revised the training standards for the following training courses which were approved on 26 February 2021 and published at MARINA STCW Office website as Annexes to STCW Advisory No. 2019-05. Its implementation has been reinforced pursuant to the MARINA Advisory No. 2021-21 ([Attachment 07](#)) issued on 08 April 2021:
 - The refresher course on Personal Survival Techniques ([Attachment 26](#)) includes the training on “boarding a survival craft from the water while wearing a lifejacket” with corresponding practical exercise plan and practical assessment scenario.
 - The refresher course on Fast Rescue Boat ([Attachment 27](#)) includes the training on how to “swim with special equipment” and “operate the fast rescue boat engine” using their respective practical exercise plans and practical assessment scenarios.
 - The regular course on Personal Survival Techniques ([Attachment 28](#)) includes the training on “boarding a davit-launched life raft from the ship” with corresponding practical exercise plan and assessment scenario. Likewise, MARINA required accredited MTIs the training equipment “davit-launched life raft with launching davit”.
2. The MARINA conducted virtual orientation ([Attachment 29](#)) on 24 March 2021 to disseminate information to stakeholders on the revised training standards with the end in view of enhancing the level of compliance of MTIs.
3. MARINA conducted inspection of MTIs to verify the compliance to the MARINA Advisory No. 2021-21. ([Attachment 30](#), [Attachment 31](#))
4. To ensure continued compliance of the MTIs with the revised training standards, MARINA shall undertake regular monitoring activities pursuant to the MARINA issued Memorandum Circular No. SC-2021-02. ([Attachment 32](#) and [Attachment 33](#))

PHILIPPINE MEASURES

Factual Evidence

Attachment 07	MARINA Advisory 2021-21
Attachment 26	Revised Training Standard for Refresher Course on Basic Training (Personal Survival Techniques)
Attachment 27	Revised Training Standard for Refresher Course on Fast Rescue Boat
Attachment 28	Revised Training Standard for Regular Course on Personal Survival Techniques (Under Basic Training Full Course
Attachment 29	Post Activity Report on the conducted Orientation to Stakeholders dated 24 March 2021
Attachment 30	Inspection Reports under MARINA Advisory No. 2021-21 (COMPASS-MANILA-RBT, COMPASS Silang BT and RBT)
Attachment 31	Issued Notice of Deficiency (NOD), and Cease and Desists Order to MTIs pursuant to MARINA Advisory No. 2021-21
Attachment 32	MARINA Memorandum Circular No. SC-2021-02
Attachment 33	Form MD-02 Rev 02: Monitoring Instrument for Approved Training Courses (ATCs)



Maritime Higher Education Institutions

SHORTCOMING 3

Therefore, the Philippines' authorities do not ensure that the programmes delivered by the MHEIs are fully structured and include the methods and media of delivery, procedures, and course material as necessary to achieve the prescribed standards of competence, as required by the STCW Convention and Code.

The following deficiencies were found in the course syllabi developed by the visited MHEIs and approved by CHED and MARINA:

Grievance 4

Inconsistent teaching and examination methods, facilities and equipment

Table A-II/2 of Section A-II/2 of the STCW Code requires the use of stress-calculating equipment in its column 3 as one of the methods for demonstrating the competence "Plan and ensure safe loading, stowage, securing, care during the voyage and unloading of cargoes". **However, the syllabus of the course 'SEAM 122 delivered by one of the visited MHEI does not include the use of stress-calculating equipment when it addresses the KUP on 'trim, stability and stress' specified in the Table A-II/2 of the STCW Code. As the course syllabus does not include the use of stress-calculating equipment, the competence "Plan and ensure safe loading, stowage, securing, care during the voyage and unloading of cargoes" is not achieved.**

Hence, the level of competence required by the Sections A-II/1 and A-II/2 of the STCW Code is not achieved.

PHILIPPINE MEASURES

Immediate Measures

1. MARINA-CHED notified the 11 MHEIs of the specific findings in the ECAR. They were required to explain and give comments on the findings and to submit a corrective action plan to address the findings and prevent their recurrence. Based on the submitted corrective action plan and the results of the evaluation, the 11 MHEIs will be subjected to monitoring from February to March 2022 using the enhanced OBMI under CMO 67, series of 2017. Those found non-compliant and failed to address the shortcomings noted within the prescribed period will be issued Show Cause Order in accordance with existing policies, rules, and regulations. ([Attachment 34](#), [Attachment 34-A](#), [Attachment 34-B](#), [Attachment 34-C](#), [Attachment 34-D](#), [Attachment 34-E](#), [Attachment 34-F](#), [Attachment 34-G](#), [Attachment 34-H](#), [Attachment 34-I](#), [Attachment J](#), [Attachment 34-K](#), [Attachment 22](#), [Attachment 35](#), [Attachment 37](#))
2. CHED-MARINA has issued the Standardized Course Package for the First Year Level which includes Part C - Course Syllabus ([Attachment 01-D](#)). This will ensure that the BSMT and BSMarE courses contain all the KUPs for the competences required under the Table A-II/1 and A-III/1 of the STCW Code.
3. In order to ensure that teaching and examination methods, as well as facilities and equipment, achieve course learning outcomes, a template of detailed teaching syllabus and course outcomes assessment are provided by the CHED-MARINA to the MHEIs. These will serve as a guide for instructors in the delivery of courses and conduct of assessment. Over and above this, the model detailed syllabus will be provided to MHEIs as a reference and guide. ([Attachment 01-F](#), [Attachment 01-C](#))

As of February 2022, CHED and MARINA have completed the monitoring of the University of Cebu. The shortcomings raised in this joint monitoring activity will be processed in accordance with the existing rules and regulations ([Attachment 36](#)). The 10 remaining MHEIs mentioned in the ECAR shall be monitored within March 2022. ([Attachment 22](#)).

PHILIPPINE MEASURES

Immediate Measures

4. The Joint TWG created by CHED and MARINA has comprehensively reviewed and revised Annex C - Course Specifications for BSMT and BSMarE of CMO No. 14, series of 2018 entitled "Addendum to CMO 67 series of 2017 entitled revised Policies, Standards and Guidelines for the BSMT and BSMarE programs" to address the missing KUPs noted in the ECAR and to ensure that all the KUPs under the relevant table of the STCW Code are sufficiently covered.

Based on the revised course specifications, the MHEIs were directed through Joint CHED-MARINA Advisory No. 02, series of 2022 to review and revise their detailed teaching syllabi in conformity with the revised course specifications to be submitted no later than 15 May 2022. The revised detailed syllabi submitted by MHEIs shall be evaluated and approved for implementation for Academic Year 2022-2023.

For the courses Seam 2 and Seam 6, MHEIs were also directed to acquire the stress calculating equipment/computer and appropriate software to calculate vessel stability and trim (applications) to address the Course Outcomes, and other required equipment for courses identified, cognizant of the policies and standards on carrying capacity. ([Attachment 20](#), [Attachment 20-A](#), [Attachment 20-B](#), [Attachment 20-C](#), [Attachment 21](#))

PHILIPPINE MEASURES

Way Forward

5. Other MHEIs will likewise be subjected to regular monitoring based on the approved Annual Monitoring Program ([Attachment 22](#)) for CY 2022 using the prescribed OBMI that was enhanced to include specific objective evidence to guide the evaluator in the conduct of monitoring. The shortcomings that will be raised in the joint monitoring activities will be processed in accordance with the existing rules and regulations. If found non-compliant and failed to address the shortcomings noted within the prescribed period, a Show Cause Order will be issued in accordance with existing policies, rules, and regulations.
6. CHED and MARINA will continue to conduct Capacity Building of its personnel on the conduct of evaluation and inspection, and monitoring, at least twice a year and as may be deemed necessary, to ensure shared understanding of the requirements and manner of implementation of policies and standards, as well as rules and regulations. ([Attachment 38](#), [Attachment 39](#), and [Attachment 40](#))

In addition, the MARINA is currently coordinating with the IMO ([Attachment 41](#) and [Attachment 42](#)) for another round of training under the ITCP regarding the evaluation, inspection and monitoring of maritime education programs.

PHILIPPINE MEASURES

Factual Evidence

Attachment 34	CHED Memorandum from the Office of the Executive Director No. 78-2022
Attachment 34- A	PMI Colleges Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34- B	University of Cebu - METC Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34- C	Our Lady of Fatima University (OLFU) Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-D	John B. Lacson Foundation Maritime University (JBLFMU) Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-E	PMMA Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-F	BIT International College's Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-G	Cristal E-College Compliance Detailed Evaluation with MARINA and CHED Communication Letters
Attachment 34-H	PNTC Colleges Compliance Detailed Evaluation with MARINA and CHED Communication Letters
Attachment 34-I	Baliwag Maritime Academy Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-J	PMMS Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34- K	Asian Institute of Maritime Studies Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 22	Annual Monitoring Program for CY 2022
Attachment 35	Special Order No. 101-22
Attachment 36	Monitoring Report for MEP (UC-METC) including attachments 22-25 Feb2022

PHILIPPINE MEASURES

Factual Evidence

Attachment 37	Enhanced OBMI for MEPs under CMO No. 67, series of 2017
Attachment 01-D	Annex D - BSMT Course Package – Parts A to C - Course Specifications, Course Outline and Timetable, and Course Syllabus
Attachment 01-F	Annex F - Detailed Teaching Syllabus Template (Part D)
Attachment 01-G	Annex G - Course Outcomes assessment and Assessment Tools (Part E)
Attachment 20	Joint CHED-MARINA Advisory No. 02 series of 2022
Attachment 20-A	Revised Course Syllabus for Celestial Navigation (NAV 4) under JCMA No. 02, s. 2022
Attachment 20-B	Revised Course Syllabus for Voyage Planning (NAV 7) under JCMA No. 02, s. 2022
Attachment 20-C	Revised Course Syllabus for Leadership and Teamwork (Mngt 1) under JCMA No. 02, s. 2022
Attachment 21	Timeline of Activities for the Revision of Detailed Teaching Syllabus pursuant to under JCMA No. 02, s. 2022 No. 02, s. 2022
Attachment 38	Calibration Workshop on Conducting Audits and Report Writing dated 28 August 2021
Attachment 39	Post Activity Report of the Calibration Workshop dated 09 February 2022
Attachment 40	Timeline of Activities for the Capacity Building
Attachment 41	MARINA Letter to IMO regarding Request Further Assistance to the Philippines dated 02 February 2022
Attachment 42	IMO TCD Letter to MARINA dated 04 February 2022

SHORTCOMING 3

Therefore, the Philippines' authorities do not ensure that the programmes delivered by the MHEIs are fully structured and include the methods and media of delivery, procedures, and course material as necessary to achieve the prescribed standards of competence, as required by the STCW Convention and Code.

The following deficiencies were found in the course syllabi developed by the visited MHEIs and approved by CHED and MARINA:

Grievance 5

Courses do not cover all KUPs specified by the STCW Code for the competences addressed

- Table A-IV/2 of Section A-IV/2 of the STCW Code for the competence “Transmit and receive information using GMDSS subsystems and equipment and fulfilling the functional requirements of GMDSS” requires, among others, under its column 2 on the KUPs, the knowledge on the requirements of the Radio Regulations and ‘the means to prevent false distress alerts and procedures to mitigate the effects of such alerts’.
- Table A-IV/2 of Section A-IV/2 of the STCW Code requires minimum standards for the competence “Transmit and receive information using GMDSS subsystems and equipment and fulfilling the functional requirements of GMDSS” and includes, among others, under its column 2 on the KUPs, knowledge of the requirements of the Radio Regulations. **However, the syllabi of the ‘MARCOM’ courses on GMDSS general operators delivered by the PMI Colleges and the University of Cebu refers to phased-out communication systems, which are not anymore required as subsystems and equipment of the GMDSS, such as Inmarsat A and B, while they do not refer to other equipment, such as the satellite communication system ‘Fleet 77’ (‘Fleet Broadband’ and ‘Fleet One’), and the AIS-SART, which has been required by Chapter IV of SOLAS Convention for more than ten years³. In addition, those syllabi of the ‘MARCOM’ courses do not include content on operational communication procedures in accordance with the provisions prescribed in Chapters VII and IX of the Radio Regulations,** in line with the KUPs required under Table A-IV/2 of the STCW Code.

However, the syllabus of the course on ‘maritime communications for the GMDSS for general operator’s certificate’ delivered by the PNTC Colleges does not cover the knowledge on ‘2. the means to prevent false distress alerts and procedures to mitigate the effects of such alerts’ and does not fully address the operational procedures in accordance with the provisions prescribed in Chapters VII and IX of the Radio Regulations. Hence, the lack of the knowledge required under Table A- IV/2 of Section A-IV/2 of the STCW Code does not ensure that the prescribed standard of competence is achieved.

Hence, the lack of the knowledge required under Table A-IV/2 of Section A-IV/2 of the STCW Code does not ensure that the prescribed standard of competence is achieved.

- Table A-II/2 of Section A-II/2 of the STCW Code under the competence “Plan a voyage and conduct navigation” requires under its column 2, KUP, among others, on ‘vessel traffic services (VTS)’ and ‘routeing in accordance with General Provisions of Ship Routeing’.
- Table A-II/1 of Section A-II/1 of the STCW Code under the competence “Maintain seaworthiness of the ship” requires, in its column 2, KUP on ship stability ‘working knowledge and application of stability, trim and stress tables, diagrams and stress- calculating equipment’.

However, the syllabus of the course on ‘voyage planning’ delivered by PMI Colleges does not address the topics ‘general provisions on ship’s routing’ and ‘principles of ship reporting and VTS procedures’. Hence, the lack of the knowledge, understanding and proficiency required under Table A-II/2 of Section A-II/2 of the STCW Code does not ensure that the prescribed standard of competence is achieved.

However, the syllabus of the course delivered by the University of Cebu, which is intended to cover the KUP on trim, stability and stress as defined in Table A-II/1 of Section A-II/1 of the STCW Code, addresses the theoretical explanation concerning the ship’s stress parameters, namely the bending moments and shearing forces, but does not address the calculation of those stress parameters, which is fundamental for achieving the required working knowledge. Hence, the lack of the working knowledge required under Table A-II/1 of Section A- II/1 of the STCW Code does not ensure that the prescribed standard of competence is achieved.

- Table A-II/2 of Section A-II/2 of the STCW Code under the competence “Carriage of dangerous goods” requires in its column 2 the KUPs ‘International regulations, standards, codes and recommendations on the carriage of dangerous cargoes, including the International Maritime Dangerous Goods (IMDG) Code and the International Maritime Solid Bulk Cargoes (IMSBC) Code’ and ‘Carriage of dangerous, hazardous and harmful cargoes; precautions during loading and unloading and care during the voyage’.
- Table A-II/1 of Section A-II/1 of the STCW Code includes the competence “Monitor the loading, stowage, securing, care during the voyage and the unloading of cargoes” and the necessary criteria for evaluating this competence. Table A-II/2 of Section A-II/2 of the STCW Code includes the competence “Plan and ensure safe loading, criteria for evaluating this competence. **However, the syllabus for a course delivered by the John B. Lacson Foundation Maritime University dealing with cargo work relevant to all types of cargo, which should have covered the relevant KUPs for both officers and masters under the above-mentioned competences, does not sufficiently address cargo planning and the handling of dangerous, hazardous and harmful cargoes, including the segregation of cargoes, in compliance with international regulations and recognised standards and codes of safe practice,** as required by the criteria for evaluating these competences under the above-mentioned tables.

However, the syllabi of the courses delivered by Our Lady of Fatima University that should address the above-mentioned competence does not cover those KUPs. Hence, the lack of the knowledge, understanding and proficiency required under Table A-II/2 of Section A-II/2 of the STCW Code does not ensure that the prescribed standard of competence is achieved.

Hence, the lack of these criteria required under Table A-II/1 of Section A-II/1 of the STCW Code does not ensure that the prescribed standard of competence is achieved.

- Table A-II/1 of Section A-II/1 of the STCW Code includes the competences “Plan and conduct a passage and determine position” and “Maintain a safe navigational watch” and the necessary KUPs for these competences.

However, the syllabus of the course ‘Nav 7’ delivered by John B. Lacson Foundation Maritime University, designed for covering the KUPs corresponding to the above-mentioned competences, does not address several of those KUPs. In particular, it does not address the KUPs on ‘Ability to operate the equipment and apply the information correctly’, ‘Knowledge of the principles of magnetic and gyro-compasses’, ‘Ability to determine errors of the magnetic and gyro-compasses, using celestial and terrestrial means, and to allow for such errors’,

‘Ability to use and interpret information obtained from shipborne meteorological instruments’, ‘Ability to apply the meteorological information available’, which are required for the competence “Plan and conduct a passage and determine position”, and the KUP on ‘Knowledge of blind pilotage techniques’ required for the competence “Maintain a safe navigational watch”. Hence, the lack of these KUPs under Table A-II/1 of Section A-II/1 of the STCW Code does not ensure that the prescribed standard is achieved.

Hence, the above courses, which do not cover all knowledge, understanding and proficiency, and criteria for evaluating competences, specified by the STCW Code for the competences addressed, are not structured as necessary to ensure that the prescribed standards of competence are achieved, as required by Section A-I/6.1.1 of the STCW Code.

PHILIPPINE MEASURES

Discussions between CHED and MARINA on this specific grievance noted that, with respect to the recommended equipment for MARCOM, the subsystem Fleet 77 is not being used since it is part of the mandatory training for GMDSS Radio Operators ([Attachment 23](#), [Attachment 24](#)) that is conducted by MARINA-accredited MTIs which is taken by the BSMT graduates as a requirement for certification as OIC-NW. Thus, the BSMT program includes only the fundamentals in radiocommunications and does not need the actual installation of subsystem Fleet 77 in the familiarization of the GMDSS equipment.

However, CHED and MARINA recognize that based on the Curriculum Map and the STCW Competences Map, the knowledge required under Table A-IV/2 of Section A-IV/2 of the STCW Code will be expected by the EMSA auditors since it was not specified in the JCMMC No. 01, 2019 that only selected and fundamental knowledge and understanding will be covered by the BSMT curriculum. Thus, in order to address this confusion MARINA and CHED updated the Curriculum Map ([Attachment 01-A1](#)) and STCW Competences Map ([Attachment 01-B1](#)) to specify the fundamental knowledge and understanding under Table A-IV/2 of Section A-IV/2 of the STCW Code that will only be covered by the BSMT program.

The Administration took further actions as follows:

PHILIPPINE MEASURES

Immediate Measures

1. CHED and MARINA notified PMI Colleges, University of Cebu, Our Lady of Fatima University and John B. Lacson Foundation Maritime University ([Attachment 34](#)) of the specific findings noted in the ECAR. They were required to explain and give comments and to submit a corrective action plan to address the findings and prevent their recurrence. The Administration evaluated the documents submitted by the MHEIs.
 - PMI Colleges (Attachment 34-A) submitted their compliance documents on 28 January 2022, which were subsequently reviewed and evaluated. It was noted in the review that the PMI submitted a revised course syllabus which no longer refers to Inmarsat A and B. However, the submitted “GMDSS-Laboratory Assessment” still refers to Inmarsat B. While the use of Inmarsat fleet 77 has been included in the exercise, there is no specific activity where this will be utilized. There are also no Student Learning Activities for demonstration of the use of GMDSS equipment. Therefore, based on the factual evidence submitted, the evaluation team concludes that the specific finding has not been sufficiently addressed.
 - For UC, their compliance documents were submitted on 28 January 2022. Based on the evaluation, it was found out that in their MARCOM 311 Syllabus, no laboratory facilities and equipment required for the delivery of the practical component of the course were indicated and the topics do not include AIS-SART and Operational Communication Procedures (based on Chapters VII and IX, Radio Regulations). Further, no evidence was provided for the Practical Exercise and Assessment on the use of Fleet 77 and AIS-SART and for the capability of the GMDSS simulator for the function/operation of Fleet 77 and AIS-SART. ([Attachment 34-B](#)). Therefore, based on the factual evidence submitted, the evaluation team concludes that the specific finding has not been sufficiently addressed.
 - Based on the documents submitted by OLFU on 27 January 2022, it was found out that the course outcome in SEAM 4 does not sufficiently cover the KUPs which are supposed to be developed as stated in the course specifications. ([Attachment 34-C](#)). Therefore, based on the factual evidence submitted, the evaluation team concludes that the specific finding has not been sufficiently addressed.

PHILIPPINE MEASURES

Immediate Measures

- Lastly, JBLFMU submitted their documents on 27 January 2022 and the institution committed to complete the revision of their detailed teaching syllabus in May 2022. The revision shall include cargo planning and the handling of dangerous, hazardous and harmful cargoes, including the segregation of cargoes, in compliance with international regulations and recognized standards and codes of safe practice. ([Attachment 34-D](#)). Therefore, based on the factual evidence submitted, the evaluation team concludes that the specific finding has not been sufficiently addressed.

The Administration through CHED informed the PMI Colleges, University of Cebu, Our Lady of Fatima University and John B. Lacson Foundation Maritime University of the results of the evaluation and that the compliance of the MHEIs will be verified in the regular monitoring which will be conducted from February to March 2022. The shortcomings that will be raised in the joint monitoring activities will be processed in accordance with the existing rules and regulations. If found non-compliant and failed to address the shortcomings noted within the prescribed period, a Show Cause Order will be issued in accordance with existing policies, rules, and regulations.
- 2. Based on the submitted corrective action plan and the results of the evaluation, the 11 MHEIs are currently being subjected to regular monitoring ([Attachment 22](#), [Attachment 35](#), and [Attachment 43](#)). Other MHEIs will likewise be subjected to regular monitoring from April to December 2022. The shortcomings that will be raised in the joint monitoring activities will be processed in accordance with the existing rules and regulations. If found non-compliant and failed to address the shortcomings noted within the prescribed period, a Show Cause Order will be issued in accordance with existing policies, rules, and regulations.

PHILIPPINE MEASURES

Immediate Measures

3. The Joint TWG created by CHED and MARINA has comprehensively reviewed and revised Annex C - Course Specifications for BSMT and BSMarE of CMO No. 14, series of 2018 entitled “*Addendum to CMO 67 series of 2017 entitled revised Policies, Standards and Guidelines for the BSMT and BSMarE programs*” to address the missing KUPs noted in the ECAR and to ensure that all the KUPs under the relevant table of the STCW Code are sufficiently covered.

Based on the revised course specifications, the MHEIs were directed through Joint CHED-MARINA Advisory No. 02, series of 2022 to review and revise their detailed teaching syllabi in conformity with the revised course specifications to be submitted no later than 15 May 2022. The revised detailed syllabi submitted by MHEIs shall be evaluated and approved for implementation for Academic Year 2022-2023.

For the courses Seam 2 and Seam 6, MHEIs were also directed to acquire the stress calculating equipment/computer and appropriate software to calculate vessel stability and trim (applications) to address the Course Outcomes, and other required equipment for courses identified, cognizant of the policies and standards on carrying capacity. ([Attachment 20](#), [Attachment 20-A](#), [Attachment 20-B](#), [Attachment 20-C](#), [Attachment 21](#))

PHILIPPINE MEASURES

Way Forward

4. CHED and MARINA will continue to conduct Capacity Building of their personnel on the conduct of evaluation and inspection, and monitoring, at least twice a year and as may be deemed necessary, to ensure shared understanding of the requirements and manner of implementation of policies and standards, as well as rules and regulations. ([Attachment 38](#), [Attachment 39](#), and [Attachment 40](#))
5. The CHED and MARINA will continue implementing the Project ACE (Advancing Competencies for Excellence) as part of the regular capacity building / professional development program for instructors, assessors and OBT supervisors of MHEIs. ([Attachment 44](#))

In addition, the MARINA is currently coordinating with the IMO ([Attachment 41](#) and [Attachment 42](#)) for another round of training under the ITCP regarding the evaluation, inspection and monitoring of maritime education programs.

Project ACE includes the conduct of regular capacity building for the development of course packages Part D (Detailed Teaching Syllabus) and Part E (Course Outcomes Assessment and Assessment Tools) for all courses from 1st year to 3rd year levels of the BSMT and the BSMarE programs.

PHILIPPINE MEASURES

Factual Evidence

Attachment 23	Course Approval of GMDSS Radio Operators Training Standards
Attachment 24	Training standard for GMDSS Radio Operators
Attachment 01-A1	Annex A1 - Curriculum Map for BSMT program
Attachment 01-B1	Annex B1 - STCW Competences Map for BSMT program
Attachment 34	CHED Memorandum from the Office of the Executive Director No. 78-2022
Attachment 34-A	PMI Colleges Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-B	UC-METC Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-C	OLFU Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-D	JBLFMU Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 22	Annual Monitoring Program for CY 2022
Attachment 35	Special Order No. 101-22 - Monitoring of Maritime Education Programs Offered by Recognized MHEIs
Attachment 43	Memorandum of CHED to CHEDRO Informing Joint CHED-MARINA Monitoring Schedule

PHILIPPINE MEASURES

Factual Evidence

Attachment 20	Joint CHED-MARINA Advisory No. 02 series of 2022
Attachment 20-A	Revised Course Syllabus for Celestial Navigation (NAV 4) under JCMA No. 02, s. 2022
Attachment 20-B	Revised Course Syllabus for Voyage Planning (NAV 7) under JCMA No. 02, s. 2022
Attachment 20-C	Revised Course Syllabus for Leadership and Teamwork (Mngt 1) under JCMA No. 02, s. 2022
Attachment 21	Timeline of Activities for the Revision of Detailed Teaching Syllabus pursuant to under JCMA No. 02, s. 2022 No. 02, s. 2022
Attachment 38	Calibration Workshop on Conducting Audits and Report Writing dated 28 August 2021
Attachment 39	Post Activity Report of the Calibration Workshop dated 09 February 2022
Attachment 40	Timeline of Activities for the Capacity Building
Attachment 41	MARINA Letter to IMO regarding Request Further Assistance to the Philippines dated 02 February 2022
Attachment 42	IMO TCD Letter to MARINA dated 04 February 2022
Attachment 44	Project Advancing Competencies for Excellence (ACE)

Maritime Higher Education Institutions

SHORTCOMING 3

Therefore, the Philippines' authorities do not ensure that the programmes delivered by the MHEIs are fully structured and include the methods and media of delivery, procedures, and course material as necessary to achieve the prescribed standards of competence, as required by the STCW Convention and Code.

The following deficiencies were found in the course syllabi developed by the visited MHEIs and approved by CHED and MARINA:

Grievance 6

Several course syllabi do not specify fundamental references and study materials concerning the addressed KUPs and included obsolete references and topics

- Table A-II/2 of Section A-II/2 of the STCW Code includes the competence “Plan and ensure safe loading, stowage, securing, care during the voyage and unloading of cargoes” and requires in its column 2 KUP on ‘Ability to establish procedures for safe cargo handling in accordance with the provisions of the relevant instruments such as IMDG Code, IMSBC Code, MARPOL 73/78 Annexes III and V and other relevant information’.
- Table A-II/2 of Section A-II/2 of the STCW Code includes the competence “Monitor and control compliance with legislative requirements and measures to ensure safety of life at sea, security and the protection of the marine environment” and the necessary KUPs for this competence.

However, the syllabus of the course delivered by the PMI Colleges addressing the function ‘Cargo handling and stowage at the management level’ including dangerous goods, which is designed to cover the above-mentioned competence does not include the International Maritime Solid Bulk Cargoes (IMSBC) Code as reference material, which is required by the KUPs for the competence referred to above. Hence, the lack of this reference material does not ensure that the prescribed standard of competence is achieved.

However, the syllabi of the courses ‘SEAM 2’ and ‘SEAM 6’ offered by Cristal E-College and the syllabus of the course ‘SEAM 122’ delivered by the University of Cebu, which were designed to address the above-mentioned competences, do not include the International Code on Intact Stability, 2008, and the International Convention on Load Lines, 1966, as reference material for those courses, as required by the KUPs specified in column 2 of Table A-II/2 of Section A-II/2 of the STCW Code for the competence referred to above. Hence, the lack of this reference material does not ensure that the prescribed standard of competence is achieved.

- Table A-II/1 of Section A-II/1 of the STCW Code includes the competence “Monitoring the loading, stowage, securing, care during the voyage and the unloading of cargoes” and Table A-II/2 of Section A-II/2 of the STCW Code includes the competence “Plan and ensure safe loading, stowage, securing, care during the voyage and unloading of cargoes”, as well as the necessary KUPs for this competence.

However, the syllabi of several courses dealing with cargo work with dangerous goods delivered by Our Lady of Fatima University, which address the above-mentioned competences, do not require the use of the IMDG Code for teaching cargo handling and stowage involving dangerous goods, as required by columns 2 of Tables A-II/1 and A-II/2 for the competences referred to above. Hence, the lack of this reference material does not ensure that the prescribed standard of competence is achieved.

Hence, the MHEIs referred to above do not ensure compliance with the prescribed standards of competence.

PHILIPPINE MEASURES

Immediate Measures

1. The Joint TWG created by CHED and MARINA has comprehensively reviewed and revised Annex C - Course Specifications for BSMT and BSMarE of CMO No. 14, series of 2018 entitled "Addendum to CMO 67 series of 2017 entitled revised Policies, Standards and Guidelines for the BSMT and BSMarE programs" to address the missing KUPs noted in the ECAR and to ensure that all the KUPs under the relevant table of the STCW Code are sufficiently covered.

Based on the revised course specifications, the MHEIs were directed through Joint CHED-MARINA Advisory No. 02, series of 2022 to review and revise their detailed teaching syllabi in conformity with the revised course specifications to be submitted no later than 15 May 2022. The revised detailed syllabi submitted by MHEIs shall be evaluated and approved for implementation for Academic Year 2022-2023.

Moreover, MHEIs are directed to update educational reference material following CMO 22, s. 2021 "Minimum Requirements for Libraries of Higher Education Institutions Common to All Programs."

For the courses Seam 2 and Seam 6, MHEIs were also directed to acquire the stress calculating equipment/computer and appropriate software to calculate vessel stability and trim (applications) to address the Course Outcomes, and other required equipment for courses identified, cognizant of the policies and standards on carrying capacity. ([Attachment 20](#), [Attachment 20-A](#), [Attachment 20-B](#), [Attachment 20-C](#), [Attachment 21](#))

PHILIPPINE MEASURES

Immediate Measures

2. JCMCMC No. 01 s. 2022 ([Attachment 01](#), [Attachment 01-F](#)) requires MHEIs to ensure that the detailed teaching syllabi contain and use relevant and updated learning materials, appropriate laboratory equipment, and practical exercises equipment. Further, it requires MHEIs to ensure the effectiveness of their quality system by guaranteeing the availability, accessibility, and use of relevant and updated publications, to include printed/electronically formatted instructional materials, books, and other related references, pursuant to the standards on library holding. This will ensure that the students will acquire the necessary KUPs prescribed by the STCW Code.

Way Forward

3. CHED and MARINA will continue to conduct Capacity Building activities for their personnel particularly in respect of evaluation and inspection, and monitoring. These trainings will be undertaken at least twice a year and as may be deemed necessary, to ensure shared understanding of the requirements and manner of implementation of policies and standards, as well as rules and regulations. ([Attachment 38](#), [Attachment 39](#), and [Attachment 40](#))

In addition, the MARINA is currently coordinating with the IMO ([Attachment 41](#) and [Attachment 42](#)) for another round of training under the ITCP regarding the evaluation, inspection and monitoring of maritime education programs.

PHILIPPINE MEASURES

Factual Evidences

Attachment 20	Joint CHED-MARINA Advisory No. 02 series of 2022
Attachment 20-A	Revised Course Syllabus for Celestial Navigation (NAV 4) under JCMA No. 02, s. 2022
Attachment 20-B	Revised Course Syllabus for Voyage Planning (NAV 7) under JCMA No. 02, s. 2022
Attachment 20-C	Revised Course Syllabus for Leadership and Teamwork (Mngt 1) under JCMA No. 02, s. 2022
Attachment 21	Timeline of Activities for the Revision of Detailed Teaching Syllabus pursuant to under JCMA No. 02, s. 2022 No. 02, s. 2022
Attachment 01	JCMMC No. 01 s. 2022
Attachment 01-F	Annex F - Detailed Teaching Syllabus Template (Part D)
Attachment 38	Calibration Workshop on Conducting Audits and Report Writing dated 28 August 2021
Attachment 39	Post Activity Report of the Calibration Workshop dated 09 February 2022
Attachment 40	Timeline of Activities for the Capacity Building
Attachment 41	MARINA Letter to IMO regarding Request Further Assistance to the Philippines dated 02 February 2022
Attachment 42	IMO TCD Letter to MARINA dated 04 February 2022



KEY AREA TWO

**MONITORING, SUPERVISION
AND EVALUATION OF
TRAINING AND ASSESSMENT**

Monitoring, Supervision and Evaluation of Training and Assessment

SHORTCOMING 4

The Philippines' authorities, namely CHED and MARINA, do not sufficiently ensure through their monitoring system that all training and assessment activities carried out by the MET institutions, and the MHEIs in particular, are administered, conducted, monitored, evaluated and supervised, as required by the STCW Convention and the Code, and that such monitoring system fully ensures achievement of the defined objectives, as required by the STCW Convention, as well as achievement of the prescribed standards of competence, in line with the STCW Code.

Despite this system of supervision provided by CHED and MARINA, the EMSA inspectors identified several inconsistencies in application of the training framework outlined above, which CHED and MARINA had not identified through their monitoring activities.

Grievance 7

Some MHEIs do not systematically plan the courses and do not follow the lesson schedules or timetables

- Table A-II/1 of Section A-II/1 of the STCW Code requires under the competence “Maintain a safe navigational watch” the KUP on ‘Watchkeeping: Thorough knowledge of the content, application and intent of the International Regulations for Preventing Collisions at Sea, 1972, as amended’. It also requires under the competence “Transmit and receive information by visual signalling” the KUP on ‘Visual signalling: Ability to use the International Code of Signals’.

However, the Philippine Merchant Marine Academy does not develop a plan for conducting the practical exercises and activities referred to in the relevant syllabus of the course on the Collision Regulations (COLREGs). Practical exercises are essential to ensure that the required knowledge, understanding and proficiency is actually acquired, assessed and demonstrated in conformity with the evaluation criteria and the methods for demonstrating those competences of practical instruction and/or simulation, approved laboratory equipment training and approved simulator training, where appropriate, required in columns 4 and 3, respectively, of Table A-II/1 of Section A-II/1 of the STCW Code.

Therefore, there is no guarantee that the knowledge of application of the Collision Regulations is actually provided to students that need to complete this course in order to achieve the above-mentioned competences of Table A-II/1 of Section A-II/1 of the STCW Code.

- Table A-II/1 of Section A-II/1 of the STCW Code includes the competence “Application of leadership and teamworking skills”. **However, the Philippine Merchant Marine Academy does not have plans for delivering the course on leadership and teamworking, which was designed to address the above-mentioned competence established in Table A-II/1 of Section A-II/1 of the STCW Code.**

Hence, the lack of teaching plans means that the prescribed standards of competence are not guaranteed to be achieved, as required by Section A-II/1 of the STCW Code.

PHILIPPINE MEASURES

Immediate Measures

1. CHED-MARINA notified the Philippine Merchant Marine Academy (PMMA) ([Attachment 34](#)) of the specific findings noted in the ECAR. The MHEI was required to explain and give comments on the findings and to submit a corrective action plan to address the findings and prevent recurrence. On 30 January 2022, the PMMA submitted documents which were subsequently reviewed and evaluated by MARINA. Results of evaluation revealed that the PMMA was not able to address this specific grievance.
2. Joint TWG created by CHED and MARINA has comprehensively reviewed and revised Annex C - Course Specifications for BSMT and BSMarE of CMO No. 14, series of 2018 entitled “Addendum to CMO 67 series of 2017 entitled revised Policies, Standards and Guidelines for the BSMT and BSMarE programs” to address the missing KUPs noted in the ECAR and to ensure that all the KUPs under the relevant table of the STCW Code are sufficiently covered.

The Administration through CHED informed PMMA of the results of the evaluation of their compliance documents ([Attachment 34-E](#)). Moreover, these were verified in the regular monitoring conducted from March 01 to 04, 2022. The monitoring report is expected to be generated before the end of March. If found non-compliant and have failed to address the noted shortcomings within the prescribed period, a Show Cause Order will be issued in accordance with existing policies, rules, and regulations.

Based on the revised course specifications, the MHEIs were directed through Joint CHED-MARINA Advisory No. 02, series of 2022 to review and revise their detailed teaching syllabi in conformity with the revised course specifications to be submitted no later than 15 May 2022. The revised detailed syllabi submitted by MHEIs shall be evaluated and approved for implementation for Academic Year 2022-2023.

For the courses Seam 2 and Seam 6, MHEIs were also directed to acquire the stress calculating equipment/computer and appropriate software to calculate vessel stability and trim (applications) to address the Course Outcomes, and other required equipment for courses identified, cognizant of the policies and standards on carrying capacity. ([Attachment 20](#), [Attachment 20-A](#), [Attachment 20-B](#), [Attachment 20-C](#), [Attachment 21](#))

PHILIPPINE MEASURES

Immediate Measures

3. CHED-MARINA issued JCMMC No. 03, s. 2022 ([Attachment 03](#)), which contains the revised Guidelines on Joint CHED-MARINA monitoring of BSMT and BSMarE Programs. This provides an enhanced system to ensure that education programs are structured in accordance with the requirements of the STCW Convention and that appropriate mechanisms are in place for better supervision and monitoring of MHEIs.
4. CHED-MARINA has approved the JCMMC No. 01 series of 2022 ([Attachment 01](#)), which now provides a provision under Section 13 that *“MHEIs shall ensure sufficiency and appropriateness of practical exercises and assessment of a course based on the learning outcomes and ensure that all learning outcomes requiring practical exercises are attained by the students, subject to evaluation, inspection, verification and monitoring by the Inspection Team organized by CHED and MARINA.”* Further, *MHEIs are required, under item 15 of Section 42.2 to include a “policy and procedure on the design and development, review and verification, validation and approval of laboratory equipment/simulator exercises and assessment.”*

Relative to this, CHED-MARINA prepared and approved the Annual Monitoring Program of MHEIs for CY 2022 ([Attachment 22](#)) prioritizing the 11 MHEIs visited by EMSA and those issued with phase-out order. Likewise, the Joint CHED-MARINA list of MHEIs to be monitored for Years 2022-2024 was also approved ([Attachment 45](#)). All joint monitoring activities starting AY 2022-2023 will be conducted in accordance with the guidelines in JCMMC No. 03, S-2022 and will use the enhanced Outcomes Based Monitoring Instrument (OBMI) ([Attachment 03-E](#)).

Analysis of monitoring results will be used as a basis in coming up with recommendations to solve any identified weakness in the system based on the identified gaps.

5. To ensure that MHEIs are appropriately guided in the planning of their practical/laboratory exercises and ascertain the achievement of the prescribed learning outcomes (training objectives), CHED and MARINA have identified the necessary elements that must be incorporated in the practical exercise plan. A template with sample entries is provided and incorporated in the Detailed Teaching Syllabus under Teaching Aid to provide a more holistic approach to planning. ([Attachment 01-F](#))

PHILIPPINE MEASURES

Way Forward

- 6.** Other MHEIs will likewise be subjected to regular monitoring based on the approved Annual Monitoring Program ([Attachment 22](#)) for CY 2022 using the prescribed OBMI that was enhanced to include specific objective evidence to guide the evaluator in the conduct of monitoring.
- 7.** CHED and MARINA will continue to conduct Capacity Building activities for their personnel particularly in respect of evaluation and inspection, and monitoring. These trainings will be undertaken at least twice a year and as may be deemed necessary, to ensure shared understanding of the requirements and manner of implementation of policies and standards, as well as rules and regulations. ([Attachment 38](#), [Attachment 39](#), and [Attachment 40](#))

The shortcomings that will be raised in the joint monitoring activities will be processed in accordance with the existing rules and regulations. If found non-compliant and have failed to address the shortcomings noted within the prescribed period, a Show Cause Order will be issued in accordance with existing policies, rules, and regulations.

In addition, the MARINA is currently coordinating with the IMO ([Attachment 41](#) and [Attachment 42](#)) for another round of training under the ITCP regarding the evaluation, inspection and monitoring of maritime education programs.

PHILIPPINE MEASURES

Factual Evidences

Attachment 34	CHED Memorandum from the Office of the Executive Director No. 78-2022
Attachment 34-E	PMMA Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 20	Joint CHED-MARINA Advisory No. 02 series of 2022
Attachment 20-A	Revised Course Syllabus for Celestial Navigation (NAV 4) under JCMA No. 02, s. 2022
Attachment 20-B	Revised Course Syllabus for Voyage Planning (NAV 7) under JCMA No. 02, s. 2022
Attachment 20-C	Revised Course Syllabus for Leadership and Teamwork (Mngt 1) under JCMA No. 02, s. 2022
Attachment 21	Timeline of Activities for the Revision of Detailed Teaching Syllabus pursuant to under JCMA No. 02, s. 2022 No. 02, s. 2022
Attachment 03	JCMMC No. 03, series of 2022
Attachment 22	Annual Monitoring Program for CY 2022
Attachment 45	Joint CHED-MARINA List of MHEIs to be Monitored for 2022-2024
Attachment 03-E	Annex E: Outcomes-Based Monitoring Instrument
Attachment 01	JCMMC No. 01 series of. 2022
Attachment 01-F	Annex F - Detailed Teaching Syllabus Template (Part D)
Attachment 38	Calibration Workshop on Conducting Audits and Report Writing dated 28 August 2021
Attachment 39	Post Activity Report of the Calibration Workshop dated 09 February 2022
Attachment 40	Timeline of Activities for the Capacity Building
Attachment 41	MARINA Letter to IMO regarding Request Further Assistance to the Philippines dated 02 February 2022
Attachment 42	IMO TCD Letter to MARINA dated 04 February 2022



SHORTCOMING 4

The Philippines' authorities, namely CHED and MARINA, do not sufficiently ensure through their monitoring system that all training and assessment activities carried out by the MET institutions, and the MHEIs in particular, are administered, conducted, monitored, evaluated and supervised, as required by the STCW Convention and the Code, and that such monitoring system fully ensures achievement of the defined objectives, as required by the STCW Convention, as well as achievement of the prescribed standards of competence, in line with the STCW Code.

Despite this system of supervision provided by CHED and MARINA, the EMSA inspectors identified several inconsistencies in application of the training framework outlined above, which CHED and MARINA had not identified through their monitoring activities.

Grievance 8

Practical training at laboratories and workshops not carried out by MHEIs as specified in the course syllabi

Regulations 1/6 and 1/8 of the STCW Convention require that the training is conducted, monitored, evaluated and supervised to ensure achievement of the defined objectives.

- The syllabus of the course 'Nav225' delivered by the University of Cebu specifies that 26 practical sessions should have been conducted between November 2019 and February 2020.

However, according to the records kept, only 20 sessions were carried out.

- The syllabus of the course on ECDIS delivered by BIT International College requires 48 simulator hours.

However, the records kept showed that only 35 simulator hours were conducted.

- The syllabus of the course 'SEAM4' delivered by BIT International College requires 15 hours of laboratory time to be conducted between July and October 2019.

However, only nine hours were actually delivered and no recovery arrangement was established.

- The syllabus of the course 'Nav213' delivered by the University of Cebu requires laboratory training.

However, only 60% of the laboratory teaching time was actually conducted.

- The syllabus of the course 'Nav 5' on navigation delivered by the Cristal E-College requires 31 sessions on the use of the Radar and ARPA simulator.

However, the records on the use of the Radar and ARPA simulator by the students showed that two different classes (randomly chosen) did not carry out three and seven simulator sessions respectively out of the 31.

- The course syllabi at the PNTC Colleges requires 1.5 hours for a laboratory session for a class of around 39 students.

However, the class was divided into three groups of 13 students. Each student group attended a laboratory session for half an hour, while the other two students' groups were self-studying in the classroom or in the library.

- The syllabus of the course on deck watchkeeping delivered by the Our Lady of Fatima University specifies the training time in the navigation laboratory. **However, the actual training time carried out in the navigation laboratory was half the time specified in the syllabus because the carrying capacity of the navigation laboratory had not been calculated. Furthermore, there was no evidence of attendance or delivery of any training at the laboratories in the Our Lady of Fatima University.**
 - The course syllabus on voyage planning delivered by the John B. Lacson Foundation Maritime University requires the BMST students to prepare and evaluate route plans fully, considering all conditions. **However, the students were required to complete only one exercise on voyage planning, focusing on inserting waypoints, which is not consistent with the exercises specified in the relevant course syllabus.**
 - The course syllabi in John B. Lacson Foundation Maritime University require the use of simulators, laboratories and equipment. **However, the students use those facilities only half of the training time specified in the course syllabi.**
- Hence, as evidenced by the fact that practical training at laboratories and workshops carried out by the above MHEIs do not follow the course syllabi, the MHEIs, MARINA and CHED do not fully ensure that the training is conducted, monitored, evaluated and supervised, as required by Regulation I/6 of the STCW Convention and Section A-I/6.1 of the STCW Code, and do not fully ensure a continuous monitoring of all training and assessment activities to ensure achievement of the defined objectives, as required by Regulation I/8.**

PHILIPPINE MEASURES

Immediate Measures

- KEY AREA 2**
1. CHED-MARINA notified the University of Cebu, BIT International College, Cristal E-College, PNTC Colleges, Our Lady of Fatima University, and John B. Lacson Foundation Maritime University ([Attachment 34](#)) of the specific findings noted in the ECAR. The MHEIs were required to explain and give comments on the findings and to submit a corrective action plan to address the findings and prevent recurrence.
- On 28 January 2022, the University of Cebu ([Attachment 34-B](#)) submitted compliance documents which were subsequently reviewed and evaluated. The Nav225 Syllabus indicates a total of twenty (20) practical exercises (EPLANs 1, 2, 3A, 3B, 3C, 3, 4A, 4B, 4C, 4, 5A, 5B, 5, 6, 7, 8, 9, 10A, 10B and 10) and the corresponding Exercise Plans (20) were provided. However, it is not indicated if this number of practical exercises were reduced from what EMSA discovered as 26 at the time of their inspection. As such UC-METC needs to provide explanation as to how EMSA was able to state that there were 26 practical sessions that should have been conducted from Nov. 2019 to Feb. 2020. Therefore, based on the factual evidence submitted, the evaluation team concludes that the specific finding has not been sufficiently addressed.
 - The course requires 6 lab hours per week based on the syllabus and the Course Specifications (CMO 14, s.2018). However, all practical exercises have a total duration of 45 minutes only which are to be “carried out and performed individually at home” using table, parallel ruler/protractor triangle, technical compass, chart, pencil and eraser. Therefore, based on the factual evidence submitted, the evaluation team concludes that the specific finding has not been sufficiently addressed.
 - Based on the submitted documents of Our Lady of Fatima University (OLFU) ([Attachment 34-C](#)) on 27 January 2022, it was noted that the Policies and Procedures on Carrying Capacity were not provided, preventing the thorough verification of the action taken by the MHEI. Therefore, based on the factual evidence submitted, the evaluation team concludes that the specific finding has not been sufficiently addressed.

PHILIPPINE MEASURES

Immediate Measures

- **John B. Lacson Foundation Maritime University (JBLFMU)** ([Attachment 34-D](#)) submitted its compliance documents on 27 January 2022. Based on the evaluation, the said documents were inconsistent and therefore the institution's compliance cannot be fully determined.
- **BIT International College** ([Attachment 34-F](#)) submitted its compliance documents on 28 January 2022 which were subsequently reviewed and evaluated. As a result, it was found that there are lacking documents and as such, it cannot be established that this particular shortcoming has been addressed.
- **Cristal E-College** ([Attachment 34-C](#)) submitted its compliance documents on 28 January 2022. However, at the time of the evaluation, the electronic link containing the pieces of documentary evidence cannot be accessed. As such, there is no basis to evaluate the Cristal E-Colleges' compliance to this particular shortcoming. The pieces of documentary evidence shall be required and checked during the regular monitoring to be conducted on 07-12 March 2022.
- Lastly, **PNTC Colleges** ([Attachment 34-H](#)) submitted its compliance documents on 28 January 2022. Based on the evaluation, it was found out that the MHEI had enhanced its exercise plan where the element "cycle plan" was included therein. The cycle plan already states that all students undergoing laboratory will be given tasks/activities taking into account the carrying capacity requirement. Thus, none of them will be on standby-mode during laboratory activity. Therefore, based on the evidence submitted by PNTC Colleges, the evaluation team concludes that the specific finding has been sufficiently addressed.

The Administration through CHED informed the UC, OLFU, JBLFMU, BIT, Cristal E-College, and PNTC of the results of the evaluation and that the compliance of the MHEIs will be verified in the regular monitoring to be conducted from February to March 2022. The shortcomings that will be raised in the joint monitoring activities will be processed in accordance with the existing rules and regulations. If found non-compliant and have failed to address the shortcomings noted within the prescribed period, a Show Cause Order will be issued in accordance with existing policies, rules, and regulations.

PHILIPPINE MEASURES

Immediate Measures

2. CHED-MARINA issued JCMMC No. 03, s. 2022 ([Attachment 03](#)), which contains the revised Guidelines on Joint CHED-MARINA monitoring of BSMT and BSMarE Programs. This provides an enhanced system to ensure that education programs are structured in accordance with the requirements of the STCW Convention and that appropriate mechanisms are in place for better supervision and monitoring of MHEIs.
3. The Joint TWG created by CHED and MARINA has comprehensively reviewed and revised Annex C - Course Specifications for BSMT and BSMarE of CMO No. 14, series of 2018 entitled "Addendum to CMO 67 series of 2017 entitled revised Policies, Standards and Guidelines for the BSMT and BSMarE programs" to address the missing KUPs noted in the ECAR and to ensure that all the KUPs under the relevant table of the STCW Code are sufficiently covered.

Relative to this CHED-MARINA prepared and approved the Annual Monitoring Program of MHEIs for CY 2022 ([Attachment 22](#)) prioritizing the 11 MHEIs visited by EMSA and those issued with phase-out order.

Likewise, the Joint CHED-MARINA list of MHEIs to be monitored for Years 2022-2024 was also approved ([Attachment 45](#)). All joint monitoring activities starting AY 2022-2023 will be conducted in accordance with the guidelines in JCMMC No. 03, S-2022 and will use the enhanced Outcomes Based Monitoring Instrument (OBMI) ([Attachment 03-E](#)).

Analysis of monitoring results will be used as a basis in coming up with recommendations to solve any identified weakness in the system based on the identified gaps.

Based on the revised course specifications, the MHEIs were directed through Joint CHED-MARINA Advisory No. 02, series of 2022 to review and revise their detailed teaching syllabi in conformity with the revised course specifications to be submitted no later than 15 May 2022. The revised detailed syllabi submitted by MHEIs shall be evaluated and approved for implementation for Academic Year 2022-2023.

For the courses Seam 2 and Seam 6, MHEIs were also directed to acquire the stress calculating equipment/computer and appropriate software to calculate vessel stability and trim (applications) to address the Course Outcomes, and other required equipment for courses identified, cognizant of the policies and standards on carrying capacity. ([Attachment 20](#), [Attachment 20-A](#), [Attachment 20-B](#), [Attachment 20-C](#), [Attachment 21](#))

PHILIPPINE MEASURES

Immediate Measures

4. Article IV, Sections 8.3, 8.4 and 8.5 of JCMMC No. 01 series of 2022 ([Attachment 01](#)) now requires MHEIs to include in their QSS the policy and procedure for its own monitoring and supervision of implementation of the curricula. This shall be verified by CHED and MARINA through the conduct of joint monitoring activity to ensure the implementation and delivery of approved maritime program/s, in accordance with the policies, rules, regulations. Any non-compliance or deviation from the prescribed curricula shall be subjected to sanctions after due process.

Further, Article XI, Section 42.2.16 mandates MHEIs to cover in their respective QSS the policy and procedure on records keeping of the evidence/records that will demonstrate that the laboratory equipment were used and practical exercises/assessments have been implemented.
5. CHED-MARINA shall monitor and verify the compliance of the MHEIs with policies, standards, and guidelines (PSG) in the delivery of maritime education programs. The Outcomes Based Monitoring Instruments (OBMI) ([Attachment 03-E](#)) that is used in the conduct of monitoring has also been reviewed to ensure alignment with the revised PSG ([Attachment 01](#)).

PHILIPPINE MEASURES

Way Forward

- 6.** Other MHEIs will likewise be subjected to regular monitoring based on the approved Annual Monitoring Program ([Attachment 22](#)) for CY 2022 using the prescribed OBMI that was enhanced to include specific objective evidence to guide the evaluator in the conduct of monitoring. The shortcomings that will be raised in the joint monitoring activities will be processed in accordance with the existing rules and regulations. If found non-compliant and have failed to address the shortcomings noted within the prescribed period, a Show Cause Order will be issued in accordance with existing policies, rules, and regulations.
- 7.** MARINA will continue to conduct Capacity Building of its personnel on the conduct of evaluation and inspection, and monitoring, at least twice a year and as may be deemed necessary, to ensure shared understanding of the requirements and manner of implementation of policies and standards, as well as rules and regulations. ([Attachment 38](#), [Attachment 39](#), and [Attachment 40](#))
- In addition, the MARINA is currently coordinating with the IMO ([Attachment 41](#) and [Attachment 42](#)) for another round of training under the ITCP regarding the evaluation, inspection and monitoring of maritime education programs.

PHILIPPINE MEASURES

Factual Evidences

Attachment 34	Memorandum from the Office of the Executive Director No. 78-2022
Attachment 34-B	UC-METC Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-C	OLFU Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-D	JBLFMU Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-F	BIT International College's Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-G	Cristal E-College Compliance Detailed Evaluation with MARINA and CHED Communication Letters
Attachment 34-H	PNTC Colleges Compliance Detailed Evaluation with MARINA and CHED Communication Letters
Attachment 22	Annual Monitoring Program for CY 2022
Attachment 03	JCMMC No. 03, series of 2022
Attachment 45	Joint CHED-MARINA List of MHEIs to be Monitored for 2022-2024
Attachment 03-E	Annex E: Outcomes-Based Monitoring Instrument
Attachment 20	Joint CHED-MARINA Advisory No. 02 series of 2022
Attachment 20- A	Revised Course Syllabus for Celestial Navigation (NAV 4) under JCMA No. 02, s. 2022
Attachment 20-B	Revised Course Syllabus for Voyage Planning (NAV 7) under JCMA No. 02, s. 2022
Attachment 20-C	Revised Course Syllabus for Leadership and Teamwork (Mngt 1) under JCMA No. 02, s. 2022
Attachment 21	Timeline of Activities for the Revision of Detailed Teaching Syllabus pursuant to under JCMA No. 02, s. 2022 No. 02, s. 2022
Attachment 01	JCMMC No. 01 series of 2022
Attachment 38	Calibration Workshop on Conducting Audits and Report Writing dated 28 August 2021
Attachment 39	Post Activity Report of the Calibration Workshop dated 09 February 2022
Attachment 40	Timeline of Activities for the Capacity Building
Attachment 41	MARINA Letter to IMO regarding Request Further Assistance to the Philippines dated 02 February 2022
Attachment 42	IMO TCD Letter to MARINA dated 04 February 2022



SHORTCOMING 4

The Philippines' authorities, namely CHED and MARINA, do not sufficiently ensure through their monitoring system that all training and assessment activities carried out by the MET institutions, and the MHEIs in particular, are administered, conducted, monitored, evaluated and supervised, as required by the STCW Convention and the Code, and that such monitoring system fully ensures achievement of the defined objectives, as required by the STCW Convention, as well as achievement of the prescribed standards of competence, in line with the STCW Code.

Despite this system of supervision provided by CHED and MARINA, the EMSA inspectors identified several inconsistencies in application of the training framework outlined above, which CHED and MARINA had not identified through their monitoring activities.

Grievance 9

Students' attendance is not recorded systematically and reliably

Regulations 1/6 and 1/8 of the STCW Convention require that the training is conducted, monitored, evaluated and supervised to ensure achievement of the defined objectives.

Attendance at lectures and practical sessions is required to be recorded to monitor compliance with the limit of absences (not more than 20% of the total number of lectures and practical sessions).

However, the MHEIS do not ensure that records of attendance are kept systematically, in particular regarding practical training using laboratories and workshops:

- **The attendance records kept by the University of Cebu and by BIT International College showed that the number of absences of some students was over the limit and this was not considered for the purpose of establishing whether or not the students involved failed the course concerned, in line with the provisions of CMO No 40 of 2008.**

- **The Cristal E-College does not require its instructors to keep specific data or records of student attendance systematically or using a defined form for such purpose; therefore, the records available are unreliable.**
- **The attendance records kept by Baliwag Maritime Academy are unreliable. For instance, there were records corresponding to bank holidays when lectures and practical sessions were not held.**

Hence, as evidenced by the lack of monitoring of attendance of students, the MHEIs, MARINA and CHED do not fully ensure that the training is conducted, monitored, evaluated and supervised, as required by Regulation 1/6 of the STCW Convention and Section A-1/6.1 of the STCW Code, and do not fully ensure a continuous monitoring of all training and assessment activities to ensure achievement of the defined objectives, as required by Regulation 1/8.

PHILIPPINE MEASURES

Immediate Measures

1. CHED and MARINA notified the University of Cebu, BIT International College, Cristal E-College and Baliwag Maritime Academy ([Attachment 34](#)) of the specific findings noted in the ECAR. The MHEIs were required to explain and give comments on the findings and to submit a corrective action plan to address the findings and prevent recurrence.
 - Based on the documents submitted by **University of Cebu** ([Attachment 34-B](#)) on 27 January 2022, it was found out that the institution had established the following policies:
 - item 5.2 of “Procedure for Examination, Grading and Promotion System” (SP-DNS-021-05), a student is Dropped (DR) if incurred absences beyond the allowable limit.
 - in the 2019 Student Manual (p.26/140), a DROPPED (DR) mark is given to a student who failed to withdraw the subject and/or whose accumulated absences exceeds the allowable number of absences (20% of the total number of class days).
- What was not substantiated with factual evidence is the specific finding on “number of absences of some students was over the limit.” Based on the policies cited above, these students could have received a DR grade. Therefore, a copy of a Grade Sheet should be provided, supported with class record showing the absences incurred beyond the limit to prove that records of attendance are kept systematically. Therefore, based on the factual evidence submitted, the evaluation team concludes that the specific finding has not been sufficiently addressed.
- It is worthy to note that by virtue of CHED CEB Resolution 492-2020 dated 14 July 2020, BIT International College was notified of the closure through phase-out of its BSMT and BSMarE programs. While a Motion for Reconsideration was filed by the BIT, CHED issued CEB Resolution No. 214-2021 denying the same on 30 April 2021. Since the BIT still has existing Second and Third year students allowed to finish the program, it is still necessary to require BIT to rectify the findings in the ECAR and comply with the PSGs.

PHILIPPINE MEASURES

Immediate Measures

- BIT** ([Attachment 34-F](#)) submitted its compliance documents on 28 January 2022 which were subsequently reviewed and evaluated. It was noted in the evaluation that the sufficiency of the actions undertaken by BIT cannot be verified due to its failure to submit the following: a. Copy of policy on recording of attendance; b. Attendance records (particularly on practical training); c. Any records or measures undertaken for students incurring more than the allowable absences.
- Cristal E-College** ([Attachment 34-G](#)) submitted its compliance documents on 28 January 2022. The MHEI submitted policies and guidelines for online assessment and filled up attendance on SEAM 5R – Ship Handling and Maneuvering. However, only 1 attendance sheet was submitted which pertains to a class conducted online for lecture, which could not serve as a basis to fully establish that the MHEI has systematically kept the records of student attendance regarding practical training using laboratories and workshops. Therefore, based on the factual evidence submitted, the evaluation team concludes that the specific finding has not been sufficiently addressed.
 - Baliwag Maritime Academy** ([Attachment 34-I](#)) submitted their documents on 28 January 2022 such as QMS: Proc. 2; 1.1.8, Policy and Procedures regarding holidays and force majeure, Policy on Monitoring of Students Attendance (QMS: Proc. 2 No. 1; 1.8.1), Calendar of Activities for AY 2021-2022, Approved Make Up Plan December 11, 2021, Navigation 3, Recording of the Virtual Make Up Plan – December 11, 2021 and Attendance Record – Make up Class Dec. 11, 2021 Nav 3 B. However, based on the evaluation, the submitted pieces of factual evidence were not sufficient to address the specific finding.
- The Administration through CHED informed the UC, BIT, Cristal-E, and BMA of the results of the evaluation and that the compliance of the MHEIs will be verified in the regular monitoring to be conducted from February to March 2022. The shortcomings that will be raised in the joint monitoring activities will be processed in accordance with the existing rules and regulations. If found non-compliant and have failed to address the shortcomings noted within the prescribed period, a Show Cause Order will be issued in accordance with existing policies, rules, and regulations.

PHILIPPINE MEASURES

Immediate Measures

2. CHED-MARINA issued JCMMC No. 03, s. 2022 ([Attachment 03](#)), which contains the revised Guidelines on Joint CHED-MARINA monitoring of BSMT and BSMarE Programs. This provides an enhanced system to ensure that education programs are structured in accordance with the requirements of the STCW Convention and that appropriate mechanisms are in place for better supervision and monitoring of MHEIs.

Relative to this CHED-MARINA prepared and approved the Annual Monitoring Program of MHEIs for CY 2022 ([Attachment 22](#)) prioritizing the 11 MHEIs visited by EMSA. Likewise, the Joint CHED-MARINA list of MHEIs to be monitored for Years 2022-2024 was also approved ([Attachment 45](#)). All joint monitoring activities starting AY 2022-2023 will be conducted in accordance with the guidelines in JCMMC No. 03, S-2022 and will use the enhanced Outcomes Based Monitoring Instrument (OBMI) ([Attachment 03-E](#)). Analysis of monitoring results will be used as a basis in coming up with recommendations to solve any identified weakness in the system based on the identified gaps.
3. Section 42 Article XI of JCMMC No. 01 series of 2022 ([Attachment 01](#)) requires that the quality standards system of MHEIs cover the following policies and procedures:
 - 42.2.8 - policy on attendance and observance of holidays and unannounced holidays including remediation and make-up classes.
 - 42.2.13 - the need to retain and maintain, for at least three (3) years, documented information which may include documents, photos, audio and video recording and any other similar information to demonstrate the delivery and conduct of approved classrooms/laboratory activities and that the learners perform the course outcomes.
 - 42.2.16 - policy and procedure on records keeping of the evidences/records that will demonstrate that the laboratory equipment/simulator practical exercises and assessments have been implemented.

PHILIPPINE MEASURES

Way Forward

4. Other MHEIs will likewise be subjected to regular monitoring based on the approved Annual Monitoring Program ([Attachment 22](#)) for CY 2022 using the prescribed OBMI that was enhanced to include specific objective evidence to guide the evaluator in the conduct of monitoring.
5. CHED and MARINA will continue to conduct Capacity Building of its personnel on the conduct of evaluation and inspection, and monitoring, at least twice a year and as may be deemed necessary, to ensure shared understanding of the requirements and manner of implementation of policies and standards, as well as rules and regulations. ([Attachment 38](#), [Attachment 39](#), and [Attachment 40](#))

The shortcomings that will be raised in the joint monitoring activities will be processed in accordance with the existing rules and regulations. If found non-compliant and have failed to address the shortcomings noted within the prescribed period, a Show Cause Order will be issued in accordance with existing policies, rules, and regulations.

In addition, the MARINA is currently coordinating with the IMO ([Attachment 41](#) and [Attachment 42](#)) for another round of training under the ITCP regarding the evaluation, inspection and monitoring of maritime education programs.

PHILIPPINE MEASURES

Factual Evidences

Attachment 34	CHED Memorandum from the Office of the Executive Director No. 78-2022
Attachment 34-B	UC-METC Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-F	BIT International College's Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-G	Cristal E-College Compliance Detailed Evaluation with MARINA and CHED Communication Letters
Attachment 34-I	BMA Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 03	JCMMC No. 03, series of 2022
Attachment 22	Annual Monitoring Program for CY 2022
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Attachment 42	IMO TCD Letter to MARINA dated 04 February 2022



SHORTCOMING 4

The Philippines' authorities, namely CHED and MARINA, do not sufficiently ensure through their monitoring system that all training and assessment activities carried out by the MET institutions, and the MHEIs in particular, are administered, conducted, monitored, evaluated and supervised, as required by the STCW Convention and the Code, and that such monitoring system fully ensures achievement of the defined objectives, as required by the STCW Convention, as well as achievement of the prescribed standards of competence, in line with the STCW Code.

Despite this system of supervision provided by CHED and MARINA, the EMSA inspectors identified several inconsistencies in application of the training framework outlined above, which CHED and MARINA had not identified through their monitoring activities.

Grievance 10

'Carrying capacities' are not calculated or not consistent with the number of students admitted to courses

Regulation 1/6 of the STCW Convention requires that the training is conducted, monitored, evaluated and supervised and is provided with the media of delivery and procedures as are necessary to achieve the prescribed standard of competence.

The term ‘carrying capacity’ is defined as the maximum number of students for each of the defined specific facilities available at a given MHEI and used for training activities during programme courses in a given semester. The JCMMC No 1 of 2019 Section 32 requires all MHEIs to establish such ‘carrying capacity’. However, the EMSA inspectors found that the carrying capacity in two of the visited MHEIs was not consistent with the number of students admitted to and enrolled in the programmes and one MHEI had not established any carrying capacity:

- The carrying capacities for the navigation chart laboratory and for the navigation simulator at the PNTC Colleges were 480 and 264 students, respectively, considering that the students using those facilities were registered in the relevant courses of the first and second programme year. **However, the PNTC Colleges enrolled a total of 838 students for the first and second years of the BSMT programme, respectively, in the previous academic year, which clearly exceeded the above carrying capacities.**

- Although the carrying capacities calculated by the Baliwag Maritime Academy for the automatic control laboratory and for the diesel engine laboratory was 22 and 8 students respectively, the students’ groups assigned to those facilities included 27 and 20 students, respectively.

The effect of not respecting the established carrying capacity was that the students ended up using the automation equipment for training for only one hour instead of the three hours required by the course syllabus.

- **The Our Lady of Fatima University had not calculated the carrying capacity for any of the facilities and equipment used for training at all.**

Hence, MARINA and CHED do not ensure, through their supervision, that the ‘carrying capacities’ are calculated and consistent with the number of students admitted and enrolled to courses. Therefore, MARINA and CHED, do not fully ensure that the training is conducted, monitored and supervised, as required by Regulation 1/6 of the STCW Convention and Section A-1/6.1 of the STCW Code and that the training is provided with the media of delivery and procedures as are necessary to achieve the prescribed standard of competence, as required by Section A-1/6.1.1.

PHILIPPINE MEASURES

Immediate Measures

1. MARINA-CHED notified PNTC Colleges, Our Lady of Fatima University and Baliwag Maritime Academy ([Attachment 34](#)) of the specific findings noted in the ECAR. They were required to explain and give comments on the findings and to submit a corrective action plan to address the findings and prevent recurrence.
- **OLFU** submitted its compliance documents on 27 January 2022 ([Attachment 34-C](#)). Based on a review of the documents, the evaluators noted that only their Enrollment report for 1st year level was submitted, preventing a thorough evaluation to determine OLFU's compliance to equipment carrying capacity.
- **PNTC Colleges** ([Attachment 34-H](#)) submitted its compliance documents on 28 January 2022. Based on the review of the submitted documents, it was noted that the MHEI had exceeded its carrying capacity. Based on Form 1-Carrying Capacity/1st semester, the carrying capacity value of students for 2nd year in terms of Bridge Simulator is 360 students while that of the Enrollment Report for Academic Year 2021-2022 is 408. There were 48 students in excess of the carrying capacity. Therefore, based on the factual evidence submitted, the evaluation team conclude that the specific finding has not been sufficiently addressed.
- **Baliwag Maritime Academy (BMA)** ([Attachment 34-I](#)) submitted its compliance documents on 28 January 2022. Based on the review of the submitted documents, it was noted that:
 - The institution did not use the other prescribed forms in the computation of the carrying capacity such as Form 2: Equipment Utilization Forms 3. Summary of Practical Exercises 4. Weekly Schedule of Classes.

PHILIPPINE MEASURES

Immediate Measures

- The quantity of the equipment specified in the grievance: those for automatic control laboratory and those for the diesel engine laboratory, per Form 1 is inconsistent with the Updated Inventory submitted by the school. Therefore, based on the factual evidence submitted, the evaluation team concludes that the specific finding has been sufficiently addressed.
- The institution submitted its designed form, Form 3, with filename, 1st class form2. The form shows how the laboratory hours are assigned to the courses per batch, (Batch 1) and per group (Groups A, B, C). For the course PPD with 3 laboratory hours per week (per Form 1), the form shows the laboratory time for each group on January 21, 2021: A - from 0800 to 1000, B – from 1300 to 1500, C- from 1000 to 1200), or 2 laboratory hours per group. However, the institution did not provide documents or records showing how the remaining one (1) hour of the 3 hours required for the week was assigned. The Administration through CHED informed the PNTC, OLFU and BMA of the results of the evaluation and that the compliance of the MHEIs will be verified in the regular monitoring which will be conducted from February to March 2022. The shortcomings that will be raised in the joint monitoring activities will be processed in accordance with the existing rules and regulations. If found non-compliant and have failed to address the shortcomings noted within the prescribed period, a Show Cause Order will be issued in accordance with existing policies, rules, and regulations.

PHILIPPINE MEASURES

Immediate Measures

2. CHED- MARINA issued JCMMC No. 03, s. 2022 ([Attachment 03](#)), which contains the revised Guidelines on Joint CHED-MARINA monitoring of BSMT and BSMarE Programs. This provides an enhanced system to ensure that education programs are structured in accordance with the requirements of the STCW Convention and that appropriate mechanisms are in place for better supervision and monitoring of MHEIs.

Relative to this CHED-MARINA prepared and approved the Annual Monitoring Program of MHEIs for CY 2022 ([Attachment 22](#)) prioritizing the 11 MHEIs visited by EMSA and those issued with phase-out order. Likewise, the Joint CHED-MARINA list of MHEIs to be monitored for Years 2022-2024 was also approved ([Attachment 45](#)).

All joint monitoring activities starting AY 2022-2023 will be conducted in accordance with the guidelines in JCMMC No. 03, S-2022 and will use the enhanced Outcomes Based Monitoring Instrument (OBMI) ([Attachment 03-E](#)). Analysis of monitoring results will be used as a basis in coming up with recommendations to solve any identified weakness in the system based on the identified gaps.

3. MARINA- CHED issued Joint CHED-MARINA Advisory No. 02 series of 2022 ([Attachment 20](#)), directing MHEIs to submit to MARINA STCW Office through CHED's Office of Programs and Standards Development (OPSD) the carrying capacity computation, list of available equipment being used for the conduct of practical/laboratory exercises and assessment, and QSS procedure on the computation and observance of carrying capacity.

PHILIPPINE MEASURES

Immediate Measures

4. Section 42.2.14 Article XI of JCMMC No. 1 s. 2022 ([Attachment 01](#)) requires MHEIs to establish policy and procedure on the standard carrying capacity computation signed by the Head of Department and the Dean which will serve as the basis of their registrar on the maximum number of students to be enrolled using the carrying capacity forms and the provision on equipment to student ratio.

This will ensure that students are given sufficient exposure to the equipment or simulators for training or assessment to ensure attainment of the required outcomes. Further, Section 27 Article VIII of the the same JCMMC now requires MHEIs to submit to CHED-OPSD, copy furnished MARINA STCW Office, the duly accomplished and notarized carrying capacity forms (1 to 4) as reflected in Annex I of the JCMMC two months before the start of the academic year. Thereafter, no changes on the carrying capacity shall be allowed.

PHILIPPINE MEASURES

Way Forward

5. Other MHEIs will likewise be subjected to regular monitoring based on the approved Annual Monitoring Program ([Attachment 22](#)) for CY 2022 using the prescribed OBMI that was enhanced to include specific objective evidence to guide the evaluator in the conduct of monitoring.
6. CHED and MARINA will continue to conduct Capacity Building of its personnel on the conduct of evaluation and inspection, and monitoring, at least twice a year and as may be deemed necessary, to ensure shared understanding of the requirements and manner of implementation of policies and standards, as well as rules and regulations. ([Attachment 38](#), [Attachment 39](#), and [Attachment 40](#))

The shortcomings that will be raised in the joint monitoring activities will be processed in accordance with the existing rules and regulations. If found non-compliant and have failed to address the shortcomings noted within the prescribed period, a Show Cause Order will be issued in accordance with existing policies, rules, and regulations.

In addition, the MARINA is currently coordinating with the IMO ([Attachment 41](#) and [Attachment 42](#)) for another round of training under the ITCP regarding the evaluation, inspection and monitoring of maritime education programs.

PHILIPPINE MEASURES

Factual Evidences

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Attachment 41	MARINA Letter to IMO regarding Request Further Assistance to the Philippines dated 02 February 2022
Attachment 42	IMO TCD Letter to MARINA dated 04 February 2022

KEY AREA THREE

**EXAMINATION AND
ASSESSMENT OF
COMPETENCE**

Examination and Assessment of Competence

SHORTCOMING 5

Therefore, the Philippines' authorities do not fully ensure that the system in place for conducting the practical assessment of competence of seafarers is structured and include the methods, means of delivery and procedures as necessary to provide the demonstration of competence and the criteria to evaluate the competence required under the STCW Code for the competences concerned and provides assurance that the candidates for certification have achieved the prescribed standards of competence, as required by the STCW Code.

The EMSA inspectors identified inconsistencies concerning the activities for practical assessment for certification.

Grievance 11

Lack of use of laboratory equipment in practical examination

Table A-III/1 of the STCW Code requires for demonstrating the competence “Maintenance and repair of electrical and electronic equipment” the following methods: ‘Examination and assessment of evidence obtained from one or more of the following:

- .1 approved workshop skills training
- .2 approved practical experience and tests
- .3 approved in-service experience
- .4 approved training ship experience’.

Table A-III/1 requires for demonstrating the competence “Appropriate use of hand tools, machine tools and measuring instruments for fabrication and repair on board” the following methods: ‘Assessment of evidence obtained from one or more of the following:

- .1 approved workshop skills training
- .2 approved practical experience and tests
- .3 approved in-service experience
- .4 approved training ship experience’.

Table A-III/2 of the STCW Code requires for demonstrating the competence “Manage troubleshooting, restoration of electrical and electronic control equipment to operating condition” the following methods: ‘Examination and assessment of evidence obtained from one or more of the following:

- .1 approved in-service experience
- .2 approved training ship experience
- .3 approved simulator training, where appropriate
- .4 approved laboratory equipment training’.

Table A-III/2 of the STCW Code requires for demonstrating the competence “Manage safe and effective maintenance and repair procedures” the following methods: ‘Examination and assessment of evidence obtained from one or more of the following:

- .1 approved in-service experience
- .2 approved training ship experience
- .3 approved workshop training’.

Table A-III/2 of the STCW Code for demonstrating the competence “Detect and identify the cause of machinery malfunctions and correct faults” requires the following methods: ‘Examination and assessment of evidence obtained from one or more of the following:

- .1 approved in-service experience
- .2 approved training ship experience
- .3 approved simulator training, where appropriate
- .4 approved laboratory equipment training’.

In line with the STCW Code, the ‘competency mapping’, included in the MARINA STCW Circular 2018-09, requires for the assessment of competence the use of laboratory equipment. More precisely, the assessment system is based on workshop skills training and practical experience and tests (using laboratory equipment according to MARINA).

However, during its monitoring of the Assessment Centres (hereafter - ACs), MARINA is not requiring them to conduct the practical assessment of the above-mentioned competences of Tables A- III/1 and A-III/2 of the STCW Code using laboratory equipment, as required therein.

SHORTCOMING 5

Therefore, the Philippines' authorities do not fully ensure that the system in place for conducting the practical assessment of competence of seafarers is structured and include the methods, means of delivery and procedures as necessary to provide the demonstration of competence and the criteria to evaluate the competence required under the STCW Code for the competences concerned and provides assurance that the candidates for certification have achieved the prescribed standards of competence, as required by the STCW Code.

The EMSA inspectors identified inconsistencies concerning the activities for practical assessment for certification.

Grievance 12

Inconsistent theoretical and practical assessment of competences

Table A-III/1 of Section A-III/1 of the STCW Code under the competence “Operate main and auxiliary machinery and associated control systems” requires KUP on ‘basic construction and operation principles of machinery systems, including:

- 1) marine diesel engines;
- 2) marine steam turbines;
- 3) marine gas turbines;
- 4) marine boilers;
- 5) shafting installations, including propellers;
- 6) other auxiliaries, including various pumps, air compressor, purifier, fresh water generator, heat exchanger, refrigeration, air-conditioning and ventilation systems;
- 7) steering gear;
- 8) automatic control systems;
- 9) fluid flow and characteristics of lubricating oil, fuel oil and cooling systems;
- 10) deck machinery’.

Table A-III/1 of Section A-III/1 of the STCW Code under the competence “Operate electrical, electronic and control systems” requires KUP on ‘basic configuration and operation principles of the following electrical, electronic and control equipment:

- 1) electrical equipment:
 - 1c) electrical motors including starting methodologies;
 - 1d) high voltage installations;
 - 1e) sequential control systems and associated system devices;
- 2) electronic equipment:
 - 2a) characteristics of basic electronic circuit elements;
 - 2b) flowchart for automatic and control system;
 - 2c) functions, characteristics and features of control systems for machinery items, including main propulsion plant operation control and steam boiler automatic controls;
- 3) control systems:
 - 3b) proportional-integral-derivative (PID) control characteristics and associated system devices for process control’.

Table A-III/2 of Section A-III/2 of the STCW Code under the competence “Manage the operation of propulsion plant machinery” requires KUP on ‘design features, and operative mechanism of the following machinery and associated auxiliaries:

1. Marine diesel engine;
2. Marine steam turbine;
3. Marine gas turbine;
4. Marine steam boiler’.

Table A-III/2 of Section A-III/2 of the STCW Code under the competence “Manage operation of electrical and electronic control equipment” requires the KUPs on ‘design features and system configurations of automatic control equipment and safety devices for the following:

1. Main engine;
2. Generator and distribution system;
3. Steam boiler’.

Tables A- III/1 and A-III/2 of Sections A-III/1 and A-III/2 of the STCW Code require as methods for demonstrating the above competences and assessing the above KUPs ‘examination and assessment of evidence obtained from one or more of the following:

- 1) approved in-service experience;
- 2) approved training ship experience;
- 3) approved simulator training, where appropriate;
- 4) approved laboratory equipment training’.

However, the requirement of the ‘competency mapping’ to assess some of the competences and KUP items by theoretical methods, as well as some of those by using either a simulator or laboratory equipment, is not consistent with the methods for demonstrating those competences required in Tables A-III/1 and A-III/2 of Sections A-III/1 and A-III/2 of the STCW Code mentioned above.

Examination and Assessment of Competence

SHORTCOMING 5

Therefore, the Philippines' authorities do not fully ensure that the system in place for conducting the practical assessment of competence of seafarers is structured and include the methods, means of delivery and procedures as necessary to provide the demonstration of competence and the criteria to evaluate the competence required under the STCW Code for the competences concerned and provides assurance that the candidates for certification have achieved the prescribed standards of competence, as required by the STCW Code.

The EMSA inspectors identified inconsistencies concerning the activities for practical assessment for certification.

Grievance 13

Inconsistencies in practical assessment conducted by ACs

All the 3 visited ACs conducted the practical assessment generally following the 'competence mapping'. The practical assessment is mostly based on simulator exercises, called 'practical scenarios', which were designed by the ACs and approved by MARINA's Boards of Examiners. In addition, there were several competences which required laboratory demonstrations by the candidates, while some other competences were assessed through an oral question and answer procedure, although the latter were categorised as "practical assessment".

In 2019, MARINA amended, through its STCW Circulars 2018-09 and 2019-08, some elements of the practical assessment system, which was called the 'new system' and started to be implemented by ACs in the second half of 2019.

This new system required the authorised ACs to develop six simulator practical scenarios per function for each CoC level (operational and management) and department (deck and engine).

In addition, the ACs are required to give candidates one day to familiarise themselves with the AC's simulators.

The practical assessment sessions are required to be held on the following day and to cover all functions at the level of the CoC concerned. Under the old system, the practical assessment for deck officers at management level required the conduct of practical scenarios over two consecutive days, while the new system requires the practical assessment for such officers to be completed in one day.

The three visited ACs had been accredited for the new system and their practical scenarios had been approved by the Boards of Examiners, although they were still conducting practical assessment under the old system. The monitoring conducted by MARINA is therefore not effective and breaches the obligations required by Regulation I/6.1 of the STCW Convention.

These ACs implemented a QMS designed to cover all the activities concerning the practical assessment of candidates for CoCs.

However, the following findings were identified:

- Table A-II/1 of the STCW Code specifies the following competences: “Plan and conduct a passage and determine position”, “Maintain a safe navigational watch”, “Use of Radar and ARPA”, “Use of ECDIS”, “Respond to emergencies”, “Respond to a distress signal at sea” and “Manoeuvre the ship”. Table A-II/2 of the STCW Code specifies the following competences: “Plan a voyage and conduct navigation”, “Determine position and the accuracy of resultant position fix by any means”, “Determine and allow for compass errors”, “Coordinate search and rescue operations”, “Maintain safe navigation through the use of information from navigation equipment and systems to assist command decisions”, “Maintain safe navigation through the use of ECDIS and associated navigation systems to assist command decision making”, “Respond to navigational emergencies” and “Manoeuvre and handle a ship in all conditions”.

The simulator exercises developed for the practical scenarios that addressed the above-mentioned competences specified under Tables A-II/1 and A-II/2 of Sections A-II/1 and A-II/2 of the STCW Code designed by Protect Marine Deck and Engine Officers of the Philippines and by Integrated Maritime Practical Assessment Center & Technical Solutions, which had been approved by the Board of Examiners, do not cover the ‘assessment outcomes’ defined in the specifications of the corresponding practical scenario. These assessment outcomes are associated with KUPs and criteria to evaluate competence specified in the tables of competence for the above-mentioned competences.

The assessment outcomes that are not covered are 'approve a voyage plan using Mercator sailing', 'approve the reporting requirements of ISM, JASREP and AMVER', 'appraise the accuracy of terrestrial observations', 'appraise the accuracy of the position obtained from modern electronic navigational aids', 'apply the procedures contained in the IAMSAR manual', 'precautions to be done when beaching a ship', 'action if grounding is imminent and after grounding', 'actions in refloating a grounded ship with and without assistance', 'take action if collision is imminent', 'use emergency steering', 'towing arrangements and towing procedures', 'manoeuvre the ship in shallow water, including the reduction in under-keel clearance caused by squat, rolling and pitching', 'handle the vessel safely in rivers, estuaries and restricted waters, having regard to the effects of current, wind and restricted water on helm response', 'demonstrate anchoring the vessel', 'practical measures to be taken when navigating in or near ice or in conditions of ice accumulation on board', 'importance of negating at reduced speed to avoid damage caused by own ship's bow wave and stern wave'.

- Section A-I/12.8.4 of the STCW Code requires assessors, where simulators are used to assess the ability of candidates to demonstrate levels of competency, to ensure that the assessment of performance takes into account normal operating procedures and any behavioural interaction with other candidates on the simulator or with simulator staff. Protect Marine Deck and Engine Officers of the Philippines and by Integrated Maritime Practical Assessment Center & Technical Solutions designed several scenarios for the competences specified under Tables A-II/1 and A- II/2 of Sections A-II/1 and A-II/2 of the STCW Code for the functions 'Navigation at the operational level' and 'Navigation at the management level'.

However, these scenarios respectively reproduced only unusual situations (i.e., a fire on board the own ship and a collision situation with other ship, for the assessment outcome related to 'maintain a safe navigational watch'), are not relevant to the assessment outcomes and are not in line with the requirement of "an assessment of performance (taking into account) normal operating shipboard procedures" as prescribed in the Section A-I/12.8.4 of the STCW Code.

- Table A-II/1 of Section A-II/1 of the STCW Code requires candidates to achieve the competence “Plan and conduct a passage and determine position” and Table A-II/2 of Section A-II/2 of the STCW Code requires candidates to achieve the competence “Plan a voyage and conduct navigation”.

The tasks described in the simulator scenario specifications to achieve the above-mentioned competences are not consistent with the actual required performance imposed on the candidates and some of the tasks are not performed at all.

This was identified in all the simulator scenarios examined at the Protect Marine Deck and Engine Officers of the Philippines and at the Integrated Maritime Practical Assessment Center & Technical Solutions. For example, the simulator scenario “Port-au Prince to Gibraltar” defined by Protect Marine Deck and Engine Officers of the Philippines only required the candidates to complete two tasks, namely to introduce way points and to verify the navigation courses along the route for consistency with only one criterion, although the defined assessment outcome involved planning of a complete passage between those ports.

In addition, the set of six approved scenarios designed for the practical assessment of deck officers and masters designed by Protect Marine Deck and Engine Officers of the Philippines are very similar with each other in terms of tasks and assessment outcomes.

This was identified in scenarios approved by the Board of Deck Officers at both operational and management level; for example, one scenario was “Port-au Prince to Gibraltar” and another was “Gibraltar to Port-au-Prince” and they only covered half of the defined assessment outcomes.

- Section A-I/12.8.1 of the STCW Code requires that where simulators are used to assess the ability of candidates to demonstrate levels of competency, assessors shall ensure that performance criteria are identified clearly and explicitly and are valid and available to the candidates.

However, the assessment tasks and outcomes defined in the simulator scenarios prepared by Protect Marine Deck and Engine Officers of the Philippines and by Integrated Maritime Practical Assessment Center & Technical Solutions do not specify the performance and assessment criteria, as required by Section A-I/12.8.1 of the STCW Code.

- Table A-II/1 requires for demonstrating the competence “Respond to emergencies” the following methods: ‘Examination and assessment of evidence obtained from one or more of the following:

- .1 approved in-service experience
- .2 approved training ship experience
- .3 approved simulator training, where appropriate
- .4 practical training’ and for its evaluation the following criteria:

‘The type and scale of the emergency is promptly identified. Initial actions and, if appropriate, maneuvering of the ship are in accordance with contingency plans and are appropriate to the urgency of the situation and nature of the emergency’.

Table A-II/1 requires for demonstrating the competence “Respond to a distress signal at sea” the following methods: ‘Examination and assessment of evidence obtained from practical instruction or approved simulator training, where appropriate’ and for its evaluation the following criteria ‘The distress or emergency signal is immediately recognized. Contingency plans and instructions in standing orders are implemented and complied with’.

Table A-II/1 requires for demonstrating the competence “Maneuver the ship” the following methods: ‘Examination and assessment of evidence obtained from one or more of the following:

- .1 approved in-service experience
- .2 approved training ship experience
- .3 approved simulator training, where appropriate
- .4 approved training on a manned scale ship model, where appropriate’ and for its evaluation the following criteria: ‘Safe operating limits of ship propulsion, steering and power systems are not exceeded in normal maneuvers. Adjustments made to the ship’s course and speed to maintain safety of navigation’.

In addition, the competence mapping specifies the use of certain facilities and equipment for assessing these specific competences.

However, in assessments carried out by Protect Marine Deck and Engine Officers of the Philippines for the above competences and procedures, the instructor made available a mock-up ship emergency manual, contingency plan or other simulated ship document (i.e., a safety management system procedure) to the candidate. Then the instructor questioned the candidate about the procedure to be taken in case of the situation concerned.

However, the candidate only had to find the section concerned with the situation or procedure in the document made available and read out loud the list of actions stated therein. Protect Marine Deck and Engine Officers of the Philippines apply this oral question-and-answer method for those competences. Using such method and criteria is not consistent with the above-mentioned methods and criteria specified in Table A-II/1 of Section A-II/1 of the STCW Code and, therefore, does not ensure that the candidate demonstrated having met the competences concerned.

- Table A-III/2 of Section A-III/2 of the STCW Code for the competence “Detect and identify the cause of machinery malfunctions and correct faults” provides the following KUPs:

1) Detection of machinery malfunction, location of faults and action to prevent damage,

2) Inspection and adjustment of equipment,

3) Non-destructive examination.’
Table A-III/2 also requires for demonstrating this competence the following methods ‘Examination and assessment of evidence obtained from one or more of the following:

.1 approved in-service experience

.2 approved training ship experience

.3 approved simulator training, where appropriate

.4 approved laboratory equipment training’.

Table A-III/2 requires for the evaluation of this competence the following criteria: 'The methods of comparing actual operating conditions are in accordance with recommended practices and procedures. Actions and decisions are in accordance with recommended operating specifications and limitations. Integrated Maritime Practical Assessment Center & Technical Solutions designed some scenarios for assessing candidates for engineer officer CoCs, which were approved by the Board of Marine Engineer Officers. The curriculum mapping requires the use of either a simulator and a laboratory, or a laboratory only for the assessment of the above competence. When it requires both facilities, the scenario only specifies the use of an engine-room simulator. This AC had an engine-room simulator. However, a mechanical laboratory and a mechanical workshop were not available at this AC. The use of simulator training is appropriate for addressing the KUP 'Detection of machinery malfunction, location of faults and action to prevent damage' although not completely.

However, the use of simulator training for addressing the other two KUPs mentioned in the text is not 'appropriate' because a simulator does neither include the technical elements nor support the relevant procedures to enable and provide training on 'inspection and adjustment of equipment', and 'non-destructive examination'.

These two KUPs require laboratory equipment training. Therefore, the use of a simulator as a single method for demonstrating this competence is not in accordance with the methods specified in Table A-III/2 for that competence.

PHILIPPINE MEASURES

Immediate Measures

- 1.** The MARINA has reviewed and revised the competences and KUPs required to be assessed, both theoretical examination and practical assessment (using simulator and/or laboratory equipment or other means of assessment) as indicated in Competency Mapping which took into consideration the methods for demonstrating competence as required in Column 3 of the relevant Table of Competence of the STCW Code. Reference to Grievance 12, the following were the results of the review and revision conducted by the Board of Examiners (BOE):
- Table A-III/1 of Section A-III/1 of the STCW Code under the competence “Operate main and auxiliary machinery and associated control systems” which requires KUP on ‘basic construction and operation principles of machinery systems, including:
 - 1) marine diesel engines;
 - 2) marine steam turbines;
 - 3) marine gas turbines;
 - 4) marine boilers;
 - 5) shafting installations, including propellers;
 - 6) other auxiliaries, including various pumps, air compressor, purifier, fresh water generator, heat exchanger, refrigeration, air-conditioning and ventilation systems;
 - 7) steering gear;
 - 8) automatic control systems;
 - 9) fluid flow and characteristics of lubricating oil, fuel oil and cooling systems;
 - 10) deck machinery

- *The BOE has identified that this can be demonstrated by successfully passing the MARINA prescribed theoretical examination. As such, no changes have been made with the Competency Mapping. (Annex IV of MARINA Advisory No. 2020-87, Page 6)*

PHILIPPINE MEASURES

Immediate Measures

- Table A-III/1 of Section A-III/1 of the STCW Code under the competence “Operate electrical, electronic and control systems” which requires KUP on ‘basic configuration and operation principles of the following electrical, electronic and control equipment:
 - 1) electrical equipment: 1c) electrical motors including starting methodologies;
 - *At the time of EMSA inspection, this KUP is required to be demonstrated through theoretical examination and practical assessment by using simulator **or** laboratory equipment. In the revised competency mapping, the BOE has identified that this KUP shall be assessed by theoretical examination and practical assessment using simulator **and** laboratory equipment. (Annex IV of MARINA Advisory No. 2020-87, Page 10)*
 - 1d) high voltage installations;
 - *The BOE has identified that this shall be assessed through practical assessment by using either simulator or laboratory equipment. (Annex IV of MARINA Advisory No. 2020-87, Page 11)*
 - 1e) sequential control systems and associated system devices;
 - 2) electronic equipment:
 - 2a) characteristics of basic electronic circuit elements;
 - 2b) flowchart for automatic and control system;
 - 2c) functions, characteristics and features of control systems for machinery items, including main propulsion plant operation control and steam boiler automatic controls;
 - 3) control systems:
 - 3b) proportional-integral-derivative (PID) control characteristics and associated system devices for process control
 - *The BOE has identified that these shall be assessed through theoretical examination and practical assessment by using a simulator. (Annex IV of MARINA Advisory No. 2020-87, Page 11-12)*

PHILIPPINE MEASURES

Immediate Measures

- Table A-III/2 of Section A-III/2 of the STCW Code under the competence “Manage the operation of propulsion plant machinery” requires KUP on ‘design features, and operative mechanism of the following machinery and associated auxiliaries: 1. Marine diesel engine; 2. Marine steam turbine; 3. Marine gas turbine; 4. Marine steam boiler’.

- *The BOE has identified that this can be demonstrated by successfully passing the MARINA-prescribed theoretical examination. (Annex III of MARINA Advisory No. 2020-87, Page 2)*

- Table A-III/2 of Section A-III/2 of the STCW Code under the competence “Manage operation of electrical and electronic control equipment” requires the KUPs on ‘design features and system configurations of automatic control equipment and safety devices for the following: 1) Main engine; 2. Generator and distribution system; 3. Steam boiler’.

- *The BOE has identified that these shall be assessed through theoretical examination and practical assessment by using a simulator. (Annex III of MARINA Advisory No. 2020-87, Page 9)*

Given the above, MARINA issued on 03 December 2020 Advisory No. 2020-87 ([Attachment 46](#)) which contains the revised Competency Mapping for the following levels of responsibility:

- 1) Deck Management Level;
- 2) Deck Operational Level;
- 3) Engine Management Level;
- 4) Engine Operational Level;
- 5) GMDSS Radio Operator; and
- 6) Electro-Technical Officers.

In addition, all existing Assessment Centers (ACs), including those who intend to apply, were directed to use the same in the creation of practical assessment scenarios which shall be subjected to the validation of the Board of Examiners as part of the approval process.

PHILIPPINE MEASURES

Immediate Measures

2. To ensure uniform validation of practical assessment scenarios, MARINA has established and approved on 15 February 2021 the Criteria for Evaluating Practical Assessment Scenarios with corresponding definitions and indicators ([Attachment 47](#)). The criteria include the use of laboratory equipment or simulator in the assessment, including its specification, operational capabilities, and limitations, if any. Further, this document serves as a guide for Assessment Centers (during self-assessment phase) and MARINA's Board of Examiners (during documentary review and inspection) in evaluating the scenarios to ensure completeness and alignment with the Competency Mapping.

In compliance with Section 5 of STCW Circular Nos. 2018-08 and 2018-09, the Administration implements Theoretical Examination (computer-aided test) and Practical Assessment (with the aid of laboratory equipment or simulator). To ensure the effective implementation of the practical assessment, one of the criteria to be evaluated by the Board of Examiners is the appropriateness of the laboratory equipment or simulator including its specification, operational capabilities, and limitations, if any. If using a simulator, the BOE ensures that it satisfies the General Performance Standards for Simulators used in Assessment of Competence in section A-1/12-part 1 paragraph 2.

Other criteria to be evaluated by the BOE are the Practical Assessment Scenario Title to ensure its relevance to the competence and KUP to be assessed; and Scenario Description which refers to the detailed situation, event or incident that occurs onboard ship, which is used as means to allow the candidate to demonstrate his/her competence on the task based on established performance criteria and standards.

The BOE ensures that the scenario description simulates actual situations normally encountered onboard ship such as environmental conditions, climatic conditions, operational challenges appropriate to the assessment outcome, including the time and sequence of events, and geographical location or sea area.

The use of realistic scenarios in the design and implementation of the assessment ensures that the actual tasks to be performed by the candidates are aligned with the outcome and criteria of the assessment exercise being performed.

PHILIPPINE MEASURES

Immediate Measures

Given the above and in reference to Bullet 2 of Grievance 13, the BOE could ensure that the approved scenarios under Table A-II/1 and A-II/2 of Sections A-II/1 and A-II/2 of the STCW Code for the functions 'Navigation at the Operational Level' and 'Navigation at the management level' are relevant to the assessment outcomes and are in line with the requirement of "an assessment of performance (taking into account) normal shipboard procedures" as prescribed in the Section A-I/12.8.4 of the STCW Code.

Likewise, the BOE could ensure that the tasks described in the simulator scenario specifications achieves the requirement of competence "Plan and conduct and passage and determine position" under Table A-II/1 of Section A-II/1 and competence "Plan a voyage and conduct navigation" under Table A-II/2 of Section A-II/2 as mentioned in Bullet 3 of the same Grievance are now consistent with the actual required performance imposed on the candidates and that all tasks are performed.

In addition, the assessment scenarios for the practical assessment of deck officers and masters are now different from one another in terms of tasks and assessment outcomes.

Additionally, as part of the documentary review and inspection, the Board of Examiners can thoroughly review and evaluate the performance and assessment criteria of every practical assessment scenario.

This ensures that all practical assessment scenarios approved by the Administration have appropriate performance and assessment criteria ensuring that the relevant assessment outcomes are measurable and amenable for evaluation.

Moreover, the BOE could ensure that all assessment outcomes defined in the specifications of the corresponding assessment scenarios are covered.

As such, the inconsistencies stated under Grievance 13 Bullet 1, 2, 3 and 4 were addressed with the use of the approved Criteria for Evaluating Practical Assessment Scenarios ([Attachment 47](#)), evaluated through the use of "Form AD-41: Practical Assessment Scenario Validation Form" ([Attachment 48](#)), which serves as a basis for the formulation of practical assessment scenarios which will be discussed in the succeeding actions taken.

PHILIPPINE MEASURES

Immediate Measures

3. All scenarios being used in the conduct of practical assessment by Assessment Centers were reviewed and approved by the BOE in accordance with MARINA Advisory No. 2020-87. MARINA Advisory No. 2021-50 was also issued providing guidelines on the conduct of practical assessment and submission of reports to Administration ([Attachment 49](#)).

To effectively implement the practical assessment by the Assessment Centers, the MARINA rolled out standardized practical assessment scenarios for Deck and Engine Operational and Management Level for the use of all ACS as reference in the design of their own assessment scenarios. Thereafter, ACs were visited by the MARINA Inspection Team, composed of the BOE and the personnel from the Accreditation Division, to verify the compliance with the prescribed requirements under MARINA Advisory No. 2020-87 using the Practical Assessment Scenario Validation Form. The approval process was conducted by the MARINA from March 2021 until June 2021.

Specific to **Grievance 11**, MARINA has required the use of appropriate laboratory equipment in the conduct of assessment as provided in the Annexes (Competency Mapping) of MARINA Advisory No. 2020-87 and to ensure that the required equipment for the conduct practical assessment is approved and monitored.

With reference to **Grievance 13 Bullet 5**, the candidates are now required to demonstrate the following identified competences under Table A-II/1 of the STCW Code:

- Respond to emergencies
- KUP “Emergency Procedures –
.1 Precautions for the protections and safety of passengers in emergency situations”
 - *This is required to be demonstrated by the candidate by successfully passing the MARINA prescribed theoretical examination under competence ‘Respond to Emergencies’.*
- KUP “Emergency procedures –
.2 Initial action to be taken following a collision or a grounding; initial damage assessment and control;

PHILIPPINE MEASURES

Immediate Measures

- .3 Appreciation of the procedures to be followed for rescuing persons from the sea, assisting a ship in distress, responding to emergencies which arise in port”
 - *These KUPs are required to be demonstrated by the candidate through theoretical examination and practical assessment using a full mission simulator and mini-bridge.*
- Respond to a distress signal at sea
 - “KUP Search and rescue Knowledge of the contents of the International Aeronautical and Maritime Search and Rescue (IAMSAR) Manual”
 - *This KUP is required to be demonstrated by the candidate by successfully passing the MARINA prescribed theoretical examination and practical assessment for Radiocommunication at the Operational Level under competence ‘Transmit and receive information using GMDSS subsystems and equipment and fulfilling the functional requirements of GMDSS’ KUP ‘search and rescue radiocommunications, including procedures in the International Aeronautical and Maritime Search and Rescue (IAMSAR) Manual’*
- Maneuver the ship
 - *This competence is required to be demonstrated by the candidate through theoretical examination and practical assessment using a full mission simulator and mini-bridge.*

On the other hand, in reference to **Grievance 13 Bullet 6**, all KUPs under competence “Detect and identify the cause of machinery malfunctions and correct faults” under Table A-III/2 of Section A-III/2 of the STCW Code is now required to be demonstrated with the use of simulator and laboratory equipment.

The practical assessment scenarios that are compliant with the revised Competency Mapping and all established Criteria were fully implemented beginning 01 July 2021 pursuant to MARINA Memorandum Circular No. SC-2020-03 ([Attachment 50](#)).

PHILIPPINE MEASURES

Immediate Measures

4. A more stringent monitoring of Assessment Centers was reinforced. MARINA Advisory No. 2021-50 provides for the unannounced/random on-site monitoring at ACs by the BOE ([Attachment 49](#)).

Beginning September 2021, the BOE has been visiting, randomly and unannounced, the conduct of practical assessment at the ACs. ([Attachment 51](#) and [Attachment 52](#))

As part of the regular visits to ACs, the BOE verifies the practical assessments to ensure that it is properly conducted as enumerated in the “Form BOE-044: Unannounced/Random Visit Checklist of the Conduct of Practical Assessment” ([Attachment 53](#)) taking into consideration the following key areas: the assessment delivery, facilities, simulator, and equipment.

Specifically, the BOE checks whether the assessment is being conducted by a qualified and full-time MARINA accredited assessor/s and whether the conduct of practical assessment is in accordance with the QSS manual. Additionally, the Board of Examiners check whether the Full Mission Bridge Simulator/Engine Simulator and mini-bridges workstations, including all equipment for the conduct of practical assessment, are properly working.

PHILIPPINE MEASURES

Immediate Measures

- 5.** In the letters of MARINA dated 20 January 2022 ([Attachment 54](#) - Letter to Protect Marine and Engine Officers of the Philippines, Inc. (PROTECT) and [Attachment 55](#) - Letter to Integrated Maritime Practical Assessment Center & Technical Solutions (IMPACTS)), the ACs were duly notified of the EC findings and were required to submit corrections and corrective actions to rectify the specific findings by 24 January 2022 taking into consideration the requirements under the STCW Circular Nos. 2018-08 and 2018-09, as amended by the MARINA Memorandum Circular No. SC-2020-03. Moreover, the concerned ACs were required to submit measures to preclude the recurrence of the said findings and to mainstream the said mitigating measures in its Quality Standard System (QSS).

PROTECT responded to the letter providing corrections and corrective actions including the corresponding factual evidence. Based on the evaluation of the Administration, it can be concluded that the Grievances have been addressed. ([Attachment 56](#) and [Attachment 56-A](#))

Also, IMPACTS responded to the letter providing corrections and corrective actions including the corresponding factual evidence. Based on the evaluation of the Administration, it can be concluded that the Grievances have been addressed. (Attachment 57 and Attachment 57-A)

PHILIPPINE MEASURES

Immediate Measures

6. To ensure the continuing effectiveness of the practical assessment, which is required prior to the issuance of Certificate of Competency, MARINA will conduct an annual review, or as the need arises, of the following:
 - a. Competency Mapping pursuant to the revised QPR 8.4.2;
 - b. Standard Scenario template;
 - c. Circular or advisory relevant to the conduct of practical assessment; and
 - d. QSS procedure.
7. MARINA will issue Memorandum Circular which provides policies, rules, and regulations for the approval of the conduct of the practical assessment revising the STCW Circular No. 2015-10. Specifically, Article 10 of the Memorandum Circular, Conduct of Practical Assessment, Section 19, provides, "In the conduct of practical assessment, ACs shall apply appropriate methods, laboratory equipment, simulators and other means of assessment to determine the ability of the candidate to perform the required task of a particular level of responsibility."

To ensure the uniformity in the design and conduct of practical assessment being administered by all Assessment Centers, the MARINA shall be issuing guidance materials including standardized assessment scenarios.

Based on the Timeline of Implementation ([Attachment 58](#)) which was approved on 25 January 2022, the enhanced practical assessment scenarios will be fully implemented in September 2022. Likewise, the Competency Mapping will be subjected to periodic review to ensure its continuing responsiveness with the provisions of the STCW Convention and the Code.

This Circular prescribes policies, rules and regulations on the grant of authority for Assessment Centers (ACs) to conduct practical assessment for the Administration in compliance with the relevant provisions for the issuance of the relevant STCW Certificates under Chapters II, III and IV of the STCW Convention, 1978, as amended, and implements the applicable provisions of Regulation I/6 "Training and Assessment", Regulation I/8 "Quality Standards" and Regulation I/12 "Use of Simulators" of the STCW Convention, 1978, as amended, on the assessment of competence of seafarers.

PHILIPPINE MEASURES

Immediate Measures

To ensure standard implementation of the requirements established by the Maritime Administration, all Assessment Centers applying for approval to conduct practical assessment are required to establish a Quality Standard System (QSS) in the conduct of Practical Assessment. Assessment Centers are also required to undertake all assessment processes and procedures strictly in accordance with their QSS.

Further, Assessment Centers are required to submit validated and pilot-tested practical assessment scenarios in accordance with the requirements under the Regulation I/12 Section A-I/12 paragraph 8 of the STCW Convention.

This shall be supported by the accomplished Practical Assessment Scenario Validation Form which is drawn from the Criteria for Evaluating Practical Assessment Scenario. The pilot testing of scenarios prior to submission to the Administration shall involve AC-identified participants appropriate to the Level of Responsibility.

Upon submission, the Circular requires the conduct of validation through documentary review of the MARINA Board of Examiners to ensure that the practical assessment scenarios developed by the applying Assessment Center are aligned with the Competency Mapping and the Criteria for Evaluating Practical Assessment Scenarios prior to proceeding with the inspection. All scenarios that are not compliant with the aforementioned requirements shall be returned to the respective Assessment Center with Notice of Deficiency.

Once found compliant during the documentary review, the Circular requires that an inspection at the Assessment Center shall be conducted during which at least one (1) set of scenarios shall be validated. The Board of Examiners monitors and logs the observations and findings in the Practical Assessment Scenario Validation Form for the conduct of test run.

This Memorandum Circular is scheduled to be presented to the MARINA Board on 09 March 2022 and shall take into force 15 days upon approval and publication.

PHILIPPINE MEASURES

Immediate Measures

8. The IMO, under its Integrated Technical Cooperation Program (ITCP), conducted a National Virtual Course on Assessment and Examination of Seafarers from September to October 2021 to key personnel and officials MARINA, CHED, and other relevant maritime institutions ([Attachment 13](#)).

As a result of the workshop, a course package was designed for purposes of cascading what the participants learned during the IMO workshop to their own institutions and subsequently to all maritime assessors of the ACs, MHEIs, and MTIs in coordination with the MARINA Training Institute (MARTI). In addition, it also aims to serve as the orientation materials for the ACs to be conducted by the BOE.

PHILIPPINE MEASURES

Factual Evidence

Attachment 46	MARINA Advisory No. 2020-87 including its Annexes (Revised Competency Mapping)
Attachment 47	Approved Criteria for Evaluating Practical Assessment Scenarios
Attachment 48	Form AD-41: Practical Assessment Scenario Validation Form
Attachment 49	MARNA Advisory No. 2021-50
Attachment 50	MARINA Memorandum Circular No. SC-2020-03 (full implementation of the new practical assessment)
Attachment 51	Results of Unannounced/Random Visit Conducted by the BOE at AC (Greatseas Mariners Training and Assessment Center)
Attachment 52	Results of Unannounced/Random Visit Conducted by the BOE at AC (Sea Quest Maritime Training, Inc.)
Attachment 53	Form BOE-044: Unannounced/Random Visit Checklist of the Conduct of Practical Assessment
Attachment 54	Letter-Notification to Protect Marine and Engine Officers of the Philippines, Inc. of the EC findings with directive to submit corrective action
Attachment 55	Letter-Notification to Integrated Maritime Practical Assessment Center & Technical Solutions (IMPACTS) of the EC findings with directive to submit corrective action
Attachment 56	Detailed Evaluation of PROTECT's Compliance Documents re ECAR
Attachment 56-A	PROTECT - Factual Evidence for Grievance 13 (Rectified Practical Assessment Scenarios)
Attachment 57	Detailed Evaluation of IMPACTS' Compliance Documents re ECAR
Attachment 57-A	IMPACTS submitted Factual Evidence for Grievance 13 (Rectified Practical Assessment Scenarios)
Attachment 58	Timeline of implementation of the enhanced practical assessment scenarios
Attachment 13	IMO Consultants' Report on National Training Course on Assessment and Examination of Seafarers (Phase 2)

KEY AREA FOUR

**AVAILABILITY AND USE
OF TRAINING FACILITIES
AND SIMULATORS**

Availability and Use of Training Facilities and Simulators

SHORTCOMING 6

Therefore, the Philippines' authorities do not ensure that the MHEIs and ACs fully ensure that the training and assessment are **structured** and included the **methods, means of delivery and material** to achieve the prescribed standards of competence, as required by the STCW Code, that the **simulator training was designed and tested** to confirm their suitability for the specified training objectives, and that **simulator assessment included valid and explicit performance and assessment criteria** to enable objective, uniform and reliable measurement and evaluation of the achievement of the competence standards, in line with the STCW Code.

KEY AREA 4

Grievance 14

The MHEIs and ACs do not fully ensure the availability of appropriate and maintained facilities, equipment and simulators suitable for training and assessment

- Table A-II/1 of Section A-II/1 of the STCW Code under the competence “Plan and conduct a passage and determine position” requires KUP on ‘Thorough knowledge of and ability to use nautical charts, and publications, such as sailing directions, tide tables, notices to mariners, radio navigational warnings and ships’ routing information’. As method for demonstrating the competence Table A-II/1 requires ‘Examination and assessment of evidence obtained from one or more of the following:

- .1 approved in-service experience
- .2 approved training ship experience
- .3 approved simulator training, where appropriate
- .4 approved laboratory equipment training. Using chart catalogues, charts, nautical publications, radio navigational warnings, sextant, azimuth mirror, electronic navigation equipment, echo-sounding equipment, compass’.

In this spirit, Annex C of JCMCMC No. 01, series 2019, and annex C.1 of JCMCMC No.2 series of 2019 require MHEIs to make available at the chart plotting room (i.e., navigation laboratory) a minimum of 80 nautical charts of different scales and types.

However, the PNTC Colleges only have nine paper charts in the navigation laboratory and all are from a different area, which prevents the students working on the same exercise. Hence, it does not ensure that the competence “Plan and conduct a passage and determine position” is achieved, as required by Table A-II/1 of Section A-II/1 of the STCW Code.

- In line with the requirements of Section A-I/6.1.1 of the Code, the Annex C.1 of JCMMC No.2 series of 2019 and in annex C of JCMMC No. 01, series 2019 provides the ratio of minimum requirement for simulator equipment to student, which is one simulator per three students.
- In line with the requirements of Section A-I/6.1.1 of the Code, the Annex C.1 of JCMMC No.2 series of 2019 and in annex C of JCMMC No. 01, series 2019 provides the ratio of minimum requirement for simulator equipment to student, which is one simulator per three students.

However, the BIT International College does not have available sufficient navigation simulators for all the students enrolled. In particular, it allows, for a given exercise, seven students in each of its three computers 'mini bridges'. These included three computer screens displaying an ECDIS image, a Radar image and the own ship's conning display at the same time, a keyboard and a mouse, which were appropriate for no more than three students depending on the exercise and relevant learning outcomes. Hence, the above arrangement of the BIT International College does not ensure that each student carries out the training time specified in the syllabi of the ARPA and ECDIS courses to achieve the relevant learning outcomes.

However, the PMI Colleges the bridge simulator and Radar ARPA and ECDIS simulator stations available are not sufficient to train all the students enrolled in the relevant courses, since the instructors' allocated groups of seven or eight students per station to conduct an exercise in the ARPA simulator and groups of five in the bridge and navigation 'mini bridge' simulators. Hence, this does not ensure that each student carries out sufficient training to achieve the relevant learning outcomes.

- Table A-III/1 of Section A-III/1 of the STCW Code requires to achieve the competences “Appropriate use of hand tools, machine tools and measuring instruments for fabrication and repair on board” and “Maintenance and repair of shipboard machinery and equipment”.
- Table A-III/1 of Section A-III/1 of the STCW Code for the competence “Maintenance and repair of shipboard machinery and equipment” requires KUP on ‘Maintenance and repair, such as dismantling, adjustment and reassembling of machinery and equipment’.

However, the Baliwag Maritime Academy does not have the relevant equipment in the technical workshop for training purposes, but only for displaying.

However, at the Cristal E-College the pieces of equipment available in the auxiliary machinery workshop do not allow training to be completed in dismantling, inspecting, repairing and reassembling tasks and hence the competence required by Table A-III/1 of the STCW Code is not achieved.

- Section A-I/12 of the STCW Code in its paragraph 1 requires, among others, that each Party shall ensure that any simulator used for mandatory simulator-based training shall: (2) be capable of simulating the operating capabilities of shipboard equipment concerned, to a level of physical realism appropriate to training objectives, and include the capabilities, limitations and possible errors of such equipment; (3) have sufficient behavioural realism to allow a trainee to acquire the skills appropriate to the training objectives.

Section A-I/12 of the STCW Code in its paragraph 2 requires that each Party shall ensure that any simulator used for the assessment of competence required under the Convention or for any demonstration of continued proficiency so required shall: (2) be capable of simulating the operational capabilities of the shipboard equipment concerned to a level of physical realism appropriate to the assessment objectives, and include the capabilities, limitations and possible errors of such equipment; (3) have sufficient behavioural realism to allow a candidate to exhibit the skills appropriate to the assessment objectives.

Section A-I/12 of the STCW Code in its paragraph 4 requires that Radar simulation equipment shall be capable of simulating the operational capabilities of navigational radar equipment which meets all applicable performance standards adopted by the Organization. Section A-I/12 of the STCW Code in its paragraph 4 requires that ARPA simulation equipment shall be capable of simulating the operational capabilities of ARPAs which meet all applicable performance standards adopted by the Organization.

However, at the Cristal E-College, the Radar and ECDIS monitors of the full mission bridge simulator and its eight mini-bridges available display a distorted image (the video card of the associated computer does not have the required capability to display a circular image with the correct diameter). Thus, the Radar image displayed is not circular and the scale of the electronic nautical chart (hereinafter - ENC)s are not presented correctly. Therefore, the requirements of Section A-I/12 of the STCW Code are not guaranteed.

- Table A-III/1 of Section A-III/1 of the STCW Code requires candidates to achieve the competences “Operate electrical, electronic and control systems” and “Maintenance and repair of shipboard machinery and equipment”.
- Table A-IV/2 of STCW Code requires candidates to achieve the competence “Transmit and receive information using GMDSS subsystems and equipment and fulfilling the functional requirements of GMDSS”.

However, the equipment available in the main and auxiliary machinery workshop at Cristal E- College does not fully ensure training in dismantling, inspecting, repairing and reassembling machinery equipment consistent with the standard specified in Table A-III/1 for achieving the above-mentioned competences. The automation laboratory does not have programmable logic controllers (PLC) or proportional-integrative-derivative controllers (hereinafter - PID) available for training and demonstration relevant to the corresponding standards of Table A-III/1 of Section A-III/1 of the STCW Code.

However, there is no dummy EPIRB and SART, in the GMDSS laboratory of PNTC Colleges, Cristal E-College and the University of Cebu. These are indispensable for demonstration purposes to achieve the above-mentioned competence. The necessity to have the knowledge of EPIRB and SART available is also reflected by SOLAS in Chapter 4 Regulations 8,9,10,11.

PHILIPPINE MEASURES

Immediate Measures

1. MARINA-CHED notified PNTC Colleges, BIT International College, PMI Colleges, Baliwag Maritime Academy, Cristal E-College, and University of Cebu ([Attachment 34](#)) of the specific findings noted in the ECAR. They were required to explain and give comments on the findings and to submit a corrective action plan to address the findings and prevent recurrence.

- **PNTC Colleges'** compliance documents were submitted on 28 January 2022 ([Attachment 34-H](#)). Based on the review of the submitted documents, it was noted that the MHEI had undertaken the following corrective measures:

Bullet 1:

- It purchased additional paper charts for the navigation laboratory. The additional 15 paper charts will be of the same specification (the same area)
- The MHEI provided the collection receipt of the paper charts.

The Administration will undertake a monitoring activity to verify the physical availability of the additional paper charts and to determine the appropriateness of the charts for their intended purpose and to meet the required course/learning outcomes.

Bullet 8:

- PNTC Colleges purchased dummy SART and EPIRB.
- Developed the practical exercise that already included tasks/activities for the correct usage of SART and EPIRB.
- Photo of simulator with EPIRB and SART

Based on the documents submitted by PNTC Colleges, the Administration concluded that this specific finding has been addressed.

KEY AREA 4

PHILIPPINE MEASURES

Immediate Measures

- **BIT International College's** compliance documents were submitted on 28 January 2022 ([Attachment 34-F](#)). Based on the review of the submitted documents, the MHEI had undertaken the following corrective measures:

Bullet 2:

In addition to the existing 1 main bridge and 2 mini bridges "TRANSAS", MHEI purchased an additional bridge simulator installed at BIT IC DAO with 1 main station and 3 mini-Bridges "POSEIDON" to address the problem of the lack of laboratory equipment.

However, in spite of the purchase of additional equipment, the Administration could not ascertain whether the MHEI has sufficiently addressed this specific finding because it failed to submit the following documents:

- Accomplished Carrying Capacity Forms;
- List of Enrolled Students (per year level);
Copies of practical/laboratory exercises (for Nav5 and Nav6, including the course syllabi);
- Inventory of laboratory facilities and equipment (for Nav5 and Nav6); and
- Photos of the setup of the laboratory facilities and equipment for Nav5 and Nav6.

Moreover, the purchase of the additional bridge simulator with 3 mini bridges cannot be verified since no proof (official receipt) has been submitted. Therefore, based on the factual evidence submitted, the evaluation team concludes that the specific finding has not been sufficiently addressed.

- **The PMI Colleges - Bohol** submitted compliance documents on 28 January 2022 ([Attachment 34-A](#)). Based on the review of the submitted documents, it was noted that the MHEI had undertaken the following corrective measure(s):

Bullet 3:

PMI Colleges-Bohol added 3 additional ECDIS stations and made a comprehensive student usage allocation and scheduling to meet the learning and scheduling requirements of students.

However, the MHEI did not submit proof of purchase of the 3 ECDIS simulators, as well as the student allocation and scheduling, enrollment, and carrying capacity Forms 1-4. In addition, the submitted utilization form covers only NAV 518 (ARPA/RADAR) and does not include NAV 618 for ECDIS.

PHILIPPINE MEASURES

Immediate Measures

It was also noted that there was no stated correction / corrective action regarding RADAR/ARPA simulator. The Carrying Capacity cannot also be verified due to the absence of the Official Enrollment Report vis-à-vis the Carrying Capacity forms 1-4.

Therefore, based on the factual evidence submitted, the evaluation team concluded that the specific finding had not been sufficiently addressed.

- **Baliwag Maritime Academy (BMA)** submitted compliance documents on 28 January 2022 ([Attachment 34-I](#)). Based on the review of the submitted documents, the MHEI had undertaken the following corrective measures:

Bullet 4:

BMA submitted Laboratory Utilization Record Books as follows: Machinery Room, Automation, Electro and Kongsberg. However, the information therein is not sufficient to establish that the equipment in the said laboratories had been utilized for the training or assessment of the students enrolled in the courses requiring the use of the said equipment.

Moreover, the BMA's utilization of the said equipment per the utilization record books is not backed up or supported by the practical or assessment tools used by the students during the laboratory activities.

Further, the BMA has not submitted factual evidence on one of the corrections stated particularly the attendance of the laboratory custodian to the training on the IMO Model Course No. 6.10.

Therefore, based on the factual evidence submitted, the evaluation team concludes that the specific finding had not been sufficiently addressed.

- **Cristal E-College (CEC)** submitted compliance documents in electronic form on 28 January 2022 ([Attachment 34-G](#)).

Bullets 5, 6, 7, and 8:

At the time of the evaluation, the electronic link containing the pieces of documentary evidence cannot be accessed. As such, there is no basis to evaluate the Cristal E-Colleges' compliance to this particular shortcoming. The pieces of documentary evidence shall be required and checked during the regular monitoring to be conducted on 07-12 March 2022.

PHILIPPINE MEASURES

Immediate Measures

- **University of Cebu - METC submitted** compliance documents on 28 January 2022 ([Attachment 34-B](#)). Based on the review of the submitted documents, the MHEI has undertaken the following corrective measures:

Bullet 8:

Inventory Report submitted by the UC-METC shows 2 units of dummy EPIRB and 2 units of dummy SART equipment purchased in 2016 and supported with pictures of the units. The UC-METC also submitted an Exercise Plan and Assessment Plan indicating that this equipment will be used in the delivery of the MarCom course.

The Administration through CHED informed the PNTC Colleges, BIT International College, PMI Colleges, Baliwag Maritime Academy, Cristal E-College, and University of Cebu of the results of the evaluation and that the compliance of the MHEIs will be verified in the regular monitoring which will be conducted from February to March 2022.

The shortcomings that will be raised in the joint monitoring activities will be processed in accordance with the existing rules and regulations. If found non-compliant and have failed to address the shortcomings noted within the prescribed period, a Show Cause Order will be issued in accordance with existing policies, rules, and regulations.

PHILIPPINE MEASURES

Immediate Measures

2. CHED-MARINA issued JCMMC No. 03, s. 2022 ([Attachment 03](#)), which contains the revised Guidelines on Joint CHED-MARINA monitoring of BSMT and BSMarE Programs. This provides an enhanced system to ensure that education programs are structured in accordance with the requirements of the STCW Convention and that appropriate mechanisms are in place for better supervision and monitoring of MHEIs.
3. The Joint TWG created by CHED and MARINA has comprehensively reviewed and revised Annex C - Course Specifications for BSMT and BSMarE of CMO No. 14, series of 2018 entitled “*Addendum to CMO 67 series of 2017 entitled revised Policies, Standards and Guidelines for the BSMT and BSMarE programs*” to address the missing KUPs noted in the ECAR and to ensure that all the KUPs under the STCW Code are sufficiently covered.

Relative to this CHED-MARINA prepared and approved the Annual Monitoring Program of MHEIs for CY 2022 ([Attachment 22](#)) prioritizing the 11 MHEIs visited by EMSA and those issued with phase-out order. Likewise, the Joint CHED-MARINA list of MHEIs to be monitored for Years 2022-2024 was also approved ([Attachment 45](#)).

All joint monitoring activities starting AY 2022-2023 will be conducted in accordance with the guidelines in JCMMC No. 03, S-2022 and will use the enhanced Outcomes Based Monitoring Instrument (OBMI) ([Attachment 03-E](#)). Analysis of monitoring results will be used as a basis in coming up with recommendations to solve any identified weakness in the system based on the identified gaps.

Based on the revised course specifications, the MHEIs were directed through Joint CHED-MARINA Advisory No. 02, series of 2022 to review and revise their detailed teaching syllabi in conformity with the revised course specifications to be submitted no later than 15 May 2022. The revised detailed syllabi submitted by MHEIs shall be evaluated and approved for implementation for Academic Year 2022-2023.

For the courses Seam 2 and Seam 6, MHEIs were also directed to acquire the stress calculating equipment/computer and appropriate software to calculate vessel stability and trim (applications) to address the Course Outcomes, and other required equipment for courses identified, cognizant of the policies and standards on carrying capacity. ([Attachment 20](#), [Attachment 20-A](#), [Attachment 20-B](#), [Attachment 20-C](#), [Attachment 21](#))

PHILIPPINE MEASURES

Immediate Measures

4. Article VIII, Section 23 of the JCMMC No. 01, series of 2022 ([Attachment 01](#)) now requires MHEIs to ensure that all required equipment are available to serve their purpose for the course delivery and assessment. Further, the said JCMMC has included a requirement under the MHEIs' quality standard system to cover the policy and procedure on the use and maintenance of equipment and facilities for education and training.
 5. Article V, Section 11.6.3 of the JCMMC No. 01, series of 2022 requires the Academic Support Personnel to retain records of usage of laboratory equipment and to establish a planned maintenance system under the QSS of the MHEI. Moreover, Article VII, Section 20 requires that "Records of practical exercises and assessment shall be retained for a period of at least three (3) years and should be incorporated in the quality standards system of the MHEI to include, among others, maintenance of records on the finished product or output from practical laboratory activities." In addition, Article XI, Section 42.3.16 provides "Policy and procedure on records keeping of the evidence/records that will demonstrate that the laboratory equipment/simulator practical exercises and assessments have been implemented."
 6. Section 42.2.14 Article XI of JCMMC No. 1 s. 2022 ([Attachment 01](#)) requires MHEIs to establish policy and procedure on the standard carrying capacity computation signed by the Head of Department and the Dean which will serve as the basis of their registrar on the maximum number of students to be enrolled using the carrying capacity forms and the provision on equipment to student ratio. This will ensure that students are given sufficient exposure to the equipment or simulators for training or assessment to ensure attainment of the required outcomes.
- Further, Section 27 Article VIII of the same JCMMC now requires MHEIs to submit to CHED-OPSD, copy furnished MARINA STCW Office, the duly accomplished and notarized carrying capacity forms (1 to 4) as reflected in Annex I of the JCMMC two months before the start of the academic year. Thereafter, no changes on the carrying capacity shall be allowed.

PHILIPPINE MEASURES

Way Forward

7. Other MHEIs will likewise be subjected to regular monitoring based on the approved Annual Monitoring Program ([Attachment 22](#)) for CY 2022 using the prescribed OBMI that was enhanced to include specific objective evidence to guide the evaluator in the conduct of monitoring.
8. CHED and MARINA will continue to conduct Capacity Building of their personnel on the conduct of evaluation and inspection, and monitoring, at least twice a year and as may be deemed necessary, to ensure shared understanding of the requirements and manner of implementation of policies and standards, as well as rules and regulations. ([Attachment 38](#), [Attachment 39](#), and [Attachment 40](#))

The shortcomings that will be raised in the joint monitoring activities will be processed in accordance with the existing rules and regulations. If found non-compliant and failed to address the shortcomings noted within the prescribed period, a Show Cause Order will be issued in accordance with existing policies, rules, and regulations.

In addition, the MARINA is currently coordinating with the IMO ([Attachment 41](#) and [Attachment 42](#)) for another round of training under the ITCP regarding the evaluation, inspection and monitoring of maritime education programs.

PHILIPPINE MEASURES

Factual Evidences

Attachment 34	CHED Memorandum from the Office of the Executive Director No. 78-2022
Attachment 34-H	PNTC Colleges Compliance Detailed Evaluation with MARINA and CHED Communication Letters
Attachment 34-F	BIT International College Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-A	PMI Colleges Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-I	BMA Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-G	Cristal E-College Compliance Detailed Evaluation with MARINA and CHED Communication Letters
Attachment 34-B	UC-METC Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 03	JCMMC No. 03, series of 2022
Attachment 22	Annual Monitoring Program for CY 2022
Attachment 45	Joint CHED-MARINA List of MHEIs to be Monitored for 2022-2024
Attachment 03-E	Annex E: Outcomes-Based Monitoring Instrument
Attachment 20	Joint CHED-MARINA Advisory No. 02 series of 2022
Attachment 20- A	Revised Course Syllabus for Celestial Navigation (NAV 4) under JCMA No. 02, s. 2022
Attachment 20-B	Revised Course Syllabus for Voyage Planning (NAV 7) under JCMA No. 02, s. 2022
Attachment 20-C	Revised Course Syllabus for Leadership and Teamwork (Mngt 1) under JCMA No. 02, s. 2022
Attachment 21	Timeline of Activities for the Revision of Detailed Teaching Syllabus pursuant to under JCMA No. 02, s. 2022 No. 02, s. 2022
Attachment 01	JCMMC No. 01 series of 2022
Attachment 38	Calibration Workshop on Conducting Audits and Report Writing dated 28 August 2021
Attachment 39	Post Activity Report of the Calibration Workshop dated 09 February 2022
Attachment 40	Timeline of Activities for the Capacity Building
Attachment 41	MARINA Letter to IMO regarding Request Further Assistance to the Philippines dated 02 February 2022
Attachment 42	IMO TCD Letter to MARINA dated 04 February 2022

- Section A-I/12 of the STCW Code in its paragraph 1 requires among others that each Party shall ensure that any simulator used for mandatory simulator-based training shall: (2) be capable of simulating the operating capabilities of shipboard equipment concerned, to a level of physical realism appropriate to training objectives, and include the capabilities, limitations and possible errors of such equipment.
- Section A-I/12 of the STCW Code in its paragraph 1 requires among others that each Party shall ensure that any simulator used for mandatory simulator-based training shall: (2) be capable of simulating the operating capabilities of shipboard equipment concerned, to a level of physical realism appropriate to training objectives, and include the capabilities, limitations and possible errors of such equipment.

However, the ‘full mission bridge’ simulator available at Protect Marine Deck and Engine Officers of the Philippines does not have a fixed VHF set at the bridge console. Therefore, an appropriate level of realism consistent with the assessment objectives and the performance standards for simulators, as required by Section A-I/12.1.2 of the STCW Code, is not provided.

However, the ‘mini-bridge’ simulators available at Protect Marine Deck and Engine Officers of the Philippines and at Integrated Maritime Practical Assessment Center & Technical Solutions are equipped with steering and a ship’s engine command that did not provide a sufficient level of realism required by the simulator performance standards established by the STCW Code. Therefore, an appropriate level of realism consistent with the assessment objectives and the performance standards for simulators, as required by Section A-I/12.1.2 of the STCW Code, is not provided.

Therefore, as evidenced by the above findings, the MHEIs and ACs do not fully ensure the availability of appropriate and maintained facilities, equipment and simulators suitable for training and assessment, as required by Sections A-I/6 and A-I/12 of the STCW Code

PHILIPPINE MEASURES

Immediate Measures

1. In the letters of MARINA dated 20 January 2022 ([Attachment 54](#) - Letter to Protect Marine and Engine Officers of the Philippines, Inc. and [Attachment 55](#) - Letter to Integrated Maritime Practical Assessment Center & Technical Solutions (IMPACTS)), the ACs were duly notified of the EC findings and were required to submit corrections and corrective actions to rectify the specific findings by 24 January 2022 taking into consideration the requirements under the STCW Circular Nos. 2018-08 and 2018-09, as amended by the MARINA Memorandum Circular No. SC-2020-03. Moreover, the concerned ACs were required to submit measures to preclude the recurrence of the said findings and to mainstream the said mitigating measures in its Quality Standard System (QSS).

- **Protect Marine Deck and Engine Officers of the Philippines, Inc.**

Bullet 9

In response to the letter, PROTECT submitted its corrective measures ([Attachment 56](#)) with documentary evidence showing the Purchase Order, Sales Invoice, Delivery Slip and Collection Receipt of the fixed VHF ([Attachment 56-B](#)) set as well as the actual photos ([Attachment 56-C](#)) and video ([Attachment 56-D](#)) of the equipment. The Evaluation and Inspection Team shall be deployed to verify compliance of the actual equipment delivered.

Bullet 10

In response to the letter, IMPACTS submitted its corrective measures ([Attachment 57](#)) with documentary evidence showing the contract with URA 727 Software Solutions on the fabrication of the Steering Wheel Console Unit Parts (Steering system touch panel, Rudder indicator panel, Engine RPM panel, Engine Throttle touch panel, VHF handset mount) which will be delivered by the end of March 2022 ([Attachment 57-B](#)). Once the MARINA has been notified of the physical availability of the equipment, the Evaluation and Inspection Team shall be deployed to verify compliance of the actual equipment delivered.

PHILIPPINE MEASURES

Immediate Measures

2. MARINA established and approved the Criteria for Evaluating Practical Assessment Scenarios ([Attachment 47](#)) on 15 February 2021. The criteria includes the use of laboratory equipment or simulator that will be used in the assessment, including its specification, operational capabilities and limitations, if any.

3. MARINA will issue Memorandum Circular No. which provides policies, rules, and regulations for the approval of the conduct of the practical assessment revising the STCW Circular No. 2015-10. Specifically, Article 10 of the Memorandum Circular, Conduct of Practical Assessment, Section 19, provides, “In the conduct of practical assessment, ACs shall apply appropriate methods, laboratory equipment, simulators and other means of assessment to determine the ability of the candidate to perform the required task of a particular level of responsibility.”

Further, Section 11 of the same Circular provides that ACs shall be subjected to regular monitoring by the Monitoring Division, random surveillance to be conducted by the Surveillance Division and/or unannounced/random visit by the Board of Examiners (BOE).

This Memorandum Circular is scheduled to be presented to the MARINA Board on 09 March 2022 and shall take into force 15 days upon approval and publication.

PHILIPPINE MEASURES

Factual Evidences

Attachment 54	Letter-Notification to Protect Marine and Engine Officers of the Philippines, Inc.
Attachment 55	Letter-Notification to Integrated Maritime Practical Assessment Center & Technical Solutions (IMPACTS)
Attachment 56	Detailed Evaluation of PROTECT's Compliance Documents re ECAR
Attachment 56-B	PROTECT - Purchase Order, Sales Invoice, Delivery Slip and Collection Receipt for 8 Units of VHF
Attachment 56-C	PROTECT - Photos of Installed VHF at Full Mission Bridge and Mini-Bridges
Attachment 56-D	PROTECT - Video of Installed VHF at Full Mission Bridge and Mini-Bridges (available via link)
Attachment 56-E	PROTECT - Sales Agreement for Desktop Console with Instrument including Annex
Attachment 57	Detailed Evaluation of IMPACTS' Compliance Documents re ECAR
Attachment 57- B	IMPACTS - Contract Order for the Fabrication and Assembly of Ship Simulator Steering and Engine Control Console
Attachment 47	Approved Criteria for Evaluating Practical Assessment Scenarios

Availability and Use of Training Facilities and Simulators

SHORTCOMING 6

Therefore, the Philippines' authorities do not ensure that the MHEIs and ACs fully ensure that the training and assessment are **structured** and included the **methods, means of delivery and material** to achieve the prescribed standards of competence, as required by the STCW Code, that the **simulator training was designed and tested** to confirm their suitability for the specified training objectives, and that **simulator assessment included valid and explicit performance and assessment criteria** to enable objective, uniform and reliable measurement and evaluation of the achievement of the competence standards, in line with the STCW Code.

Grievance 15

Design, testing, approval and practice of simulator exercises were not conducted as required

Section A-I/12.7.7 STCW requires that in conducting mandatory simulator training instructors shall ensure that simulator exercises are designed and tested so as to ensure their suitability for the specified training objectives. During the inspection, it was found that the **simulator exercises approved by the PMI Colleges for the ECDIS course were described insufficiently since the training objectives, scenario description and performance and assessment criteria were not specified. The PMI Colleges do not ensure the implementation of an appropriate simulator exercise design and approval procedure.**

Moreover, **the Baliwag Maritime Academy, the Philippine Merchant Marine School, the Our Lady of Fatima University and the PMI Colleges do not provide evidence, i.e., records, demonstrating that the simulator exercises are systematically tested to ensure their suitability for the specified training objectives,** as required by Section A-I/12.7.7 of the STCW Code.

This lack of records means that those MHEIs are unable to track the activities and, eventually, ensure compliance with the requirements of the STCW Code, particularly those concerning quality standards and suitability of the simulator exercises for the specified learning objectives.

Hence, these MHEIs do not comply with the requirements of the Section A-I/12.7.7 and therefore, they do not ensure that the simulator exercises are suitable for the specified learning objectives.

PHILIPPINE MEASURES

Immediate Measures

1. CHED-MARINA notified PMI Colleges, Baliwag Maritime Academy, Philippine Merchant Marine School, Our Lady of Fatima University ([Attachment 34](#)) of the specific findings noted in the ECAR. They were required to explain and give comments on the findings and to submit a corrective action plan to address the findings and prevent recurrence.
- **PMI Colleges - Bohol (PMI)** submitted compliance documents on 28 January 2022 ([Attachment 34-A](#)). Based on the review of the submitted documents, the MHEI provided the following:

The PMI presented 10 laboratory exercises and practical assessments. However, it could not be ascertained whether these were reviewed and validated. They did not provide the objective evidence on the revised simulator exercises and assessments which were claimed to have been reviewed and validated. Policy and procedures and Validation forms were also not submitted.

While the exercise documents submitted by the MHEI provide for exercise objectives, materials and equipment, they did not provide the scenario description and the performance and assessment criteria.

In the simulator evaluation for NAV 6, it was noted that there is no documentation on the pilot testing of scenarios, as required under Article VII, Section 15 of CMO No. 67, series of 2017.

Therefore, based on the factual evidence submitted, the evaluation team concludes that the specific finding has not been sufficiently addressed.

PHILIPPINE MEASURES

Immediate Measures

- **Baliwag Maritime Academy (BMA)** submitted compliance documents on 28 January 2022 ([Attachment 34-I](#)). Based on the review of the submitted documents, the MHEI provided a revised policy and procedure in the design and development of simulation exercises incorporating provisions for the mandatory pilot testing of the simulator exercise to ensure their suitability for the specified training objective. Therefore, based on the factual evidence submitted, the evaluation team concludes that the specific finding has been sufficiently addressed.
- **Philippine Merchant Marine School (PMMS)** submitted compliance documents on 27 January 2022 ([Attachment 34-J](#)). Based on the submitted documents, the PMMS has reviewed and revised all practical exercises and assessments using simulators by following the design and development procedures (i.e., Revised PM 02-19 – Developing Practical Exercises and Assessment Instruments) and their preparation to ensure that they are appropriately aligned to the competences, KUPs and learning outcomes stated in the course syllabi. Likewise, the PMMS reviewed and revised NAV 5 and NAV 6 that require simulated exercises and assessments in accordance with established procedures under PM 02-19 (Developing Practical Exercises and Assessment Instruments).

To ensure that the revised policy and procedure in the design and development of simulation exercises is implemented by BMA, the CHED-MARINA monitoring team shall require criteria and records pertinent to the validation of simulation exercises in the regular monitoring to be conducted on 18-19 March 2022.

In addition, PMMS submitted 10 laboratory exercises including pertinent records that said documents were reviewed and validated. Moreover, policy and procedure on review and validation of such including review and validation form were also submitted.

Therefore, based on the factual evidence submitted, the evaluation team concludes that the specific finding has been sufficiently addressed.

PHILIPPINE MEASURES

Immediate Measures

- **Our Lady of Fatima University (OLFU)** submitted compliance documents on 27 January 2022 ([Attachment 34-C](#)). Based on the review of the submitted documents, OLFU has no records of implementation of the Creation, Review, Validation, Revision, and Development of simulation exercises, as required under the MHEI's QSS.

Therefore, based on the evidence submitted by the MHEIs, it can be concluded that this specific grievance is not addressed.

2. CHED-MARINA prepared and approved the Annual Monitoring Program covering the 30 MHEIs for CY 2022 ([Attachment 22](#)) prioritizing the 11 MHEIs visited by EMSA and the 7 MHEIs with phase-out orders. Likewise, the Joint CHED-MARINA list of MHEIs to be monitored for Years 2022-2024 ([Attachment 45](#)) was also approved pursuant to the three-year cycle mentioned in the approved JCMMC No. 03 series of 2022.

3. CHED-MARINA issued the JCMMC No. 03 series of 2022 ([Attachment 03](#)) reflecting the policy of prioritization and the provision for the conduct of Focus Monitoring which will give emphasis on the outstanding deficiencies to ensure that those institutions delivered education and training programs in accordance with existing policies, standards and guidelines, and structured as necessary to achieve the prescribed standards of competence, as required by the STCW Code.

All joint monitoring activities starting AY 2022-2023 will be conducted in accordance with the guidelines in JCMMC No. 03, S-2022 and will use the enhanced Outcomes Based Monitoring Instrument (OBMI) ([Attachment 03-E](#)). Analysis of monitoring results will be used as a basis in coming up with recommendations to solve any identified weakness in the system based on the identified gaps.

The Administration through CHED informed the PMI Colleges, Baliwag Maritime Academy, Philippine Merchant Marine School, Our Lady of Fatima University of the results of the evaluation and that the compliance of the MHEIs will be verified in the regular monitoring which will be conducted from to March 2022. The shortcomings that will be raised in the joint monitoring activities will be processed in accordance with the existing rules and regulations. If found non-compliant and have failed to address the shortcomings noted within the prescribed period, a Show Cause Order will be issued in accordance with existing policies, rules, and regulations.

PHILIPPINE MEASURES

Immediate Measures

4. The Joint TWG created by CHED and MARINA has comprehensively reviewed and revised Annex C - Course Specifications for BSMT and BSMarE of CMO No. 14, series of 2018 entitled *“Addendum to CMO 67 series of 2017 entitled revised Policies, Standards and Guidelines for the BSMT and BSMarE programs”* to address the missing KUPs noted in the ECAR and to ensure that all the KUPs under the relevant table of the STCW Code are sufficiently covered.

Based on the revised course specifications, the MHEIs were directed through Joint CHED-MARINA Advisory No. 02, series of 2022 to review and revise their detailed teaching syllabi in conformity with the revised course specifications to be submitted no later than 15 May 2022. The revised detailed syllabi submitted by MHEIs shall be evaluated and approved for implementation for Academic Year 2022-2023.

For the courses Seam 2 and Seam 6, MHEIs were also directed to acquire the stress calculating equipment/computer and appropriate software to calculate vessel stability and trim (applications) to address the Course Outcomes, and other required equipment for courses identified, cognizant of the policies and standards on carrying capacity. ([Attachment 20](#), [Attachment 20-A](#), [Attachment 20-B](#), [Attachment 20-C](#), [Attachment 21](#))

5. CHED-MARINA issued JCMMC No. 01, series of 2022 ([Attachment 01](#)) wherein Article VI, Section 13 requires MHEIs to ensure the provision and availability of necessary facilities, equipment and other instructional support to ensure the attainment of the intended learning outcomes and the achievement of the prescribed standards of competence under the STCW Convention, 1978, as amended and other relevant international covenants. Moreover, the said JCMMC has included a requirement under the MHEIs' quality standard system to cover the policy and procedure on the use and maintenance of equipment and facilities for education and training.

PHILIPPINE MEASURES

Immediate Measures

6. CHED-MARINA has set the standard template containing the mandatory elements with corresponding descriptions for the design and development of practical exercises which is attached in the template of the detailed teaching syllabus ([Attachment 01-F](#)) annexed to the JCMC No. 01, series of 2022. The elements will ensure that the practical/simulator exercises developed by the MHEIs are sufficiently described and are appropriate and suitable to meet the prescribed learning outcome (training objective). This will also guide MHEIs in developing their own instruments/materials relative to the specific plan for practical exercises.

Way Forward

7. To assist MHEIs in their compliance to this standard, an orientation and workshop will be conducted by CHED and MARINA to enhance the skills of the Faculty and Instructors in preparing practical exercises by understanding the elements and appropriately filling out the standard template. ([Attachment 40](#)) It is intended that after the orientation workshop, the MHEIs will be able to appropriately develop/prepare the exercise plan for each practical exercise.

Attachment 34	CHED Memorandum from the Office of the Executive Director No. 78-2022
Attachment 34-A	PMI Colleges Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-I	BMA Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-J	PMMS Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-C	OLFU Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 22	Annual Monitoring Program for CY 2022
Attachment 45	Joint CHED-MARINA List of MHEIs to be Monitored for 2022-2024
Attachment 03	JCMC No. 03, series of 2022
Attachment 03-E	Annex E: Outcomes-Based Monitoring Instrument
Attachment 20	Joint CHED-MARINA Advisory No. 02 series of 2022
Attachment 20-A	Revised Course Syllabus for Celestial Navigation (NAV 4) under JCMA No. 02, s. 2022
Attachment 20-B	Revised Course Syllabus for Voyage Planning (NAV 7) under JCMA No. 02, s. 2022
Attachment 20-C	Revised Course Syllabus for Leadership and Teamwork (Mngt 1) under JCMA No. 02, s. 2022
Attachment 21	Timeline of Activities for the Revision of Detailed Teaching Syllabus pursuant to under JCMA No. 02, s. 2022 No. 02, s. 2022
Attachment 01	JCMC No. 01, series of 2022
Attachment 01-F	Annex F - Detailed Teaching Syllabus Template (Part D)
Attachment 40	Timeline of Activities for the Capacity Building

Table A-III/2 of Section A-III/2 of the STCW Code for evaluating the competence “Detect and identify the cause of machinery malfunctions and correct faults” requires the following criteria: ‘The methods of comparing actual operating conditions are in accordance with recommended practices and procedures. Actions and decisions are in accordance with recommended operating specifications and limitations.

However, candidates for an engineer officer CoC under assessment at Protect Marine Deck and Engine Officers of the Philippines are given access to the malfunctions that the instructors are able to introduce during an assessment exercise with the engine-room simulator.

Therefore, the candidates are not required to perform any analysis and diagnosis of the malfunction, which they could simply infer. This invalidated the reliability of any related criteria defined for assessing the candidates’ achievement of the above-mentioned competence specified in Table A-III/2 of Section A-III/2 of the STCW Code.

PHILIPPINE MEASURES

Immediate Measures

1. In the letter of MARINA dated 20 January 2022 ([Attachment 54](#) - Letter to Protect Marine and Engine Officers of the Philippines, Inc.), the AC was duly notified of the EC findings and was required to submit corrections and corrective actions to rectify the specific findings taking into consideration the requirements under the STCW Circular Nos. 2018-08 and 2018-09, as amended by the MARINA Memorandum Circular No. SC-2020-03. Moreover, the concerned AC was required to submit measures to preclude the recurrence of the said findings and to mainstream the said mitigating measures in its Quality Standard System (QSS).

In response to the letter, PROTECT submitted its corrective measures including its factual evidence. Based on the evaluation of the submitted documents, the Board of Examiners concluded that the Grievance has been addressed. ([Attachment 56](#), [Attachment 56-F](#))
2. The BOE has validated all practical assessment scenarios submitted by ACs using the approved Practical Assessment Scenario Validation Form ([Attachment 48](#)) as per the approved competency mapping required by the MARINA Advisory No. 2020-87. The validation process showed that all ACs are already compliant with the said Advisory.
3. MARINA will issue a Memorandum Circular which provides policies, rules, and regulations for the approval of the conduct of the practical assessment revising the STCW Circular No. 2015-10. Specifically, Section 11 provides that ACs shall be subjected to regular monitoring by the Monitoring Division, random surveillance, to be conducted by the Surveillance Division and/or unannounced/random visit by the Board of Examiners (BOE).

This Memorandum Circular is scheduled to be presented to the MARINA Board on 09 March 2022 and shall take into force 15 days upon approval and publication.

PHILIPPINE MEASURES

Way Forward

4. On the invitation of MARINA, the IMO, under its Integrated Technical Cooperation Program (ITCP), conducted a National Virtual Course on Assessment and Examination of Seafarers from September to October 2021 to key personnel and officials MARINA, CHED, and other relevant maritime institutions ([Attachment 13](#)).

As a result of the workshop, a course package was designed for purposes of cascading what the participants learned during the IMO workshop to their own institutions and subsequently to all maritime assessors of the ACs, MHEIs, and MTIs in coordination with the MARINA Training Institute (MARTI). In addition, it also aims to serve as the orientation materials for the ACs to be conducted by the BOE.

Factual Evidences

Attachment 54	Letter-Notification to Protect Marine and Engine Officers of the Philippines, Inc.
Attachment 56	Detailed Evaluation of PROTECT's Compliance Documents re ECAR
Attachment 56-F	PROTECT - Rectified Practical Assessment Scenario for Grievance 15
Attachment 48	Form AD-41: Practical Assessment Scenario Validation Form
Attachment 13	IMO Consultants' Report on National Training Course on Assessment and Examination of Seafarers (Phase 2)

KEY AREA FIVE

ON-BOARD TRAINING

On-board Training

SHORTCOMING 7

Therefore, the Philippines' authorities do not ensure that the activities concerning on-board training conducted by the MHEIs ensure that the on-board training is structured as necessary to achieve the prescribed standards of competence by all students, as required by the STCW Code.

During the inspection, several shortcomings were established in relation to on-board training under the following categories:

Grievance 16

Inconsistencies in the information documented in the Training Record Book (TRBs)

In accordance with Regulations II/1 and III/1 of the STCW Convention and Sections A-II/1.6 and A-III/1.2 of the STCW Code, Parties are required to ensure that every candidate for the certification as OOW and OEW, as appropriate, follow an approved programme of onboard training which is adequately documented in an approved training record book

However, the inspection identified that there was no record in the TRBs concerning the performance of tasks associated with the competences required by Table A-II/1 and Table A-III/1 of the STCW Code, although these competences were marked as demonstrated.

In addition, when there was a record of the performance of relevant tasks, the dates indicating the accomplishment of those tasks were later than the dates on which the respective competences were recorded as having been demonstrated.

In other cases, there were tasks, such as those related to the COLREGs, in which the ***knowledge and application of all regulations were demonstrated on the same day or over two consecutive days***, a situation that is not possible as a ship cannot be, for instance, in the same day or even in a two-day period in the middle of the ocean and in coastal waters, in polar waters and tropical waters, in heavy traffic and without traffic at all.

Hence, as evidenced by the inconsistencies in the information documented in the TRBs, ***the MHEIs do not ensure that the on-board training is structured as necessary to achieve the prescribed standard of competency, as required by Section A-I/6.1.1 and Sections A-II/1 and A-III/1 of the STCW Code.***

Therefore, these inconsistencies indicate that the education is in fact not provided in an appropriate manner and the experience on board is not fully acquired by the students.

On-board Training

SHORTCOMING 7

Therefore, the Philippines' authorities do not ensure that the activities concerning on-board training conducted by the MHEIs ensure that the on-board training is structured as necessary to achieve the prescribed standards of competence by all students, as required by the STCW Code.

During the inspection, several shortcomings were established in relation to on-board training under the following categories:

Grievance 17

TRB formats used do not fully allow verification that students received systematic practical training and experience in the tasks, duties and responsibilities of an officer at operational level

In accordance with Regulations II/1, III/1 and III/6 of the STCW Convention and Sections A-II/1.6, A-III/1.2 and A-III/6.2 of the STCW Code, Parties are required to ensure that every candidate for the certification as OOW, OEW and OEW, as appropriate, follow an approved programme of onboard training which is adequately documented in an approved TRB.

It was identified that TRBs only allowed one signature per task and several TRBs displayed signatures as confirmation that the tasks had been completed for only half of the tasks included in the TRB.

In addition, ***the dates of those signatures corresponded to the first or second months of the seagoing service period, yet there was no evidence in the TRBs of the training and tasks the students performed during the subsequent period on board.***

As evidenced by the data entered in the examined TRBs and due to their format, which had been accepted by the MHEIs concerned, ***the MHEIs do not fully ensure that the TRBs enable a verification of the systematic practical training received by the students and the experience gained by them in the tasks, duties and responsibilities of an officer at operational level.***

Therefore, the MHEIs do not fully ensure that the on-board training is structured as necessary to achieve the prescribed standard of competency, as required by Section A-I/6.1.1 and Sections A-II/1 and A-III/1 of the STCW Code.

On-board Training

SHORTCOMING 7

Therefore, the Philippines' authorities do not ensure that the activities concerning on-board training conducted by the MHEIs ensure that the on-board training is structured as necessary to achieve the prescribed standards of competence by all students, as required by the STCW Code.

During the inspection, several shortcomings were established in relation to on-board training under the following categories:

Grievance 18

The MHEIs do not define the specific training tasks or duties required to be undertaken by the students as part of the approved programme of on-board training

The STCW Code, in its Sections A-II/1, paragraph 6.1, and A-III/1, paragraph 2.1, respectively, requires that every candidate for certification as OOW or as OEW whose seagoing service forms part of an approved programme shall follow an approved programme of onboard training and that during the required period of seagoing service, the candidates receive systematic practical training and experience in the tasks, duties and responsibilities of an OOW or of an OEW, as appropriate.

Section A-I/2 of the STCW Code in its paragraph 5 requires that the service concerned is relevant to the qualification being applied for, bearing in mind that, apart from the initial familiarization with service in seagoing ships, the purpose of such service is to allow the seafarer to be instructed in and to practice, under appropriate supervision, those safe and proper seagoing practices, procedures and routines which are relevant to the qualification applied for.

In most cases, students on board had few opportunities to practice all the tasks and duties listed in their TRBs. The MHEIs had established as a requirement, as a way of considering the on-board training as completed, that at least a certain number of the tasks listed in the TRBs (this varied between 50% and 80% of the tasks) had to be signed as completed by the ship's master or responsible officer.

However, this allowed several full competences not to be practised and demonstrated and, therefore, not subject to a full assessment.

Other MHEIs required students to carry out remedial actions when they did not have the opportunity to practise either several defined tasks, or a percentage of the tasks defined in the TRB. These remedial actions were extra classes on the subjects not practised on board or individual meetings of about 15 minutes with an instructor or assessor.

However, these actions could be performed without any practical component and, therefore, were inconsistent with on-board training practice and experience.

Hence, as evidenced by the fact that the ***MHEIs do not ensure that all tasks, duties and responsibilities required to be undertaken by the students as part of the approved programme of on-board training, the on-board training is not structured as necessary to achieve the prescribed standard of competency, as required by Sections A-II/2 and A-III/1 of the STCW Code.***

SHORTCOMING 7

Therefore, the Philippines' authorities do not ensure that the activities concerning on-board training conducted by the MHEIs ensure that the on-board training is structured as necessary to achieve the prescribed standards of competence by all students, as required by the STCW Code.

During the inspection, several shortcomings were established in relation to on-board training under the following categories:

Grievance 19

The MHEIs do not keep records to ensure verification of the completion of the compulsory watchkeeping duties by the students

JCMMC No. 1 of 2019 in its section 22 paragraph 1 requires that, as a general rule, MHEIs shall ensure that all students in the BSMT and BSMarE programs who have 'completed classroom instruction for OBТ' as per Commission and Maritime Administration approved curriculum shall be provided with an onboard training slot to complete the study programme followed (i.e., BSMT or BSMarE) and be granted with corresponding degree.

Section 2 'OBТ requirements' of Annex B of JCMMC 01 series 2019 provides that "the OBТ requirement shall be complied with by undergoing and completing not less than 12 months seagoing service, which shall include the performance of bridge watchkeeping duties for a period of not less than six months [...] documented in the Training Record Book.

Moreover, the same Section 2 of Annex B of JCMMC 01 series 2019 provides that "the performance of bridge watchkeeping duties shall be documented using the Daily Journal of Bridge Watchkeeping Duty prescribed by the Maritime Administration".

These provisions are relevant to the OBТ of the BSMT programme. The provisions for the OBТ of the BSMarE programme laid down in the said Section 2 of Annex B of JCMMC 01 series 2019 are similar as regards the watchkeeping duties. Furthermore, Section 3 of Annex B of JCMMC 01 series 2019 requires that "the MHEIs shall have a clear and comprehensive system covering the implementation requirement within its QSS."

Nevertheless, ***the inspected MHEIs do not keep copies of the completed daily journals and, therefore, full evidence of the watchkeeping duties is not retained.***

Moreover, **the MHEIs keep the students' certificates of service, which are issued by the ships' masters, but those certificates included only the total duration of the period spent on board by the student.**

Hence, as evidenced by the lack of relevant records concerning watchkeeping duties performed by the students:

c) the MHEIs do not ensure that the verification of the performance of such watchkeeping duties by the students, as well as the compulsory seagoing service, as required by Regulations II/1, III/1 and III/6 of the STCW Convention, can be conducted;

a) the MHEIs do not ensure that a systematic practical training is received by the students and experience is gained by them in the tasks, duties and responsibilities of an officer at operational level, as required by Sections A-II/1.6.1, A-III/1.2.1 and A- III/6.2.1 of the STCW Code, and, therefore; and

b) the MHEIs do not ensure that the on-board training is structured as necessary to achieve the prescribed standard of competency as required by Section A-I/6.1.1 of the STCW Code.

On-board Training

SHORTCOMING 7

Therefore, the Philippines' authorities do not ensure that the activities concerning on-board training conducted by the MHEIs ensure that the on-board training is structured as necessary to achieve the prescribed standards of competence by all students, as required by the STCW Code.

During the inspection, several shortcomings were established in relation to on-board training under the following categories:

Grievance 20

No procedures are applied for those students who completed the on-board training six years or more after having completed their theoretical studies

Regulation I/2, paragraph 12 requires that each Party shall ensure that certificates are issued only to candidates who comply with the requirements of this regulation.

Regulation I/2, paragraph 13 requires that candidates for certification shall provide satisfactory proof:

- .1 of their identity;
- .2 that their age is not less than that prescribed in the regulation relevant to the certificate applied for;
- .3 that they meet the standards of medical fitness specified in section A-1/9 of the STCW Code;
- .4 of having completed the seagoing service and any related compulsory training required by these regulations for the certificate applied for; and
- .5 that they meet the standards of competence prescribed by these regulations for the capacities, functions and levels that are to be identified in the endorsement to the certificate.

Regulation I/11 requires that each party shall compare the standards of competence, which it required of candidates for certificates issued before 1 January 2017 with those specified for the appropriate certificate in part A of the STCW Code, and shall determine the need for requiring the holders of such certificates to undergo appropriate refresher and updating training or assessment.

The visited MHEIs have not implemented procedures requiring refresher training, as established by JCMMO No. 1 of 2019, for those who completed their on-board training six years or more after having completed their education and training, as they have not yet been developed by the MHEIs or by MARINA.

The EMSA team identified cases of students who took more than ten years to graduate after completing the three years of studies. This lack of provisions was recurrent, since the EMSA inspection in 2013 identified students who had completed their on-board training 22 years after completion of the theoretical part of the MET programme. In 2017, the EMSA team found that CHED had not yet established any policy in this regard although the team identified cases of students having completed their on-board training more than ten years after the theoretical studies.

This is important as the students eventually are certified but not in line with the meanwhile adopted amendments to the STCW Convention and Code. In case candidates complete the onboard training after new amendments have been adopted, they are not certified in line with the regulations in force at the time of the issue of their CoC. This is because the assessment of competence that they are subjected after completing the on-board training does not cover all competences and required training as established in Tables A-II/1, A-II/2, A-III/1 and A-III/2.

Such assessment of competence does not cover all competences. The achievement by a candidate for certification of all the standards of competence required for a given CoC can only be fully verified by the combined assessment provided by the evaluations conducted during education and training, and by the assessment of competence held after the on-board training and right before certification.

Hence, ***the lack of procedures for those students who completed the on-board training six years or more after having completed their theoretical studies may not ensure that the on-board training is structured as necessary to achieve the prescribed standard of competence.***

PHILIPPINE MEASURES

Immediate Measures

CHED-MARINA notified the 11 MHEIs of the specific findings noted in the ECAR ([Attachment 34](#)) relating to the Onboard Training. They were required to explain and give comments on the findings and to submit a corrective action plan to address the findings and prevent recurrence.

Based on the documents submitted by the 11 MHEIs, the evaluation team noted that while there were some initiatives already started by the 11 MHEIs to address the grievances, none of the corrections and corrective actions identified could sufficiently address this finding. Thus, in order to guide MHEIs on how to address these grievances, CHED-MARINA undertook the following:

1. MARINA and CHED reviewed the Onboard Training guidelines attached as annex B to the JCMMC No. 01, series of 2019 in order to improve the system of implementing the OBT program.

As a result, the **“Revised Guidelines on the Implementation of the Approved Onboard Training Programme for BSMT and BSMarE Students”** was approved by the CeB as Annex H ([Attachment 01-H](#)) to the Policies, Standards and Guidelines for BSMT and BSMarE Programs (JCMMC No. 01 series of 2022) ([Attachment 01](#)).

More specifically, Section 4.1.1.2 of Annex H provides guidance in the filling- of the Training Record Book and directives for the cadet to gather appropriate objective evidence as proof of actually having performed the assignment, tasks and duties while undergoing onboard training. Moreover, Section 5 directs the Onboard Training Office (OTO) of the MHEI to undertake the debriefing, validation of TRB, approval of the 12 or 36 months OBT and assessment.

PHILIPPINE MEASURES

Immediate Measures

- To address Grievance numbers 16 and 17 concerning the Training Record Book, the following policy improvements were made in the Revised OBT Guidelines requiring:
 - MHEIs to establish policies and procedures in the implementation of OBT program covering, among others, orientation/familiarization; enrolment; embarkation/disembarkation; validation of TRB and approval of twelve months seagoing service; validation and approval of the thirty-six months seagoing service; assessment; validation of Daily Journal of Watchkeeping Duties; the conduct of updating/refresher courses, as appropriate; and remediation program of students for shipboard training purposes (*Section 3.1.1, Revised OBT Guidelines*);
 - the OBT program to be managed by a fulltime Onboard Training Supervisor (OTS) who will not be assigned any additional teaching load to allow him to concentrate on his OBT duties (*Section 3.1.3.b, Revised OBT Guidelines*) particularly on the conduct of a comprehensive orientation to students on the proper way of accomplishing and filling-in of correct entries in the Training Record Book as well as gathering sufficient objective evidence/s as proof of having performed the required tasks in the TRB;
 - MHEIs, in the implementation of the OBT Program, to monitor the progress of students every month to regularly check actual tasks undertaken onboard against the TRB and provide guidance to ensure they are properly accomplished, including submission of appropriate objective evidence/s (*Section 3.1.3.b.vii., Revised OBT Guidelines*) and check for any unusual events or incidents. In order for MHEIs to effectively monitor the progress of a student's OBT, it is required under Section 3.1.9 that a monitoring system be established as part of its QSS. MHEIs are required to document all information gathered from the monitoring activity in a Monthly Progress Report;
- To address Grievance 18 concerning MHEIs not defining the specific training tasks or duties required to be undertaken by the students as part of the approved programme of onboard training, the preparation of an Onboard Training Guidance (OTG) for every student will be introduced as a requirement in Section 3.1.4 of the Revised OBT Guidelines.

PHILIPPINE MEASURES

Immediate Measures

- The duties and tasks contained in the OTG are the same as in the Training Record Book, however, these are classified into Sea Projects and Operational Tasks. The former refers to duties and tasks that can be performed by the cadets on their own time without interfering with the ship's operations and are required to be 100% completed during their onboard training. On the other hand, the operational tasks are those in which performance is dependent on actual ship operation or in accordance with the ship's Planned Maintenance System.
- In cases where the operational tasks are not completely performed during students' onboard training as determined during the verification process (Section 5) or if the result of the assessment (Section 6) indicates that the student cannot demonstrate the mandatory competences in the STCW Code, the MHEI shall institute appropriate Remediation Program (simulation/workshops practical exercises) in order for students to rectify such deficiency/ies, in accordance with the process specified in Section 7 of the Revised OBT Guidelines;

At least 70% of the identified operational tasks are required to be completed onboard. Detailed instructions on the use of this planning and monitoring tool are provided in the OTG Forms for Deck and Engine Cadets ([Attachment 01-H3](#) and [Attachments 01-H4](#)).

PHILIPPINE MEASURES

Immediate Measures

- To address Grievance 19 which pertains to MHEIs not keeping records to ensure verification of the completion of the compulsory watchkeeping duties by the students, Section 3.1.3.vii provides that copies of all OBT records of students, including monitoring records, shall be maintained and retained for at least 3 years from the completion of students' OBT, for verification purposes. The existing Daily Journal forms used in documenting the performance of mandatory watchkeeping duties were improved by requiring students to reflect the key areas learned during the watch.
- To address Grievance 20, in Section 3.1.1 of the revised OBT Guidelines, MHEIs are required to incorporate policies and procedures in implementing appropriate Updating and Refresher Courses,

Specifically, MHEIs shall ensure that students who failed to complete the OBT within 6 years from completion of classroom instruction shall be required to undertake the Updating Course, as prescribed by the Maritime Administration, and students who failed to complete the OBT requirements after 6 years from the completion of classroom instruction shall be required to undertake the Refresher Course, prior to the conferment of the degree as provided in Section 3.1.12 of the revised OBT Guidelines.

Also, a List of Bridge Watchkeeping Duties ([Attachment 01-H2](#)) and List of Engine-room Watchkeeping Duties ([Attachment 01-H3](#)) based on Chapter VIII of the STCW Code were provided in the Daily Journal Forms.

These lists were provided to guide the students in properly accomplishing the forms to ensure not to include entries that are not related to watchkeeping tasks;

In addition, in order to ensure uniformity of the Certifications and other forms used and submitted by students in complying with documentary requirements, the following forms are annexed:

PHILIPPINE MEASURES

Immediate Measures

- Standard Onboard Training Agreement ([Attachment 01-H5A](#) and [Attachment 01-H5b](#));
 - Certification to be issued by Shipping Company/Manning Agency ([Attachment 01-H6](#));
 - Certificate of Sea Service ([Attachment 01-H7](#)); and
 - Crew List, IMO FAL Form 5 ([Attachment 01-H8](#)).
- 2.** CHED-MARINA shall monitor and verify the compliance of the MHEIs with policies, standards, and guidelines (PSG) in the delivery of maritime education programs. The Outcomes Based Monitoring Instruments (OBMI) ([Attachment 03-E](#)) that is used in the conduct of monitoring had also been reviewed to ensure alignment with the revised PSG ([Attachment 01](#)) and the revised OB T Guidelines ([Attachment 01-H](#)).

Way Forward

- 3.** To update the MHEIs on the revisions on the Onboard Training Guidelines and to highlight their duties and accountabilities, CHED-MARINA shall conduct orientation and training-workshops for the designated Onboard Training Supervisors (OTS). Likewise, CHED and MARINA evaluators will undergo similar orientation and training-workshops.

The orientation and training-workshop for CHED and MARINA Evaluators will focus on the proper conduct of monitoring MHEIs' implementation of the OB T Program based on the Revised Onboard Training Guidelines, utilizing the revised OBMI. While the orientation and training-workshop for designated OTS will focus on the effective implementation, management, and supervision of the onboard training program of students. The complete details of the workshop are is contained in the attached Training Design. ([Attachment 40](#)).

PHILIPPINE MEASURES

Way Forward

4. To ensure effective implementation of the Revised OBT Guidelines, CHED and MARINA shall regularly analyze the results of monitoring in order to identify specific areas for improvement such as, but not limited to, the following:

- policies, standards, and guidelines;
- organizational arrangement or implementation scheme;
- instruments/tools/forms; and
- capacities of the officials and personnel involved in the implementation.

Analysis of monitoring results will be used as a basis in coming up with recommendations to solve any identified weakness in the system based on the identified gaps.

5. As provided in Section 3.1.9 of the Revised OBT Guidelines ([Attachment 01-H](#)), MARINA shall create in the MISMO portal a platform for every MHEI where they will in turn create an account to register the details of students who are officially enrolled in OBT ([Attachment 59](#)). MHEIs are required to upload to this account copies of documents and reports for purposes of monitoring the progress of students' OBT.

In this manner, the MARINA has firsthand access in verifying OBT-related information, which may be used as basis in imposing the sanctions stipulated in Section 8 of the Revised OBT Guidelines and other relevant rules and regulations. Moreover, the MISMO System will allow cadets and/or MHEIs to supplement their report with evidence (photos and videos) of actual conduct of onboard practical or training exercises.

6. MARINA will develop an Electronic TRB (e-TRB) which will be used by all cadets as a comprehensive record of practical training and experience at sea and provide detailed information about the tasks and duties which should be undertaken and the progress towards their completion. The duly completed e-TRB will serve as evidence to be used by the MHEIs, Onboard Training Supervisors, CHED- MARINA in monitoring compliance to the OBT guidelines.

PHILIPPINE MEASURES

Factual Evidences

Attachment 34	CHED Memorandum from the Office of the Executive Director No. 78, s. 2022
Attachment 01-H	Annex H - Revised Guidelines on the Implementation of Onboard Training for BSMT and BSMarE Students
Attachment 01	JCMMC No. 01, s. 2022
Attachment 01-H1	Annex H-1 – Daily Journal for Bridge Watchkeeping Duty
Attachment 01-H2	Annex H-2 – Daily Journal for Engine Watchkeeping Duty
Attachment 01-H3	Annex H-3 – Onboard Training Plan for BSMT
Attachment 01-H4	Annex H-4 – Onboard Training Plan for BSMarE
Attachment 01-H5a	Annex H-5a – Standard Onboard Training Agreement
Attachment 01-H5b	Annex H-5b – Standard Cadet Training Agreement
Attachment 01-H6	Annex H-6 – Certificate to be Issued by Manning or Shipping Company
Attachment 01-H7	Annex H-7 – Certificate of Sea Service
Attachment 01-H8	Annex H-8 – Crew List, IMO Form 5
Attachment 03-E	Annex E: Outcomes-Based Monitoring Instrument
Attachment 40	Timeline of Activities for the Capacity Building
Attachment 59	Approved Project Proposal on the Development of OBT Portal in the MISMO System

On-board Training

SHORTCOMING 7

Therefore, the Philippines' authorities do not ensure that the activities concerning on-board training conducted by the MHEIs ensure that the on-board training is structured as necessary to achieve the prescribed standards of competence by all students, as required by the STCW Code.

During the inspection, several shortcomings were established in relation to on-board training under the following categories:

Grievance 21

No measures are in place to ensure the performance of watchkeeping duties and on-board training for those students serving on ships engaged in domestic trade

Sections A-II/1, A-II/3, A-III/1 and A-III/6 of the STCW Code require that candidates follow an approved programme of on-board training which is closely supervised and monitored by qualified officers aboard the ships in which the approved seagoing service is performed.

The MHEIs do not ensure that students completing their seagoing service on ships serving in domestic trade and on which several other students also are completing their service, are given sufficient opportunity to complete their watchkeeping duties.

Equally, ***they do not guarantee that their on-board training is closely supervised and monitored by a qualified and certificated officer onboard the ship in which the seagoing service is performed.***

The inspection revealed cases in Cebu University and in Baliwag in which 11, 16 or even 37 deck cadets were on board those ships, on which there were only two deck officers and the master, in particular. Given that masters and officers must carry out their standard duties, it is not possible that sufficient supervision is provided to such a large number of cadets at the same time. Those MHEIs do not provide other evidence of the required closely supervision and monitoring by the officers aboard the ship in those cases and evidence of the implementation of the established system for monitoring the students undergoing OBT, as required by section 3.7 of Annex B of JCMCMC 01 series 2019, in the cases identified.

Hence, ***the MHEIs do not ensure that the on-board training on board ships engaged in domestic trade are structured as necessary to achieve the prescribed standards of competence.***

PHILIPPINE MEASURES

Immediate Measures

1. MARINA issued Memorandum Circular No. 2022-01, series of 2022 ([Attachment 09](#)), which pertains to the guidelines for the onboard training of cadets on Philippine-registered ships engaged in domestic shipping. The objectives of this Circular are:
 - a. To set the number of cadets onboard Philippine-registered ships engaged in domestic ships to ensure that cadets are closely supervised and monitored by a qualified officer/s to receive structured practical training and experience in the tasks, duties and responsibilities of an officer in charge of a watch as required by the STCW Code during onboard training on Philippine-registered ships;
 - b. To ensure that the onboard training is documented in an approved Training Record Book (TRB) and Daily Journal of Watchkeeping Duties;
 - c. To maintain a list of Philippine-registered ships showing the number of cadets that each ship can accommodate for On-board Training (OBT) based on the criteria set in this Circular; and
 - d. To contribute to the development of a pool of competent and trained Filipino seafarers.
- This Circular requires shipping companies accommodating cadets onboard their ships to have clear and comprehensive policies and procedures covering the implementation of OBT requirement in its Quality Standards System (QSS) or Safety Management System (SMS) Manual as prescribed in the OBT Guidelines annexed to the JCMMC No. 01, series of 2022, which shall cover among others, orientation / familiarization of cadets, designation of shipboard training officer, conduct of onboard training, embarkation/disembarkation of cadets, and issuance of certificates of sea service.

PHILIPPINE MEASURES

Immediate Measures

In determining the number of cadets to be accommodated onboard the Philippine-registered ship, the following criteria shall be taken into consideration:

- a. Cadets shall be provided with suitable accommodation onboard for the whole duration of the OBT;
- b. Cadets shall be allocated with appropriate life-saving appliances;
- c. Cadets undergoing onboard training must be closely supervised and monitored by the qualified officers referred to as Shipboard Training Officer (STO). Each officer may be assigned with not more than three (3) cadets per work shift of watchkeeping duty/sea watch and in-port watch; and
- d. The total number of persons allowed onboard reflected in the ship's safety certificate shall likewise indicate the number of cadets.

The STO or qualified officer shall be responsible for:

- a. Implementing the approved onboard training plan;
- b. Supervising and monitoring of the performance of cadets during the period of the OBT;
- c. Ensuring that each cadet receives systematic practical training and experience in the tasks, duties and responsibilities of a ship officer;
- d. Reviewing, examining, and ensuring, in a supervisory capacity, that the TRB and Daily Journal of Watchkeeping Duties are properly filled up and maintained, and that all other requirements are fulfilled including the progress of the training based on the OBT Plan; and
- e. Initialing or signing the TRB and the Daily Journal of Watchkeeping Duties after evaluating that the cadet has satisfactorily achieved the tasks and duties itemized therein.

PHILIPPINE MEASURES

Immediate Measures

The Company Training Officers (CTO) and the Master of the ship are also responsible for ensuring that the qualified officers/STO and cadets are effectively carrying out the activities in the OBT Plan, TRB and Daily Journal of Watchkeeping Duties.

This Circular also requires shipping companies to submit to MARINA a list of their ships and the number of cadets each can accommodate for publication.

This Circular also includes a control mechanism where MARINA shall conduct random inspection/monitoring of ships accommodating cadets based on the list published by the MARINA to verify compliance with the requirements including the verification of OBT procedures in the SMS manual during the conduct of ISM audit and safety inspection of the ship. The Philippine Coast Guard (PCG) is also allowed to monitor the onboard training of cadets as part of its inspection procedures on domestic ships.

PHILIPPINE MEASURES

Way Forward

2. MARINA will conduct capacity building ([Attachment 40](#)) on the guidelines for OBT on ships engaged in domestic trade for the following:
 - a. Onboard Training Supervisor of the MHEIs;
 - b. MARINA and PCG enforcement/monitoring personnel; and
 - c. Shipping companies' training officers.

Factual Evidence

Attachment 09	MARINA Memorandum Circular No. SC-2022-01
Attachment 40	Timeline of Activities for the Capacity Building

KEY AREA SIX

**ISSUE, REVALIDATION
AND REGISTRATION OF
CERTIFICATES AND
ENDORSEMENTS**

SHORTCOMING 8

Therefore, the Philippines' authorities do not ensure that the CoPs are issued in a format stating that the relevant requirements of training, competencies or seagoing service in the Convention have been met by the holder, in accordance with the definitions of CoP, as well as with the definition of CoC and the formats stipulated for endorsements for the issue of certificates, as provided for by the STCW Convention.

Grievance 22

For the issue of CoPs, MARINA uses the same format as for the issue of CoCs. In the field for the functions, the name of the training or qualification acquired under Chapter V or VI of the STCW Convention is incorporated, and the respective regulation is displayed. In the fields for the level and capacity, references to the capacity in which the holder could serve on board were inserted as was included in the seafarer's CoC.

Therefore, ***the CoP document included a capacity that was not related to the function nor to the regulation displayed and the text included in the functions was not related to one of the seven functions COPlisted in the introduction of Part A of the STCW Code.***

However, this is not consistent with the provisions of Regulation I/2, paragraphs 5 and 6, which provides the endorsements for certificates for masters, officers and radio operators required by Article 6 of the Convention to be in the format specified in Section A-1/2 of the STCW Code and, which excludes that format to be used for CoPs. In addition, and in line with the latter, the fact of issuing CoPs with the format of CoCs is not consistent with the provisions of Regulation I/1.30 and I/1.31, which defines a CoC and CoP, respectively.

Regulation I/1.30 provides that a CoC means a certificate issued and endorsed for masters, officers and GMDSS radio operators entitling the lawful holder thereof to serve in the capacity and perform the functions involved at the level of responsibility specified therein.

Regulation I/1.31 provides that a CoP is a certificate other than a CoC issued to a seafarer, stating that the relevant requirements of training, competencies or seagoing service in the Convention have been met. Therefore, levels of responsibility and capacity of the holder are elements to be included in CoCs, while CoPs are to state compliance with training, competencies or seagoing service requirements of the Convention.

PHILIPPINE MEASURES

Immediate Measures

1. MARINA has issued the following Memorandum Circulars, revising, among others, the format of the CoP provided under Article XI thereof, to wit:
 - Memorandum Circular No. SC-2021-04 ([Attachment 60](#)), "Revised Rules in the Issuance and Revalidation of Certificate of Proficiency (CoP) for Basic Training, Survival Craft and Rescue Boats (other than Fast Rescue Boats), Fast Rescue Boats, Advanced Fire Fighting, Medical First Aid, Medical Care, Ship Security Officer, and Security-Awareness Training and Seafarers with Designated Security Duties under Chapter VI of the STCW Convention, 1978, as amended"; and
 - Memorandum Circular No. SC-2021-05 ([Attachment 61](#)), "Revised Rules and Mandatory Minimum Requirements in the Issuance and Revalidation of Certificate of Proficiency (CoP) for Seafarers Serving on Tanker Ships, Ships Subject to the IGF Code and Ships operating in Polar Waters under Chapter V of the STCW Convention, 1978, as amended".

The new format of the CoP now contains the information provided under Section B-1/2 paragraph 5 of the STCW Code. See attached sample copy of CoP under Regulation V/1-1: [Attachment 62](#). The revalidation date of CoP has been omitted since a new Certificate is issued when a seafarer applies for revalidation.

Moreover, the new CoP bears a QR Code which when scanned, directs the user to an online portal where the details of the Certificate can be verified.

The MARINA Integrated Seafarers Management Online (MISMO) System, a digital platform used for all transactions relevant to assessment of competence and certification of seafarers, was also updated to reflect the new format of the CoP ([Attachment 63](#)).

PHILIPPINE MEASURES

Immediate Measures

- 2.** The MARINA sent the following communications to the IMO:
 - Memorandum Circular Nos. SC-2021-03, 2021-04, 2021-05 and 2021-06, Series of 2021 through a letter dated 04 November 2021 ([Attachment 64](#)); and
 - MARINA Advisory No. 2021-65 containing the new format of CoP through a letter dated 02 December 2021 ([Attachment 65](#)).
- 3.** The MARINA conducted an orientation to stakeholders on 25 June 2021 ([Attachment 66](#)) on the provisions of the newly issued Circulars. Moreover, personnel from the MARINA Central Office, satellite offices, and the MARINA Regional Offices involved in the issuance of the STCW Certificates were likewise oriented on 26 June 2021 ([Attachment 67](#)) and 17 July 2021 ([Attachment 68](#)).

In response, the IMO has issued STCW.2/Circ.104 dated 09 November 2021 ([Attachment 10](#)) and STCW.2/Circ.106 dated 20 December 2021 ([Attachment 11](#)), respectively.

PHILIPPINE MEASURES

Factual Evidence

Attachment 60	Memorandum Circular No. SC-2021-04
Attachment 61	Memorandum Circular No. SC-2021-05
Attachment 62	Sample copy of CoP
Attachment 63	Screenshots of MISMO System Verification Portal
Attachment 64	Letter of MARINA to IMO dated 04 November 2021
Attachment 65	Letter of MARINA to IMO dated 02 December 2021
Attachment 10	STCW.2/Circ.104
Attachment 11	STCW.2/Circ.106
Attachment 66	Post Activity Report of Orientation (25 June 2021)
Attachment 67	Post Activity Report of Orientation (26 June 2021)
Attachment 68	Post Activity Report of Orientation (17 July 2021)

Certification Process

Availability of limitations included in CoCs via MISMO not ensured

SHORTCOMING 9

Therefore, the Philippines' authorities do not ensure that any limitations included in the CoCs could be retrieved or made available through MISMO, in accordance with the STCW Convention.

Grievance 23

As required by Section A-I/2.9 in its sub-paragraph 3 competency details, including limitations, are one of the items that should be recorded and available, either on paper or electronically.

MARINA Integrated Seafarers Management System Online (MISMO) fulfilled the function of an electronic database of all certificates issued and no other copies of the certificates issued were kept. **However, as regards the competency details required in Section A-I/2, paragraph 9.3 of the STCW Code, no limitations included in the CoCs could be retrieved or made available through MISMO.**

PHILIPPINE MEASURES

Immediate Measures

1. MARINA issued Memorandum Circular Nos. SC-2021-03 ([Attachment 69](#)) and 2021-06 ([Attachment 70](#)) on 11 February 2021 where the corresponding Certificates of Competency (CoC) already bear a QR Code, as an additional feature, that will direct the user to the Verification Portal of the MARINA. After supplying the Serial Number of the Certificate to be verified, details of the certificate such as (1) the name of the seafarer to whom such certificate, endorsement or other qualification was issued, its relevant number, date of issue and date of expiry; (2) the capacity in which the holder may serve and any limitations attached thereto; and (3) the functions the holder may perform, the levels authorized and any limitations attached thereto will be displayed. All Certificates issued beginning 09 November 2021 are verifiable through the MISMO System. This is the result of the corrective measures undertaken pursuant to the said circulars.
2. The MISMO System was enhanced to include a drop-down menu where the Evaluator can select the appropriate limitation for every function ([Attachment 71](#)).
3. Personnel from the MARINA Central Office, satellite offices, and the MARINA Regional Offices involved in the issuance of the STCW Certificates were oriented on the new functionalities/features of the MISMO System and the revised QPR ([Attachment 72](#)).

PHILIPPINE MEASURES

Factual Evidence

Attachment 69	MARINA Memorandum Circular No. SC 2021-03
Attachment 70	MARINA Memorandum Circular No. SC 2021-06
Attachment 71	Screenshot of MISMO System Drop-down Menu for Limitation
Attachment 72	Post Activity Report of Orientation conducted dated 05 November 2021





PART III
CONCLUSION

The comprehensive and systematic review of the maritime education, training and certification system by the MARINA revealed that the strategic issues facing it require a multi-level approach. The challenges of the Philippine system are attributable to limitations and weaknesses at the individual personnel, the institutional and the system levels. The ECAR served as a critical driver for the Philippines to conduct systemic and institutional diagnostics to identify and formulate policies, strategies and measures including the identification of programs, projects and activities necessary to enhance the institutional competencies of CHED and MARINA, as well as the MHEIs, the MTIs, and the ACs.

As demonstrated by this report, the Philippines has undertaken rigorous and thoroughgoing activities to address the various remaining weaknesses in its maritime education and training, and certification system. The measures contained in this report have served as foundations and building blocks for CHED and MARINA in identifying various reform initiatives to guarantee that the requirements of the STCW Convention are met and to bring the Philippine system to a higher level of compliance. The many activities CHED and MARINA undertook to address the ECAR have helped both state agencies to implement measures ensuring that the national regulations on maritime education and training, and certification system are consistent with the requirements and objectives of the STCW Convention. Significantly, these activities also facilitated the identification of measures beyond those intended to address the findings in the ECAR. These are provided in Part IV, Way Forward.

The experience of CHED and MARINA in implementing institutional and systemic reforms revealed the importance of the whole industry approach in the conduct of institutional diagnostics and in the formulation of corrective measures. The inputs of the maritime stakeholders—MHEIs, MTIs, ACs, manning agencies and shipping companies—proved to be crucial in producing a robust Philippine Response. Their involvement in the process will hopefully ensure active participation in the implementation of the various measures and programs identified in this report. †



PART IV
WAY FORWARD

To ensure the the Philippines does not slide back but instead attain a sustained improvement of its maritime education and training, and certification system, CHED and MARINA agreed to put in place the following measures:

- A. Institutionalization of the conduct of Monitoring, Evaluation and Learning (MEL) in the implementation of maritime education and training programs, and assessment

CHED and MARINA agreed to develop a Monitoring, Evaluation and Learning (MEL) framework and plan in the implementation of JCMMC No. 01, series of 2022 in order to ensure that the goals and objectives of the new PSG governing BSMT and BSMarE are attained. The MEL framework and plans will help CHED and MARINA in identifying what works and what does not which are essential in the refinement and finetuning of the new Policies, Standards, and Guidelines of the BSMT and BSMarE programs.

- B. Addition of Electronic Record Book (e-TRB) as a feature of MISMO System

The MARINA will develop an online platform, hosted through the MARINA Integrated Seafarers Management Online (MISMO) System, that is capable of containing all documents or records of a cadet relating to his/her compliance with the mandatory Onboard Training (OBT) program for both BSMT and BSMarE. This will enable MARINA, CHED and the MHEIs to facilitate the evaluation, supervision and monitoring of the implementation of the OBT program, and ensure the performance of the required watchkeeping duties.

C. Automation of the Carrying Capacity Computation

In order to help the MHEIs determine the maximum number of students to be admitted per academic year, and to hasten the process of evaluation and monitoring of the carrying capacities of MHEIs, MARINA will automate the process of computation of the carrying capacity by developing a computer software.

D. Cooperation Programs on Development of the MET System

MARINA entered into a Memorandum of Agreement with Solent University in the UK in December 2020. The Agreement covers our partnership on the development and implementation of activities relating to the improvement of maritime education and conduct of research. The British Embassy in Manila had already offered to fund the initial scoping exercise in March 2022 to identify the training needs of our personnel particularly in the inspection and monitoring of MHEUs. Further, MARINA is currently in talks with the Gregorio Oca Leadership and Development (GOLD) Foundation for collaboration in the development of various capacity-building programs which will be offered by the MARINA Training Institute (MARTI) in Bacolod City for MARINA personnel and stakeholders.

Based on existing agreements, the MARINA will explore areas of cooperation and technical assistance with the World Maritime University (WMU) and the International Association of Maritime Universities (IAMU) to further strengthen collaboration with these institutions.

Since the European Commission's first audit of the Philippines in 2006, the country has made significant and tremendous progress in its compliance with the STCW Convention. The above measures demonstrate the commitment and determination of the Philippines to implement reforms towards full compliance, an effort which this Philippine Response has shown. ¹⁰



LIST OF ATTACHMENTS

Attachment Number	Description of Documents
Attachment 01	JCMCMC No. 01, series of 2022 - Revised Policies, Standards and Guidelines for the Bachelor of Science in Marine Transportation and Bachelor of Science in Marine Engineering Programs
Attachment 01-A1	Annex A1 - Curriculum Map for BSMT program
Attachment 01-A2	Annex A2 - Curriculum Map for BSMarE program
Attachment 01-B1	Annex B1 - STCW Competences Map for BSMT program
Attachment 01-B2	Annex B2 - STCW Competences Map for BSMarE program
Attachment 01-C1	Annex C2 - Programs of Study for BSMarE (3-1 and 2-1-1 schemes)
Attachment 01-D	Annex D - BSMT Course Package – Parts A to C - Course Specifications, Course Outline and Timetable, and Course Syllabus
Attachment 01-E	Annex E - BSMarE Course Package – Parts A to C - Course Specifications, Course Outline and Timetable, and Course Syllabus
Attachment 01-F	Annex F - Detailed Teaching Syllabus Template (Part D)
Attachment 01-G	Annex G - Course Outcomes assessment and Assessment Tools (Part E)
Attachment 01-H	Annex H - Revised Guidelines on the Implementation of Onboard Training for BSMT and BSMarE Students

Attachment Number	Description of Documents
Attachment 01-H1	Annex H-1 – Daily Journal for Bridge Watchkeeping Duty
Attachment 01-H2	Annex H-2 – Daily Journal for Bridge Watchkeeping Duty
Attachment 01-H3	Annex H-3 – Onboard Training Plan for BSMT
Attachment 01-H4	Annex H-4 – Onboard Training Plan for BSMarE
Attachment 01-H5A	Annex H-5a – Standard Onboard Training Agreement
Attachment 01-H5B	Annex H-5b – Standard Cadet Training Agreement
Attachment 01-H6	Annex H-6 – Certificate to be Issued by Manning or Shipping Company
Attachment 01-H7	Annex H-7 – Certificate of Sea Service
Attachment 01-H8	Annex H-8 – Crew List, IMO Form 5
Attachment 01-I	Annex I - Carrying Capacity and Instructions to MHEI
Attachment 01-L	Annex L - Sample Range of Percentage Marks and Their Corresponding Equivalents
Attachment 02	JCMMC No. 02, series of 2022
Attachment 02-A	Annex A - Evaluation Instrument – General Requirements for Application of Government Authority
Attachment 02-B1	Annex B1 - Evaluation Instrument – Specific Requirements for Application of Government Authority (Self-Assessment and CHEDRO)

Attachment Number	Description of Documents
Attachment 02-B2	Annex B2 - valuation Instrument – Specific Requirements for Application of Government Authority (Documentary Review and Inspection)
Attachment 02-B3	Annex B3 - Evaluation Instrument – Specific Requirements for Application of Government Authority – Onboard Training (Self-Assessment and CHEDRO)
Attachment 02-B4	Annex B4 - valuation Instrument – Specific Requirements for Application of Government Authority – Onboard Training (Documentary Review and Inspection)
Attachment 02-C	Annex C - Evaluation and Inspection Plan
Attachment 03	JCMMC No. 03, series of 2022
Attachment 03-A	Annex A: Monitoring Plan Form
Attachment 03-B	Annex B: Monitoring Finding and Corrective Action Report Form
Attachment 03-C	Annex C: Summary of Findings
Attachment 03-D	Annex D: Feedback Form
Attachment 03-E	Annex E: Outcomes-Based Monitoring Instrument
Attachment 04-A	CHED's Notices on Phasing out of BSMT and BSMarE Programs of relevant MHEIs
Attachment 04-B	Letter of CHED to of Disapproval of Applications of MHEIs
Attachment 05	TPME Resolution No. 08, s. 2022 - Moratorium on New Applications for Permit to Offer BSMT and BSMarE Programs beginning AY 2023-2024

Attachment Number	Description of Documents
Attachment 06	TPME Resolution No. 04, series of 2022 creating a TWG to Study the Institutionalization of the National Maritime Admission Examination (NMAE)
Attachment 07	MARINA Advisory 2021-21
Attachment 08	MARINA Memorandum Circular No. SC-2021-08
Attachment 09	MARINA Memorandum Circular No. SC-2022-01
Attachment 10	STCW.2/Circ.104
Attachment 11	STCW.2/Circ.106
Attachment 12	IMO Consultants' Report on National Workshop on the Implementation of the STCW Convention, 1978, as amended (Phase 1: Virtual Review and Scoping Exercise)
Attachment 13	IMO Consultants' Report on National Training Course on Assessment and Examination of Seafarers (Phase 2)
Attachment 14	IMO Consultants' Report on National Workshop on the Principles for the Design and Development of Curriculum for the Implementation of the STCW Convention, 1978, as amended (Phase 3)
Attachment 15	TPME Resolution No. 17 s. 2021
Attachment 16	Post Activity Report of Zonal Orientation from 27 September to 08 October 2021
Attachment 17	Post Activity Report of the conducted Zonal Orientation on November 8, 10, 12 and 22-26, 2021
Attachment 18	Timeline of Activities on the Development, Approval, and Implementation of Parts D (Detailed Teaching Syllabus) and E (Course Outcomes Assessment and Assessment Tools)

Attachment Number	Description of Documents
Attachment 19	Timeline of Activities for the Standardization of 2nd year and 3rd year level BSMT and BSMarE Programs
Attachment 20	Joint CHED-MARINA Advisory No. 02 series of 2022
Attachment 20-A	Revised Course Syllabus for Celestial Navigation (NAV 4) under JCMA No. 02, s. 2022
Attachment 20-B	Revised Course Syllabus for Voyage Planning (NAV 7) under JCMA No. 02, s. 2022
Attachment 20-C	Revised Course Syllabus for Leadership and Teamwork (Mngt 1) under JCMA No. 02, s. 2022
Attachment 21	Timeline of Activities for the Revision of Detailed Teaching Syllabus pursuant to under JCMA No. 02, s. 2022 No. 02, s. 2022
Attachment 22	Annual Monitoring Program for CY 2022
Attachment 23	Course Approval of the Revised GMDSS Radio Operators Training Standards
Attachment 24	Revised Training Standard for GMDSS Radio Operators
Attachment 25	MARINA STCW Circular No. 2018-02 - Standards for Mandatory Training Courses under the STCW Convention, 1978, as Amended
Attachment 26	Revised Training Standard for Refresher Course on Basic Training (Personal Survival Techniques)
Attachment 27	Revised Training Standard for Refresher Course on Fast Rescue Boat

Attachment Number	Description of Documents
Attachment 28	Revised Training Standard for Regular Course on Personal Survival Techniques (Under Basic Training Full Course)
Attachment 29	Post Activity Report on the conducted Orientation to Stakeholders dated 24 March 2021
Attachment 30	Inspection Reports under MARINA Advisory No. 2021-21 (COMPASS-MANILA-RBT, COMPASS Silang BT and RBT)
Attachment 31	Issued Notice of Deficiency (NOD), and Cease and Desists Order to MTIs pursuant to MARINA Advisory No. 2021-21
Attachment 32	MARINA Memorandum Circular No. SC-2021-02
Attachment 33	Form MD-02 Rev 02: Monitoring Instrument for Approved Training Courses (ATCs)
Attachment 34	CHED Memorandum from the Office of the Executive Director No. 78, s. 2022
Attachment 34-A	PMI Colleges Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-B	University of Cebu - METC Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-C	Our Lady of Fatima University (OLFU) Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-D	John B. Lacson Foundation Maritime University (JBLFMU) Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters

Attachment Number	Description of Documents
Attachment 34-E	Philippine Merchant Marine Academy (PMMA) Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-F	BIT International College's Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-G	Cristal E-College Compliance Detailed Evaluation with MARINA and CHED Communication Letters
Attachment 34-H	PNTC Colleges Compliance Detailed Evaluation with MARINA and CHED Communication Letters
Attachment 34-I	Baliwag Maritime Academy Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-J	Philippine Merchant Marine School (PMMS) Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 34-K	Asian Institute of Maritime Studies Compliance Detailed Evaluation Report with MARINA and CHED Communication Letters
Attachment 35	Special Order No. 101-22 - Monitoring of MEPs Offered by MHEIs
Attachment 36	Monitoring Report for MEP (UC-METC) including attachments 22-25 Feb2022
Attachment 37	Enhanced OBMI for MEPs under CMO No. 67, series of 2017
Attachment 38	Calibration Workshop on Conducting Audits and Report Writing dated 28 August 2021

Attachment 39	Post Activity Report of the Calibration Workshop dated 09 February 2022
Attachment 40	Timeline of Activities for the Capacity Building
Attachment 41	MARINA Letter to IMO regarding Request Further Assistance to the Philippines dated 02 February 2022
Attachment 42	IMO TCD Letter to MARINA dated 04 February 2022
Attachment 43	Memorandum of CHED to CHEDRO Informing Joint CHED-MARINA Monitoring Schedule
Attachment 44	Project Advancing Competencies for Excellence (ACE)
Attachment 45	Joint CHED-MARINA List of MHEIs to be Monitored for 2022-2024
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Attachment 73	MARINA Board Resolution No. 2021-04-01, series of 2021
Attachment 74	MARINA Strategic Voyage Plan 2028
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