

Mona Lisa Project: Evidence of False Seafarer Certification

Project Report

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Summary

The scale of the problem of false seafarer certification is unquantifiable. It is unquestionable that at any given time there could be literally thousands of false certificates in circulation. The few hundred that the IMO are aware of are published in the STW 40/4, 41/4 and 42/4 reports and of these, only a tiny, single figure number are forged or altered. Without more information the rest may well be bona fide certificates supported by false documentation and obtained from flag state administrations. If this is the case then this is not an issue that can be addressed or resolved by focusing on the seafarers.

Seafarer certificates in their present form and the utility of any future certification will remain questionable and potentially suspect if they originate from sources – usually flag state administrations - that do not verify the supporting evidence behind every certificate they issue. Without this basic substantiation at state level any attempt to increase security and combat false certification is inherently flawed.

Glossary

CoC	Certificate of Competence
CEQ	Certificate of Equivalent Qualification
IMO	International Maritime Organisation
ITF	International Trade Federation
ILO	Independent Labour Organisation
MCA	UK Maritime & Coastguard Agency
OOW	Officer of the Watch
STW/STCW	Standards of Training, Certification & Watchkeeping

Background

The extent and nature of the problem of false certification among seafarers is not known. This is surprising in view of the IMO's position that: "The competence of seafarers is the most crucial factor in the safe and efficient operation of ships and has a direct impact on the safety of life at sea and the protection of the marine environment."

The IMO Convention on Standards of Training, Certification and Watchkeeping (STCW) is a comprehensive set of international regulations intended to ensure that the highest standards of seafarers' competence are maintained globally.¹ The IMO itself operates a web-based verification service which was used over 14,000 times in 2010, and it also collates information on false certificates detected, in the regular STW publications produced by the organisation, e.g. STW 42/4, the most recent update. As with criminal cases on land however, it would be overly optimistic to assume that the cases that come to the attention of the authorities are the full total, in the same way that police convictions sadly are not the sum of all crimes.

Objective

This project set-out to gather evidence of false certification among the seafarer community.

Definitions

Several definitive issues became apparent within the project. There is a categorical distinction between faked or forged certificates and genuine ones and these categories may be described as follows:

1. Certificate was never issued by an administration and has been compiled by someone not authorised to do so; or
2. Genuine issued certificates that have been altered without authorisation (both of these can be described as obtained by forgery).
3. Genuine certificates that should not have been granted, for example, where they were supported by fraudulent evidence. These can be described as faked.
4. Genuine certificates that were issued for cash. There were several allegations that certificates can be easily available for cash and these certificates can be described as obtained by bought.

The term "Certificates" is itself extremely broad. Some certification was found much easier to fake than others. For example, sea-service records are much easier to fake than an entire Certificate of Competence.

¹ www.marisec.org/quickguide.htm.pdf

Project Methodologies

Multiple new and traditional methods were employed to gather information and gain attention for the project among the seafarer community.

1. A website was set-up where visitors were able to leave anonymous comments as well as take part in a structured online questionnaire comprising both closed and open questions. (www.maritimefacts.com).
2. Maritime publications were alerted and ran stories and articles on the project, including Nautilus (the seafarer's union newspaper) available in print and online, Digital Ship (online and print versions), Seaways, Safety at Sea, Fairplay, Maritime Reporter and Lloyds List. Of these, publication in Nautilus produced the biggest increase in website visits.
3. Traditional face-to-face interviewing was employed as well as telephone and email conversation, providing input from the major maritime stakeholders.
4. IMO STW false certificate records were obtained for 2007, 2008 (STW 41/4) and 2009 (STW 42/4), the most recent data available. This data was supplied only in .PDF format. All entries were re-typed into an Excel spreadsheet for analysis.
5. An email campaign was launched to encourage shipowners to visit the website. A list of 50 of the largest owner groups was obtained from IHS Fairplay and an email message sent to all prospective respondents on the list.
6. A discussion group was set-up on LinkedIn to encourage responses from respondents who were members of the BIMCO discussion forum, as well as other forums.
7. A Twitter feed was set-up to attract visitors to the website (@falseticket).

Methods 4 to 7 inclusive were carried-out without charge and outwith the original planned scope of the project.

Maritime Data Sourcing

1) Maritimefacts Website

The website (www.maritimefacts.com) attracted a total of 7,367 hits including 584 actual visits to the website. The website included the option to leave anonymous comments as well as the opportunity to complete an online questionnaire which required the user to identify themselves so that online identities could be verified. Neither option yielded responses.

2) Maritime Publications

Maritime Reporter and Lloyds List declined to run the appeal for information. Scanning Lloyds List it is clear that this is not a top story line over the recent past and publicity of the issue seems to coincide with IMO activity on the topic, with just three mentions in 2011. The most recent Maritime Reporter story on false certificates according to an online search was published in April 2002.²

Publications that published the appeal included:

- a. Nautilus (the seafarer's union newspaper) available in print and online;
- b. Digital Ship (online and print versions);
- c. Seaways, the Nautical Institute magazine;
- d. Safety at Sea;
- e. Fairplay.

Publication in Nautilus produced the most noticeable increase in website visits.

Newslink is an onboard CD-based publication with an extensive profile among Pacific seafarers. Publication of the survey questionnaire on the CD was agreed in principle but was not possible within the timescale of the project.

² Maritime Reporter: **Coast Guard Finds Fake Mariner Documents** Tuesday, April 30, 2002
A combined effort led by the Coast Guard Investigative Service and Coast Guard Marine Safety Office Miami has resulted in the arrests of foreign mariners on ships visiting Miami for using fraudulent merchant mariner licenses and training certificates. One mariner was arrested yesterday for operating with a fictitious Columbian International Convention on Standards of Training, Certification and Watch keeping for Seafarers (STCW) certificate.

3) Direct Interviewing

Traditional direct interviewing was the most successful method of eliciting response within this project. Interviews were carried-out under a strict promise of confidentiality and included discussion with:

- International Trade Federation
- International Maritime Organisation
- Nautilus
- Nautical Institute
- Maritime & Coastguard Agency
- Wallem Group
- Royal Fleet Auxiliary Master (retired)
- Oil tanker Master (retired)
- Middle East shipping company employee.

4) IMO's STW Records

STW 41/4 and STW 42/4 records comprising records of false certificates detected between 2007 and 2009 were obtained from IMO for analysis. These records are available online and were in .PDF format.

Software to convert .PDF files to Excel was employed to convert the STW data but failed. As a result all records available were manually transcribed to Excel.

Title	Date	Number of Records
STW 41/4	2009	350
STW 42/4	2008	404
STW 42/4	2007	97

Number of Records Held By IMO Self-Reporting Scheme

5) Email Website Campaign

An email campaign was launched to encourage shipowners to visit the website. A list of the Top 100 (the largest) owner groups was obtained from IHS Fairplay. 104 emails were sent on January 6th 2012. The network immediately returned fourteen emails with incorrect addresses.

One email was received warning that the network administration at the addressee suspected the original email was spam.

By 30th January no replies had been elicited to the email campaign.

6) LinkedIn Discussion

A discussion group was set-up on the BIMCO group section of the LinkedIn website (www.linkedin.com).

This yielded useful comments from members of the group who split into two camps, some claiming very few false certificates were extant (estimating fewer than 5%) and others who believed that possibly over 20% of extant certificates were false. Some also usefully differentiated between false certificates (forged) and genuine certificates undermined by false or non-existent qualifications.

7) Twitter

A Twitter account (@falseticket) was set-up to attract visitors to the www.maritimefacts.com website. It was not possible within the scope of the project to measure click-through from the Twitter account to the website. Click-through would almost certainly have been recorded as originating from the network, which was the majority of sources listed using the website's C-Panel analytics.

Methodology Review

The website-based primary methodology was unsuccessful. Although several hundred individuals visited the website, none contributed useable data to the project.

For the future, although LinkedIn discussion groups were more promising in terms of yielding data, they are in the main unlikely to attract serving seafarers. Restrictions on bandwidth at sea are still an obstacle to Internet access and physical web-browser access onboard is still sometimes limited.

Data collection was not optimised by the project schedule that put Christmas with all its attendant disruption in the middle of the data collection period. Digital and print media exposure increased awareness of the website but elicited no research responses. Website visits notably increased immediately following publication of the data appeal in Nautilus magazine, which was by far the most effective source of publicity.

Direct interviewing still appears to be the only reliable method of eliciting information in this industry, either by telephone or face to face. There are obvious cost-implications in this approach as well as segmentation issues. While it is obviously straightforward to interview large companies and government and non-governmental organisations in major cities, interviewing in ports and onboard ships remains the only proven means of soliciting seafarer opinions en masse.

Hard Data: The STW Records

STW 40/4/Add.1

ANNEX

SUMMARY OF REPORTS RECEIVED ON FRAUDULENT CERTIFICATES RECEIVED

Date	Flag of ship	Document claimed to be issued by	Type of document found to be fraudulent	Type of fraud	Where and when reported/detected	Method of detection	Action taken	Comments
01.06.2008	N/A	Egypt	COC	Counterfeit	19/04/2006 Administration	Verification	Notice of Concern	
01.06.2008	N/A	Indonesia	COC	Counterfeit	08/06/2006 Administration	Verification	Notice of Concern	
01.06.2008	N/A	Indonesia	COC	Counterfeit	08/06/2006 Administration	Verification	Notice of Concern	
01.06.2008	N/A	Panama	COC	Altered Document	08/06/2006 Administration	Verification	Notice of Concern	
01.06.2008	N/A	Philippines	COC	Altered Document	04/09/2006 Administration	Verification	Notice of Concern	
03.06.2008	N/A	Panama	COC	Counterfeit	13/01/2005 Administration	Verification	Notice of Concern	
03.06.2008	N/A	Panama	COC	Counterfeit	13/01/2005 Administration	Verification	Notice of Concern	
03.06.2008	N/A	Liberia	COC	Counterfeit	05/04/2005 Administration	Verification	Reported to Liberia	
03.06.2008	N/A	Indonesia	COC	Counterfeit	14/04/2005 Administration	Verification	Notice of Concern	
03.06.2008	N/A	Georgia	COC	Counterfeit	24/07/2005 Administration	Verification	Notice of Concern	
04.06.2007	N/A	Indonesia	COC	Counterfeit	28/01/2007 Administration	Verification	Notice of Concern	
04.06.2007	N/A	Indonesia	COC	Altered Document	06/03/2007 Administration	Verification	Notice of Concern	
04.06.2007	N/A	Indonesia	COC	Counterfeit	12/06/2007 Administration	Verification	Notice of Concern	

I:/STW40/4/Add-1.doc

Sample page of STW data as published by IMO.

All STW data is set-out in this standardised format, comprising the data of the incident, the flag of ship onboard which the false certificate was detected, the flag that the document purported to be from and other information that might be relevant. Inconsistencies in data reporting make the utility of this information less than optimal. There is an inherent assumption necessary at the start, assuming that the ship flag is as IMO state it ought to be, the flag administration that reported the incident to the IMO. However, it is entirely possible that another PSC in fact reported the incident. In the case of the sheet selected at random above, marked "N/A" there is little evidence to support either view. Qatar submitted this particular report, but no-one felt it was necessary to detail the flag of the ships involved.

The documents involved in these instances are all labelled CoC (Certificate of Competence). This at least eliminates Certificates of Equivalent Qualification, but does not differentiate between OOWs, ratings, Masters or GMDSS qualifications. This Qatari report is unusual in reporting physically altered documents. Very few of these were found, less than 5% of the total. However, the description "Counterfeit" is again less than totally helpful as it can be taken to refer to falsely-issued genuine documents, documents that were never issued by an authorised body or altered documents issued by a genuine body, although these can be ruled out in this specific example.

Mona Lisa Project Report: Evidence of False Seafarer Certification

Describing the method of detection as “verification” was typical but not detailed. Email has since the original 2001 SIRC report increased the speed of verification out of all recognition, but still the process can take several days. What is most surprising from this example is the action taken by the Qatar PSC on finding false certificates. It is unclear from the record what form their Notice of Concern might take, but other PSCs record immediately barring the seafarer from their vessels when found with false certification. The UK MCA has powers of arrest as well as the statutory right of entry to homes and has used this on occasion in pursuit of cases of suspected false certification.

Ship Flag Reporting	Number 2007	Number 2008	Number 2009
All	97	421	350
Panama	0	322	284
St Vincent & Grenadines	0	3	76
Belize	34	0	32
Singapore	0	88	28
Hong Kong	26	0	23
Bolivia	10	0	11
Iran	21	0	0
N/A	4	0	0
Croatia	2	0	0

STW 40/4; 41/4 & 2/4 2007-09 False Certificate Detection Records

The biggest research issue concerning STW data is that it is demonstrably incomplete. Reporting to IMO is not mandatory and many states with what might be assumed to be ample resource (e.g. Norway, Sweden, UK) reported no false certificates of any kind to IMO from 2007 to 2009 inclusive. Notwithstanding this, MCA reported finding a small number of false certificates during the course of this research.

Types of False Certificate	Number 2009	%
Chief Engineer	76	22%
Engineer Officers	66	19%
Master	47	13%
Chief Officer	35	10%
Non-specific CoC	30	9%
GMDSS	27	8%
Deck Officers	14	4%

STW 42/4 09 Most Frequent False Certificate Types

Mona Lisa Project Report: Evidence of False Seafarer Certification

Inconsistencies in IMO STW reporting abound, but from the records there are proportionately more reported falsifications of senior rank certificates. Detailed analysis of the STW data (e.g. cluster analysis) was not carried-out for several reasons. Above all else, the IMO records are incomplete with only a few flag administrations reporting false certificates to IMO at all. Any analysis at this stage would only at best identify data patterns within the minority of IMO signatory states who reported any information at all. Other issues, such as the lack of consistent reporting, lack of detail and semantic issues such as the words “counterfeit” or “verification” being used to cover a number of different events make analysis fundamentally unreliable for any extrapolation beyond what is acknowledged to be an incomplete dataset.

According to the published IMO STW figures just five flag administrations reported false certificates to IMO in 2007. These are the sum total of all false certificates reported to IMO during this three-year period, and the sum total of all flag states reporting them. Direct evidence from MCA states that more false certificates were reported in this time-frame. The records are incomplete. Nearly a decade after the IMO decided that reporting false certificates would help combat the problem, this is not mandatory.

The 23rd session of the IMO Sub-Committee took place in January 2002. It recommended that:

- 1) Fraudulent certificates detected during regulation verification procedures should be reported to IMO; and
- 2) PSC Officer should forward to IMO particulars of the case as soon as practicable.

Further, the IMO agreed that a timely exchange of information was an important and practical measure to help prevent unlawful practices associated with CoCs. One year later the IMO reported it had received evidence of fraudulent certification from seafarers, administrations and shipping companies. Four years after that, in the 83rd session in October 2007 the IMO introduced the standardised reporting format detailed at the beginning of this section of the report and in their own words “urged member governments and organisations to use it when reporting to the secretariat.”

The Manila Amendments introduced this year (2012) are intended to fundamentally revise seafarer training and certification. At the same time, detection of false certification to the IMO is still entirely voluntary. The IMO website was used over 14,212 times in 2010 times to check and validate seafarer certificates in 2010. The outcomes are not recorded.

Prejudicial Association

Examining the STW data available, in interviews and on the BIMCO LinkedIn website the same prejudicial association was apparent repeatedly. Flag states that report many false certificates look as if they have a major problem. Similarly flag states whose certificates are falsified also appear to need to take action. At the same time it is hard to see whether either of these assumptions is true without more information, which is simply lacking from the STW records.

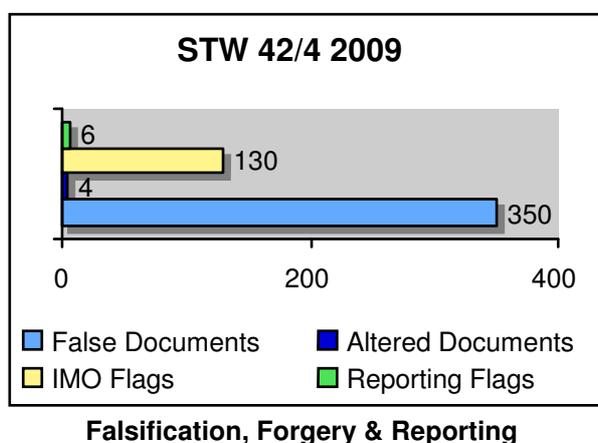
A flag state reporting many forged certificates can equally be seen to be addressing the problem and at the same time from a different perspective held responsible for it. For this reason there has been no attempt to analyse the supposed origins of false certificates. A further issue is the imprecise recording of the method of falsification in the records, from the laconic “counterfeit,” Panamanian Spanish, “forged” or in many cases, the simple acronym “CoC.” If a flag state is issuing genuine certificates without bona fide evidence to support them that is a different and much more endemic, serious and hard-to-address issue than seafarers themselves faking or making their own certificates. The latter are comparatively easy to check if the issuing flag state can be contacted promptly and the genuine article is available for comparison. A genuine certificate based on false evidence issued by a flag state may never be detected at all.

One direct quote from a BIMCO group discussion was particularly instructive:

“In Cyprus we have a very big problem - Syrian and Lebanese owned tonnage employs officers with false North Korean certificates. That is the major reason why ships of those nationalities do not call at Cyprus ports any more. They are detained by PSC and only released when official certified competency officers join the vessel. These vessels are regularly calling at other EU countries here in the Med and Black Sea without any problem whatsoever. That makes Cyprus look like we are the bad boys.”

Some flags are alleged to refuse to be named in the STW reports in order to save face, but a high level of false certificates from one flag administration does not necessarily mean there is a problem at state level. It is possible that people faking certification simply prefer to falsify documents from certain administrations. This may be because the documents are easy to fabricate or it may be that they are rarely checked for verification in their supposed state of origin. According to the MCA ten or a dozen countries may be online at any given time, all of them attempting to verify seafarer certificates. In most cases enquiries are dealt with in two to four days and 90% of all queries are answered within a week. However, it is a rare modern deep-water schedule that allows seven days in port. The length of time taken by some administrations to reply to certification queries suggests that some seafarers are allowed to sail before it can be definitely established that their certificates are valid.

Definitions: False, Forged or Faked?



The STW42/4 records for 2009 recorded just four altered or forged documents out of the 350 listed, 1.14%. However, it is important to keep firmly in mind the fact that these reports were submitted by just six of the 170 IMO full signatory flag state administrations (1.3%). With reporting being literally the exception rather than the rule it is impossible to quantify the total extant number of certificates that are false, whether they are genuine certificates that have been altered, entirely fake certificates or more disturbingly, genuine certificates that should never have been granted. Confirmed by direct evidence from ITF (see below), an unknown proportion of seafarer certificates may have been bought for cash from flag administrations.

On the evidence of the STW reports it would be easy to assume that outright forgery – fabricating a certificate – is comparatively rare. Notwithstanding the issue that so much is left out of the STW reports (the majority of flag states as a starting point) that any evidence from this source is circumstantial at best, few alterations of bona fide certificates are recorded. At one end of the scale some Western CoC documents incorporate passport-levels of security. The MCA CoC book for example has no less than thirty different security features such as stitching patterns in the binding, holograms, watermarked paper, colour printing, gold leaf designs and watermarked laminated photographs of the bearer. At this level of security fakery is rare but not still not unknown; one enterprising forger used yellow magic marker pen to simulate the appearance of gold leaf. At the same time, Polish certificates are still reported to be printed on cardboard and are comparatively easy to replicate.

Falsification is not restricted to CoCs alone. Where physical CoC books are complicated to fake then the evidence to obtain them is sometimes easier to obtain. Interviewees reported instances of examination results being falsified along with sea-service time, short-course certificates, fake upgrades of qualifications for examinations sat, medical certificates and other supporting documents necessary for bona fide certification. Sea-service time was an interesting issue in itself. Now that free-to-use websites such as

Mona Lisa Project Report: Evidence of False Seafarer Certification

www.marinetraffic.com provide AIS-based vessel passage histories to anyone with access to a computer it is easy to assemble voyage data including ports of call, dates and incidental details that could be used to establish a false history of sea service time onboard. Equally, agencies such as the UK MCA use the paid-for Lloyds List Intelligence product Sea-Searcher (<http://www.lloydslistintelligence.com/llint/ais.htm>) to check on exactly these details.

The rigour and degree of validating certificates differs around the world just as the level of security within documents differs as well as sometimes when it does not. Both the UK and Norway for example used to check the validation of just 10% of certificates they issued in order to detect forgery or fraud. While Norway still checks just 10%, the UK has changed its policy and now checks every single certificate applied for. The results have not showed a tenfold increase in detection rates, or indeed much observable difference in the incidence of attempted fraud at all. Whether this is attributable more to a highly honest UK seafarer population or the knowledge that every certificate will be thoroughly vetted is moot.

Not every IMO member state validates certificates the same way or to the same standard, at least according to anecdotal evidence. France has a reputation for lackadaisical checking whereas Bulgaria has a good reputation for rooting out fraud. Brazil is thought to take a long time checking anything whereas Ukraine is improving, albeit from a very low starting point, according to several sources. Panama has improved a little and St Vincent & the Grenadines are thought to be very keen to be seen to be addressing the issue.

A key issue is, as ever, the disparities between members of what purports to be a global training and certification system. As well as fundamental issues of resource at governmental level, entire procedures for granting certification vary. Anyone wanting a CoC in the Ukraine and Russia for example, applies to a harbour master rather than a government department. Where economic survival literally lies in the hands of individuals then there is an obvious risk that hard cash may become an acceptable means of validation.

More than one interviewee reported that Manila was rife with bribery and corruption at this level. One claimed it was possible to simply walk into government offices with cash and walk out with any certificate he cared to name. Another recalled being offered a Philippines CoC for US\$200 by a Manila taxi-driver, who added that another \$200 would see it got onto the central database. If this is true then the entire validation process becomes worthless overnight.

To illustrate how easy it can be to obtain false certification the ITF arranged for its General Secretary David Cockroft to be fitted out with a First Officer's CoC from Panama. Without the knowledge of the Panamanian representative at the IMO the ITF paid US\$4,500 to receive certification for which he had no qualifications or experience of any kind.

Mona Lisa Project Report: Evidence of False Seafarer Certification

As he said in a press release at the time, "Do you want someone like me, with no practical seafaring experience, steering a ship off your coast, or plowing through the same sea lanes as oil supertankers and crowded passenger ferries? This is an under-policed system that encourages bad operators to undercut good ones. It is courting human and environmental disaster."³

The Panamanian purchase took place in 2001. In September 2011 David Cockroft commented on the changes that had taken place over the decade. He reported "I visited Panama in 2005 and gave my seamen's book to newly elected Vice-President Arosemena so he could investigate the corrupt practices which produced the certificate. We are still waiting for a reply but it is a lot harder and more expensive to get a fake certificate from the Panamanian and other authorities than it was in 2000."⁴

³ The Panamanian flag administration response was to ask the British government to arrest Cockroft, who was interviewed before being released without charge. Special Branch, the agency usually responsible for UK state security issues rather than the Metropolitan Police who are responsible for criminal cases, interviewed him.

⁴ Interpress Service News Agency <http://ipsnews.net/print.asp?idnews=39123>

Conclusions, Biometrics & Identity Ghettos

The term “resource ghetto” has been used to describe situations within administrations or organisations where whatever the will, there is no resource available to address issues which are agreed to be important, such as false certification. In some cases the opposite is also true. In the UK, where the MCA employ over 300 staff at their modern, custom-designed Spring Place head office in Southampton, no false certification reports were submitted to IMO during 2007 to 2009 or if they were then the IMO did not publish them in the STW figures.

The MCA send over 400 verification emails per month checking CoCs and argue that verification is the best, most effective defence against false certificates remaining in circulation. Several other governments have argued for improved, more secure seafarer identity documents. Former Australian Transport Minister Peter Morris argued in the 2001 International Commission on Shipping report “Ships, Slaves and Competition” that certification fraud breaches ships’s security and underlines a pressing need to authenticate the identity of seafarers.⁵ In the same vein the International Labour Organisation adopted a new convention for seafarer identity in the form of a biometric identity document. The aim is to get a universal ID card for seafarers that will be identical throughout the world, easy to verify in a scan and hard to forge.⁶

Advanced hard-to-forge ID on this level might potentially make validating seafarer identity more efficient in the West, where there is an administrative infrastructure and personnel to collate and scan biometric ID. However there are large parts of the world where this is not the case. Many of these under-resourced states supply large proportions of the seafarer population. Assuming an unprecedented and equal level of resource in every administration, so long as every flag state is part of the process it might at first appear that this high-tech measure would eradicate the problem of false certification once and for all. In fact, on the basis of the STW 40/4, 41/4 and 42/4 reports held by the IMO, there is very little evidence that biometric ID will have any effect on the problem of false certification at all.

No evidence was found in this study suggesting that seafarers are by and large not who they claim to be. On the contrary, the issue seems to be that when certificates are falsified it is to conceal the fact that their qualifications and/or experience are not what they seem to be. There is a massive body of evidence notable by its absence that responsibility for this situation lies not with seafarers but with flag state administrations.

Over 90% of IMO signatory states have not report false certificates detected to the IMO, after being specifically and repeatedly asked to do so. Even if the IMO took the unusual step of mandating biometric ID for all its members this would do nothing to address the issue that on the current evidence the real problem is the issuing of bona fide certification on less than genuine

⁵ Michael Richardson, “A Time Bomb For Global Trade.” Institute of Southeast Asian Studies

⁶ *ibid*

supporting evidence. Verifying the evidence behind every granted certificate is the only way to detect this practice. Of itself, verifying the identity of the seafarer does nothing to reveal whether or not he has the experience or qualifications claimed in support of his certification. When CoCs can already be bought for cash there is no reason to believe biometric ID will not also be available if the price is right.

The ITF has several fundamental reservations about the entire concept of seafarer identity cards containing yet more personal information. Who, for example, would be able to input data onto the cards? What would actually be recorded, bearing in mind that there is no shortage of countries and ports where people with different religions or sexuality have a great deal less than equal status. Who would have access to seafarer's tax records, medical records and passport details, as well as their sea service and qualifications?

Biometric ID would certainly put an end to the type of amateur forgery MCA found on one faked CoC, detailing the bearer's "paramilitary and moral perfection." However, the issue of biometric ID fails to address the central problem. Perhaps more damagingly, while failing to improve the security of the validation process it shifts the focus and emphasis onto the individual seafarer rather than the organisations that could alter the situation if they chose to do so.

According to the IMO's own figures the majority of certificates are not forged or altered by seafarers. On the STW evidence the problem of false certification lies squarely with flag states in their unwillingness to report false certification and their lack of effective and comprehensive internal verification procedures. It is hard to see how biometric ID cards or any other device issued by flag state administrations that do not verify their issue can do anything to maintain the integrity and trust that underpins the entire system of certification.
