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From: Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director

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To: Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

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Subject: COMMISSION STAFF WORKING DOCUMENT Union submission to the 12th session of the International Maritime Organization's Sub-Committee on Human Element, Training and Watchkeeping proposing amendments to the Terms of Reference of the Correspondence Group on the Development of Training Provisions for Seafarers on Ships Using Alternative Fuels and New Technologies

Delegations will find attached document SWD(2026) 29 final.

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COMMISSION STAFF WORKING DOCUMENT

Union submission to the 12th session of the International Maritime Organization's Sub-Committee on Human Element, Training and Watchkeeping proposing amendments to the Terms of Reference of the Correspondence Group on the Development of Training Provisions for Seafarers on Ships Using Alternative Fuels and New Technologies

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PURPOSE

This Staff Working Document contains a draft Union submission to the International Maritime Organization's (IMO) 12th session of the Sub-Committee on Human Element, Training and Watchkeeping (HTW 12). The IMO has indicatively scheduled HTW 12 from 23 to 27 February 2026.

This draft submission proposes to amend the Terms of Reference of the Correspondence Group on the Development of Training Provisions for Seafarers on Ships Using Alternative Fuels and New Technologies, in order to include training provision on wind propulsion systems.

This document follows the Union submission to HTW 11 proposing interim guidelines on training for seafarers on ships using new technologies and alternative fuels (HTW 11/7/5 Austria et al.) and the Union submission to IMO's HTW 12 proposing to include the generic interim guidelines on training for seafarers on ships using Alternative Fuels and Technologies in the revised STCW Convention.

EU COMPETENCE

The training and certification of seafarers is regulated at international level by the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978 (STCW Convention) of the International Maritime Organization (IMO), which was subject to a major revision at a Conference of Parties to the STCW Convention held in Manila in 2010 (Manila amendments). Further amendments to the STCW Convention were adopted in 2015 and in 2016.

Directive (EU) 2022/993¹ on the minimum level of training of seafarers incorporates the STCW Convention into Union law. It requires Member States to ensure that seafarers are trained as a minimum in accordance with the requirements of the STCW Convention as laid down in Annex I to the Directive (Article 3 of Directive (EU) 2022/993), including, where appropriate, the applicable provisions of the STCW Code (Article 1(21) of Directive (EU) 2022/993).

In light of all of the above, the present draft Union submission falls under EU exclusive competence, pursuant to article 3(2) TFEU as the interim guidelines, which, after finalised will be incorporated in the STCW Convention and Code, risk affecting or altering Union legislation and in particular Directive (EU) 2022/993.² This Staff Working Document is presented to establish an EU position on the matter and to transmit the document to the IMO prior to the required deadline of 19 December 2025.

¹ OJ L 169, 27.6.2022, p. 45.

² An EU position under Article 218(9) TFEU is to be established in due time should the IMO Maritime Safety Committee eventually be called upon to adopt an act having legal effects as regards the subject matter of the said draft Union submission. The concept of '*acts having legal effects*' includes acts that have legal effects by virtue of the rules of international law governing the body in question. It also includes instruments that do not have a binding effect under international law, but that are '*capable of decisively influencing the content of the legislation adopted by the EU legislature*' (Case C-399/12 Germany v Council (OIV), ECLI:EU:C:2014:2258, paragraphs 61-64). The present submission, however, does not produce legal effects and thus the procedure for Article 218(9) TFEU is not applied.

**DEVELOPMENT OF A SAFETY REGULATORY FRAMEWORK TO SUPPORT THE
REDUCTION OF GHG EMISSIONS FROM SHIPS USING
NEW TECHNOLOGIES AND ALTERNATIVE FUELS**

**Proposed amendments to the Terms of Reference of the Working Group on the
Development of Training Provisions for Seafarers on Ships Using Alternative Fuels
and New Technologies**

**Submitted by Austria Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark,
Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania,
Luxembourg, Malta, Netherlands (Kingdom of the), Poland, Portugal, Romania,
Slovakia, Slovenia, Spain, Sweden and the European Commission, acting jointly in the
interest of the European Union**

SUMMARY

Executive summary: This document proposes to amend the Terms of Reference of the Correspondence Group on the Development of Training Provisions for Seafarers on Ships Using Alternative Fuels and New Technologies, in order to include training provision on wind propulsion systems.

Strategic direction, if applicable: 3

Output: 3.8

Action to be taken: 22

Related documents: HTW11/11, HTW12/7 SDC12/INF.X, MEPC81/INF.39

Background

1 In the context of the development of a safety regulatory framework to support the reduction of GHG emissions, MSC 108 took into account the need of the industry to have technical and detailed guidance on training of seafarers working on ships using alternative fuels and new technologies and agreed that the development of such provisions would be included in the agenda of the 11th session of the HTW Sub-Committee, held in February 2025.

2 The HTW 11 agreed to develop generic interim guidelines on training for seafarers on ships using alternative fuels and new technologies in parallel with several individual sets of fuel/technology specific interim guidelines (HTW 11/11, paragraphs 7.8.3).

3 To progress the work intersessionally, the Sub-Committee agreed to establish the Correspondence Group on the Development of Training Provisions for Seafarers on Ships Using Alternative Fuels and New Technologies (Correspondence Group) (HTW 11/11, paragraph 7.17).

- 4 At the time, the Sub-Committee instructed the Correspondence Group to:
- .1 further develop draft interim guidelines on training for seafarers on ships using alternative fuels and new technologies as individual sets of interim guidelines, addressing:
 - .1 the use of methyl/ethyl alcohol as fuel, taking into account annex 2 to document HTW 11/WP.5, MSC.1/Circ.1621 on Interim guidelines for the safety of ships using methyl/ethyl alcohol as fuel, and relevant parts of documents HTW 11/7, HTW 11/7/1 and HTW 11/7/2;
 - .2 the use of ammonia as fuel, taking into account MSC.1/Circ.1687 on Interim guidelines for the safety of ships using ammonia as fuel, and relevant parts of documents HTW 11/7, HTW 11/7/1, HTW 11/7/2, HTW/7/6 and INF.7, and HTW 11/7/9;
 - .3 hydrogen fuel cell-powered ships, taking into account MSC.1/Circ.1647 on Interim guidelines for the safety of ships using fuel cell power installations, and relevant parts of document HTW 11/7/1;
 - .4 the use of LPG as fuel, taking into account MSC.1/Circ.1666 on Interim guidelines for the safety of ships using LPG as fuel, and relevant parts of document HTW 11/7/1;
 - .5 the use of hydrogen as fuel, taking into account relevant parts of documents HTW 11/7/2, HTW 11/7/6, HTW 11/INF.7 and HTW 11/INF.16; and
 - .6 battery-powered ships, taking into account document HTW 11/7/3; and
 - .2 submit a written report to HTW 12.

5 It was decided that such training provisions would not exclude any fuel or technology, but rather serve to establish a priority order in the work of the Sub-Committee (HTW11/11, paragraph 7.8.4).

6 In its written report to HTW 12, the Correspondence Group noted the views expressed by one participant that: (i) draft interim guidelines on training for seafarers serving on ships using wind propulsion systems should be developed and (ii) the Group's Terms of Reference (TORs) should be completed accordingly. In this context, the Correspondence Group invited interested Member States and international organizations to submit proposals to HTW 12 to consider the development of such draft interim guidelines (HTW 12/7, paragraphs 32 and 36.4).

7 The Correspondence Group further invited the Sub-Committee to consider re-establishing the Correspondence Group on the Development of Training Provisions for Seafarers on Ships Using Alternative Fuels and New Technologies to resume work on developing the fuel/technology-specific training guidelines, in accordance with its TORs.

8 In parallel, at MSC 110, the Committee assigned the SDC Sub-Committee to start working on the development of interim guidelines for the Safety of Ships Using Wind Propulsion and Wind Assisted Power, with a view towards updating the existing IMO instruments and possibly introducing a new Code once the industry has gained experience with the Interim Guidelines.

Context for the Proposals

9 The maritime industry is undergoing a technological transition towards decarbonized shipping³. In this context, the fleet transition to decarbonize shipping has started. Among the solutions being considered, wind propulsion is expected to play a major role.

10 Wind propulsion systems help reduce fuel consumption from ships / improve energy efficiency of the vessels and lower their GHG / air pollution. As a result, wind propulsion systems are expected to have a positive impact on the IMO (and EU) energy efficiency indices and carbon intensity metrics and emission trading schemes⁴.

11 Wind propulsion technologies (in particular thick sails, suction wings and rotor sails) have proven to be technologically mature and is expected to increase significantly in the coming year, both for primary wind-powered and wind-assisted vessels.

12 An overview of the main categories of wind propulsion technologies available is presented in the International Wind Ship Association (IWSA)'s publication *Wind Propulsion: Zero-Emissions Energy Solution for Shipping* (January 2024) (MEPC 81/INF.39) and the European Maritime Safety Agency (EMSA)'s publication *Potential of Wind-Assisted Propulsion for Shipping* (November 2023)⁵. As referenced in the later, in 2023, companies from Finland, France, Germany, Italy, the Netherlands, Norway, Spain and the United Kingdom had already installed wind propulsion systems on vessels flying their flag, and others (China, Israel, Japan, Sweden) were in the process of doing so.

13 In Q3 2025, 77 ships (representing 4.482.729 tonnage of wind-powered cargo carrying capacity) have been equipped and 7 more are wind-ready⁶. In 2026, 130 ships with wind propulsion systems will be sailing and in 2030, it is estimated that this number will have reached 1600⁷.

14 Ships that are or will be equipped with wind propulsion systems (whether following retrofits or newbuilds), as principal or auxiliary means of propulsion, could represent 40 to 45% of the global fleet (i.e. about 40 000 ships) by 2050⁸.

15 All categories of ships are impacted (General Cargo, Tanker, Bulk Carrier, Cement Carrier, Container, Ro-Ro, Ferry, Supply Vessel). There are already five primary wind ships in operation (each over 400 GT), the largest being a 136m 5,000 GT RoRo and there are at least 10 on order ranging from 50-80% wind driven⁹.

16 One of the key challenges arising from this technological transition is the need for additional and specific training for seafarers and the associated risk of crew shortages if seafarers do not acquire the necessary skills. To ensure a safe and efficient holistic operation

³ In April 2018, the IMO agreed to align itself with goals of the United Nation's Paris Agreement and reduce the greenhouse gas (GHG) emissions from shipping. The IMO's initial GHG-reduction strategy (Resolution MEPC.304(72)) included an ambition to reduce annual emissions by at least 50% by 2050 (compared to 2008). This strategy was revised in June 2023 (Resolution MEPC.377(80)), increasing the levels of ambition to reaching net-zero GHG emissions by or around 2050, giving impetus for an international shift towards the use of alternative sources of power, such as zero carbon technologies and fuels.

⁴ Wind propulsion is a recognised energy efficiency technology under IMO. Vessels with such systems installed are expected to realise benefit when it comes to compliance with the Regulations that have been included under the MARPOL convention Annex VI during the last decade, namely Energy Efficiency Design Index (EEDI), Energy Efficiency Existing Ship Index (EEXI) or Carbon Intensity Indicator (CII).

⁵ <https://www.emsa.europa.eu/publications/reports/item/5078-potential-of-wind-assisted-propulsion-for-shipping.html>

⁶ <https://www.wind-ship.org/>

⁷ Wind Ship French Association source.

⁸MEPC 81/INF.39 (paragraph 19).

⁹ ISWG-GHG20/2/17.

of vessels equipped with wind propulsion systems, seafarers should acquire the necessary competences to work with automated, semi-automated or more manually operated sail systems; and to adopt new approaches to navigation, maneuvering and maintenance notably.

17 Although the familiarisation currently provided by equipment manufacturers, through shipowners, is essential, it might not be sufficient to cover the above stated needs entirely. This is due to several factors, such as: significant variability between manufacturers' trainings in terms of duration, target audience, content and follow-up; lack of coverage of more general skill gaps identified by the industry in wind propulsion operated ships; and absence of regulation / oversight of these contractual trainings.

18 The "CREwWIND" online course provides an example of an initial step, offering a familiarization module on the use of wind propulsion for ships. As stated in its presentation, the course *"is not intended to replace specific or even practical training courses, but rather to be an essential resource upstream of the process of training seafarers in wind propulsion"*¹⁰.

19 Therefore, it is necessary to anticipate and address the growing demand for specialized, standardized and supervised training, similar to the approach taken by the HTW Sub-Committee for other fuels and new technologies referred to in paragraph 4.1.1.

Proposals

20 The co-sponsors propose expanding the Working Group's Terms of Reference to include the development of draft interim guidelines on training for seafarers on ships using wind propulsion systems, taking into account existing training recommendations or courses already established in some countries.

21 The co-sponsors invite members of the Working Group to inform the coordinator if they wish to volunteer to participate in the preparation of the foundational document for the subject interim guidelines.

Action requested of the Sub-Committee

22 The Sub-Committee is invited to consider the information and proposals in this document; and take action, as appropriate.

¹⁰ https://ensm.scenari.online/siteWeb/_siteWeb_CREwWIND_GB/