



From:  COMDT (CG-CVC)

16721
CG-CVC Policy Letter
No. 12-06

OCT 11 2012

To: NMC

Subj: INTERNATIONAL CONVENTION ON STANDARDS OF TRAINING, CERTIFICATION AND WATCHKEEPING FOR SEAFARERS, 1978, AS AMENDED, ENDORSEMENT(S) AS VESSEL PERSONNEL WITH DESIGNATED SECURITY DUTIES AND FOR SECURITY-AWARENESS.

Ref: (a) International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW)
(b) Title 33, Code of Federal Regulations Part 104
(c) Title 46, Code of Federal Regulations Part 11
(d) Title 46, Code of Federal Regulations Part 15

1. PURPOSE. This policy letter provides guidance on the issuance of endorsements under the 2010 amendments to the STCW Convention and Code in reference (a) with respect to the training and certification of Vessel Personnel with Designated Security Duties (VPDSD) and vessel personnel requiring security-awareness training.
2. DIRECTIVES AFFECTED. None.
3. APPLICATION. This guidance applies to personnel on vessels of 500 Gross Tons or more sailing beyond the boundary line established by 46 CFR part 7, except those vessels that have been determined to be otherwise exempt from, or not subject to further obligation of STCW under 46 CFR 15.103(e) and (f). As an option, seafarers (mariners) may comply with section 13 of the International Ship and Port Facility (ISPS) Code instead of Regulation VI/6 of the STCW Convention until January 1, 2014. The Coast Guard has determined that requirements in 33 CFR 104.220 and 104.225 meet the requirements of section 13 of the ISPS Code.
4. BACKGROUND.
 - a. Regulation VI/6 of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978 as amended, (STCW) sets forth minimum requirements for security-related training and instruction for all seafarers. In 2007, the International Maritime Organization (IMO) embarked on a comprehensive review of the entire STCW Convention and STCW Code. The Parties adopted these amendments on June 25, 2010, at the STCW Diplomatic Conference in Manila, Philippines, and the

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amendments entered into force for all ratifying countries on January 1, 2012. Specifically, the 2010 amendments to the STCW Convention and Code include new security-related training and instruction requirements as follows: (1) security familiarization for all persons employed or engaged on board a vessel; (2) security awareness training for personnel without designated security duties; and, (3) specialized training for personnel with designated security duties.

- b. The Convention is not self-implementing; therefore, the U.S., as a signatory to the STCW Convention, must initiate regulatory changes to ensure full implementation of the amendments to the STCW Convention and STCW Code. The U.S. implements these provisions under the Convention and under the authority of United States domestic laws in United States Code, Titles 33 and 46.
- c. The Coast Guard published a Supplemental Notice of Proposed Rulemaking (SNPRM) on August 1, 2011 (76 FR 45908), proposing changes to implement the STCW Convention and Code, to address the comments received from the public in response to the Notice of Proposed Rulemaking (NPRM) published on November 17, 2009 (74 FR 59354), and to incorporate the 2010 amendments to the STCW Convention that came into force on January 1, 2012. The public comment period for the SNPRM ended on September 30, 2011. The Coast Guard intends to publish a final rule to implement amendments to the STCW, including the 2010 amendments, and ensure that the U.S. is meeting its obligations under the Convention.

5. DISCUSSION.

- a. By promulgation of this policy letter, the Coast Guard is not adding requirements to existing policy or regulation. As of January 1, 2012, STCW requires that certain seafarers hold endorsements as: (1) Vessel Personnel with Designated Security Duties (VPDSD); or, (2) evidencing security-awareness training if the mariner is assigned specific security duties. Current domestic regulations substantially comply with the STCW requirements; however, except for Vessel Security Officer (VSO), we do not issue STCW endorsements to document compliance with the domestic security regulations found in reference (c).
- b. The U.S. implements provisions of the STCW Convention and STCW Code under the authority of United States domestic laws in United States Code Titles 5, 14, and 33, the STCW Convention, and pursuant to 46 CFR, Chapter I, Subchapter B.
- c. The security training requirements in the STCW were developed as a progression where “security-awareness” is the lowest level of training and “vessel security officer” (VSO) demands the highest level of training. Under this progression, VSO training meets the requirements for VPDSD, and the VPDSD meets the requirements for security awareness. Therefore, for example, mariners who completed VSO training would be

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eligible for any position with a training requirement at the VSO level or lower. A mariner who meets the requirements for a “superior” endorsement will have their merchant mariner credential (MMC) endorsed for the superior endorsement as well as all subordinate endorsements.

- d. The security requirements for personnel with vessel security duties in 33 CFR 104.220 substantially complies with the STCW requirements for VPDS in STCW VI/6.6-8. The requirements in 33 CFR 104.225 substantially complies with the STCW requirements for security-awareness training in STCW VI/6.4.
- e. The International Maritime Organization (IMO) published Circular STCW.7/Circ.17 in June 2011, advising administrations and port state control authorities that mariners may comply with section 13 of the ISPS Code instead of Regulation VI/6 of the STCW Convention until January 1, 2014.
- f. Coast Guard Procedures:

In order to minimize foreign port state control actions against U.S. vessels subject to STCW, the Coast Guard, in addition to issuing VSO endorsements, will issue STCW endorsements as VPDS and security-awareness training to mariners who meet the requirements of 33 CFR 104.220 or 104.225 as appropriate:

- (1) The Coast Guard will continue to issue STCW endorsements as VSO to mariners meeting the existing requirements in 46 CFR 11.811 and 33 CFR 104.215.
- (2) STCW endorsements as VPDS (STCW A-VI/6.6-8) will be issued to those mariners who apply for an STCW endorsement as VPDS and provide documentary evidence of having met the existing requirements found in 33 CFR 104.220. Alternatively, mariners who commenced sea service prior to January 1, 2012 may apply for an endorsement under this policy by providing documentation attesting to one of the following:
 - (a) seagoing service with designated security duties for a period of six months in total during the preceding three years (designated security duties may include, but are not limited to duties specified in the vessel security plan);
 - (b) performance of security functions considered to be equivalent in scope to shipboard designated security duties, for a period of six months in the preceding three years; or
 - (c) successful completion of a Coast Guard accepted or Coast Guard approved training course.

Documentary evidence may include, but is not limited to a certificate or letter signed by a company official, or a certificate of completion from a Coast Guard accepted or

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Coast Guard approved course.

(3) STCW endorsements evidencing compliance with security-awareness training (A-STCW VI/6.1-4) will be issued to mariners who provide documentary evidence of meeting the existing requirements in 33 CFR 104.225. Alternatively, mariners who commenced sea service prior to January 1, 2012 may apply for an endorsement under this policy by providing documentation attesting to one of the following:

- (a) seagoing service for a period of six months in total during the preceding three years; or
- (b) Successful completion of a Coast Guard accepted or Coast Guard approved training course.

Documentary evidence may include, but is not limited to a certificate or letter signed by a company official, or a certificate of completion from a Coast Guard accepted or Coast Guard approved course.

(4) The Coast Guard will begin approving VPDS courses and security-awareness courses. Information regarding course approval for these courses can be found in enclosure (1) of this policy letter. All previous courses provided under the MARAD/Coast Guard voluntary approval program will remain valid. A list of approved courses may be found on NMC's website at the following address: <http://www.uscg.mil/nmc/>. Information regarding previously approved Maritime Administration (MARAD) security courses may be found on MARAD's website at the following address: <http://www.marad.dot.gov/>. The Coast Guard does not approve VSO courses, they are approved by a Quality Standard System (QSS) organization on behalf of the Coast Guard. All previously approved MARAD VPDS, and security awareness training courses, remain valid.

(5) For the purposes of this interim policy letter, the Coast Guard considers the VPDS and security awareness training endorsements issued to existing mariners, to be modifications of existing credentials. The addition of these endorsements will not change the expiration date of the mariner's MMC unless the applicant renews all endorsements that would appear on the MMC under 46 CFR 10.227.

(6) Consistent with 46 CFR Table 10.219(a), no fees will be charged for STCW endorsements on existing MMCs, unless the mariner is seeking a renewal or raise in grade of their MMC. In that case, the application will be processed as a renewal under 46 CFR 10.227 or processed as a raise in grade under 46 CFR 10.231, and the appropriate fees will be charged.

(7) For the purpose of this interim policy letter, VPDS and security-awareness training endorsements will be considered entry-level ratings and will need to meet the

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applicable medical standards for entry-level ratings consistent with 46 CFR 10.215(e)(2). Mariners holding valid MMCs will be assumed to be medically qualified unless the mariner is seeking a renewal of their existing MMC. Therefore, mariners currently holding a valid MMC need not submit a form 719K/E with their application for one of these endorsements.

g. Mariner Procedures:

- (1) Any seafarer (mariner) working under their STCW endorsement, should obtain an endorsement for security-awareness. Those assigned specific security duties should obtain an endorsement as VPDS.
- (2) Mariners requesting an STCW security endorsement, and, currently holding a MMC who request an STCW security endorsement, and, who do not wish to extend the expiration date beyond that of their current MMC should provide a properly completed Form 719B.
- (3) Mariners who wish to extend the expiration date of their MMC must meet the application requirements found in 46 CFR 10.227.

h. Company and Vessel Operator Procedures: Companies and vessel operators should:

- (1) Ensure that all persons on board (except passengers) receive the security-related familiarization training required by STCW A-VI/6.1-4. Personnel should be able to:
 - (a) Report a security incident, including a piracy or armed robbery threat or attack;
 - (b) Know procedures to follow when they recognize a security threat; and
 - (c) Take part in security-related emergency and contingency procedures.

The security-related familiarization training should be conducted by the VSO or equally qualified person.

- (2) Ensure all seafarers on board without designated security duties hold an STCW endorsement on their MMC evidencing completion of the security-awareness training in accordance with STCW A-VI/6.4-5. Seafarers may sail with a valid course completion certificate while awaiting an official endorsement on their MMC.
- (3) Ensure all mariners with designated security duties have an endorsement on their MMC for VPDS as outlined in STCW A-VI/6.6-9. Seafarers may sail with a valid course completion certificate while awaiting an official endorsement on their MMC.

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(4) Ensure mariners performing duties as a VSO hold a valid endorsement for VSO as specified in 46 CFR 15.1113.

(5) VSO's are encouraged to record the provision of security training in accordance with 33 CFR 104.235(b)(1).

6. ACTION.

- a. All OCMI's and the National Maritime Center (NMC) should be guided by the information in this policy letter.
- b. Commanding Officers of units with marine safety responsibilities should bring this policy letter to the attention of all segments of the maritime industry in their area of responsibility.
- c. This policy is posted along with other CG-CVC policy letters on the Coast Guard's Homeport internet website at <http://homeport.uscg.mil> by selecting the following links: [Library](#) > [Policy](#) > [Policy Letters](#) > Inspection. For more information, contact the NMC Customer Service Center at 1-888-IASKNMC (1-888-427-5662) or iasknmc@uscg.mil.

7. DISCLAIMER. This guidance is not a substitute for applicable legal requirements, nor is it itself a regulation. It is not intended to, nor does it, impose legally-binding requirements on any party. It represents the Coast Guard's current thinking on this topic. You can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach (you are not required to do so), you may contact the Mariner Credentialing Program Policy Division (CG-CVC-4) at (202) 372-2357 or MMCPolicy@uscg.mil.

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Enclosures: (1) Guidance for Interim Course Approval

Copy: All Area/District (p) offices
All Sectors/ Activities and MSU's
National Maritime Center

**GUIDANCE FOR INTERIM APPROVAL OF COURSES FOR MARITIME SECURITY
AWARENESS AND FOR VESSEL PERSONNEL WITH SPECIFIC SECURITY DUTIES**

1. The Coast Guard will consider granting interim approvals to Maritime Security Awareness (MSA) courses and courses for Vessel Personnel with Specific Security Duties (VPSSD).
2. The Coast Guard will continue its policy of not approving Vessel Security Officer courses. As specified in 33 CFR 104.215(d)(iv), these courses must be accepted by a Quality Standards System organization approved by the Coast Guard to accept training on its behalf.
3. Course documentation should be documented and submitted to the Coast Guard as described in Navigation and Vessel Inspection Circular (NVIC) 5-95, *Guidelines for Organizations Offering Coast Guard Approved Courses*, with one exception. Instead of submission to a Regional Examination Center as specified in NVIC 5-95, courses should be submitted to the National Maritime Center at the following address:

U. S. Coast Guard
National Maritime Center (NMC-2)
100 Forbes Drive
Martinsburg, WV 25404

Alternatively, courses may be submitted by e-mail to NMCCourses@uscg.mil.

4. The Coast Guard will grant interim approval to a course meeting the guidelines described below. The course will be subject to re-evaluation when relevant regulations are published. In the event the interim approved course is found to need revision in order to meet new regulations or policy, the training provider will be provided a reasonable period in which to make the needed revisions. The interim approval will remain in effect during this period.
5. Mariners who completed a course holding an interim approval will not be required to repeat or supplement their training, even if the course is subsequently revised as described above.
6. VPSSD courses should be substantially similar to IMO Model Course 3.26, *Security Training for Seafarers with Designated Security Duties*.
7. MSA courses should be substantially similar to IMO Model Course 3.27, *Security Awareness Training for All Seafarers*.