

Commandant
United States Coast Guard

2703 Martin Luther King Jr. Ave SE Stop 7509 Washington, DC 20593-7509 Staff Symbol: CG-MMC-2 Phone: (202) 372-2357 Fax: (202) 372-4908

16721 CG-MMC Policy Letter No. 03-21

August 18, 2021

E-Mail: MMCPolicy@uscg.mil

From: M. Medina

COMDT (CG-MMC)

To: National Maritime Center

Subj: ISSUANCE OF ENDORSEMENTS FOR MASTER OF SELF-PROPELLED VESSELS OF LESS THAN 100 GRT TO MARINERS HOLDING ENDORSEMENTS AS MATE OF SELF-PROPELLED VESSELS OF 200 GRT OR MORE

- 1. <u>PURPOSE</u>. This policy letter provides guidance for the issuance of a national officer endorsement for master of self-propelled vessels of less than 100 GRT for mariners who hold national endorsements as mate of inspected self-propelled vessels of 200 GRT or more.
- 2. <u>ACTION</u>. The Coast Guard will use this policy to evaluate whether mariners may be issued an endorsement for master of self-propelled vessels of less than 100 GRT.
- 3. DIRECTIVES AFFECTED. None.

4. BACKGROUND.

- a. As is specified in 46 CFR 15.901(a), an individual holding a merchant mariner credential (MMC) endorsed as mate or pilot of inspected self-propelled vessels of 200 gross registered tons (GRT) or more is authorized to serve as master on inspected self-propelled vessels of less than 100 GRT within any restrictions on the MMC, without further endorsement.
- b. The Coast Guard is aware that there is confusion amongst mariners and the maritime industry concerning the authority of a mariner holding a national endorsement for mate authorizing service on inspected self-propelled vessels of 200 GRT or more to serve as a master on a vessel of less than 100 GRT. In accordance with this policy, the Coast Guard will issue endorsements as master of self-propelled vessels of less than 100 GRT to mariners holding an endorsement that authorizes service as a mate on an inspected vessel of 200 GRT or more.

bj: ISSUANCE OF ENDORSEMENTS FOR MASTER OF SELF-PROPELLED VESSELS OF LESS THAN 100 GRT TO MARINERS HOLDING ENDORSEMENTS AS MATE OF SELF-PROPELLED VESSELS OF 200 GRT OR MORE 16742 CG-MMC Policy Letter No. 03-21

5. <u>DISCUSSION</u>.

- a. Mariners holding an MMC endorsement that authorizes service as mate on inspected self-propelled vessels of 200 GRT or more, are not required to have the endorsement as master in their MMC in order to serve as master on an inspected vessel of less than 100 GRT. With this policy the Coast Guard may issue a national MMC endorsement as master of self-propelled vessels of less than 100 GRT if they hold any of the following national endorsements:
 - 1) Chief Mate of Self-Propelled Vessels of Unlimited Tonnage;
 - 2) Second Mate of Self-Propelled Vessels of Unlimited Tonnage;
 - 3) Third Mate of Self-Propelled Vessels of Unlimited Tonnage;
 - 4) Mate of Self-Propelled Vessels of Less Than 1,600 GRT;
 - 5) Mate of Self-Propelled Vessels of Less Than 500 GRT;
 - 6) Chief Mate (OSV);
 - 7) Mate (OSV); and
 - 8) Mate (Pilot) of Towing Vessels.
- b. Mariners seeking to add the master less than 100 GRT endorsement to their MMC, must submit an application to the Coast Guard to add the endorsement to their credential.
- c. Mariners holding one of the endorsements listed in paragraph 5.a above authorizing service on either near-coastal waters or oceans will be issued an endorsement as Master of Near-Coastal Self-Propelled Vessels of Less Than 100 GRT. Mariners holding one of the endorsements listed in paragraph 5.a above for inland waters or for Great Lakes and inland waters will be issued a master less than 100 GRT endorsement with the same route as their mate endorsement.
- d. An examination is not required to add the endorsement for Master of Self-Propelled Vessels of Less Than 100 GRT for the same route as the mariner's endorsement for mate.
- e. Mariners holding endorsements as Chief Mate (OSV) and Mate (OSV) will be issued endorsements as master of less than 100 GRT that are not restricted to offshore supply vessels. Mariners holding endorsements as Mate (Pilot) of Towing Vessels will be issued endorsements as master of less than 100 GRT that are not restricted to towing vessels.
- f. All restrictions on the mariner's mate endorsement, other than those discussed above, will also apply to the endorsement for master of less than 100 GRT. For example, if a mariner holds an endorsement as Mate of Inland Self-Propelled Vessels of Less Than 500 GRT with a restriction to waters where the International Regulations for Preventing Collisions at

Subj: ISSUANCE OF ENDORSEMENTS FOR MASTER OF SELF-PROPELLED VESSELS OF LESS THAN 100 GRT TO MARINERS HOLDING ENDORSEMENTS AS MATE OF SELF-PROPELLED VESSELS OF 200 GRT OR MORE 16742 CG-MMC Policy Letter No. 03-21

Sea (COLREGs) do not apply, the mariner's master endorsement will have the same restriction to inland waters where the COLREGs do not apply.

- g. In order to serve as master of near coastal vessels of less than 100 GRT on international voyages beyond the boundary line described in 46 CFR Part 7, mariners will also need to hold an STCW endorsement for master (46 CFR 15.1103). Information on qualifying for an STCW endorsement as Master of Vessels of Less than 500 GT Limited to Near-Coastal Waters is contained in 46 CFR 11.317 and Navigation and Vessel Inspection Circular (NVIC) 13-14.
- 6. <u>DISCLAIMER</u>. 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. This guidance represents the Coast Guard's current thinking on this topic and may assist industry, mariners, the general public, and the Coast Guard, as well as other Federal and State regulators, in applying statutory and regulatory requirements. Alternative approaches for fulfilling this policy may be acceptable if the approach satisfies the requirements of the applicable statutes and regulations.

7. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.

- a. The development of this guidance and the general policies contained within it have been thoroughly reviewed under Department of Homeland Security Directive 023-01, Rev.1, associated implementing instructions, and Environmental Planning COMDTINST 5090.1 (series), which guide the Coast Guard in complying with the National Environmental Policy Act of 1969 (42 U.S.C. 4321-4370f) by the originating office, and are categorically excluded (CE) from further environmental analysis under paragraph #A3 in Appendix A, of Table 1 of DHS Directive Instruction Manual 023-01, Rev. 1. Because this guidance implements, without substantive change, the applicable Commandant Instruction or other federal agency regulations, procedures, manuals, and other guidance documents, Coast Guard categorical exclusion #A3 is appropriate.
- b. This guidance will not have any of the following: significant cumulative impacts on the human environment; substantial controversy or substantial change to existing environmental conditions; or inconsistencies with any Federal, State, or local laws or administrative determinations relating to the environment. All future specific actions resulting from the general policies in this guidance must be individually evaluated for compliance with the National Environmental Policy Act (NEPA), DHS and Coast Guard NEPA policy, and compliance with all other environmental mandates.
- 8. <u>REQUEST FOR CHANGES</u>. All requests for changes and questions regarding implementation of this policy and/or requests for changes should be directed to the Office of Merchant Mariner Credentialing (CG-MMC), at (202) 372-2357 or MMCPolicy@uscg.mil.