




16742
CG-MMC Policy Letter
No. 02-21
August 5, 2021

From: M. Medina 
COMDT (CG-MMC)

To: Distribution

Subj: GUIDANCE ON VOLUNTARY COMPLIANCE WITH TRAINING
REQUIREMENTS FOR PERSONNEL SERVING ON U.S.-FLAGGED PASSENGER
SHIPS THAT CARRY MORE THAN 12 PASSENGERS ON INTERNATIONAL
VOYAGES

Ref: (a) International Convention on Standards of Training, Certification and Watchkeeping
for Seafarers, 1978, as amended (STCW Convention)
(b) Seafarers' Training, Certification and Watchkeeping Code, as amended (STCW
Code)
(c) 46 Code of Federal Regulations (CFR) Part 11 Subpart K- Officers on a Passenger
Ship When on an International Voyage
(d) 46 CFR Part 12 Subpart I- Crewmembers on a Passenger Ship on an International
Voyage

1. PURPOSE. This policy letter advises U.S. passenger vessel owners and operators of the 2016 amendments to references (a) and (b). Passenger ships on international voyages may be subject to detentions in foreign ports if personnel have not received appropriate training in accordance with references (a) and (b), and the current U.S. regulations in references (c) and (d). As defined in 46 CFR 11.1103, passenger ships are those vessels that carry more than 12 passengers on international voyages.
2. DIRECTIVES AFFECTED. None.
3. BACKGROUND.
 - a. The International Maritime Organization (IMO) establishes the minimum international standards of competence including training requirements for mariners and maritime personnel through references (a) and (b). The STCW Convention and the STCW Code require specialized training for officers and ratings on passenger vessels.
 - b. On January 13, 2012, the *Costa Concordia*, an Italian passenger vessel cruising in the Mediterranean Sea, struck a reef resulting in a breach of the hull, causing the vessel to flood and capsize leading to the loss of 32 lives (including two United States citizens), injury to 157 others on board, and a total loss of the vessel. Investigation reports for the incident concluded multiple factors contributed to the loss of life and injuries, including delayed management of the emergency and evacuation process, inconsistencies in the assignment of emergency duties, and communication issues due to the different backgrounds of crewmembers.

Subj: GUIDANCE ON VOLUNTARY COMPLIANCE WITH TRAINING 16742
REQUIREMENTS FOR PERSONNEL SERVING ON U.S.- CG-MMC-Policy Letter
FLAGGED PASSENGER SHIPS THAT CARRY MORE THAN 12 No. 02-21
PASSENGERS ON INTERNATIONAL VOYAGES

- c. Following the loss of the *Costa Concordia*, the IMO reviewed existing passenger vessel safety training provisions and examined passenger vessel emergency practices to identify areas of the STCW Convention and the STCW Code that merit amendment considering the ever-expanding passenger vessel industry.
- d. In 2014, the IMO's Sub-Committee on Human Element, Training and Watchkeeping (HTW) developed amendments to the STCW Convention and the STCW Code expanding training requirements for personnel on passenger vessels.
- e. In 2016, the IMO adopted amendments to the STCW Convention and the STCW Code expanding the training requirements for personnel on passenger vessels. These amendments entered into force on July 1, 2018.

4. DISCUSSION.

- a. This policy letter advises vessel owners and operators of the 2016 amendments to references (a) and (b), which added training requirements for personnel on passenger vessels. Details on these trainings follows below.

(i) *Passenger Ship Emergency Familiarization.* The 2016 amendments to reference (a), Regulation V/2, requires all personnel serving on board passenger vessels to complete passenger ship emergency familiarization appropriate to their capacity, duties, and responsibilities before being assigned shipboard duties, as specified in section A-V/2, paragraph 1 of reference (b). This training will not require Coast Guard approval in accordance with 46 CFR part 10, subpart D, and can be conducted on board the vessel or at a shore-based location. Mariners or vessel operators should maintain documentation verifying that personnel have completed the Passenger Ship Emergency Familiarization training.

(ii) *Crowd Management Training.* The 2016 amendments to reference (a), Regulation V/2 requires all mariners endorsed with qualified ratings on a vessel to complete Crowd Management training as specified in section A-V/2, paragraph 3 of reference (b), expanding the requirement from personnel designated on the muster list to assist passengers in emergency situations. This training must be Coast Guard approved in accordance with 46 CFR 10.402(a).

- b. Passenger vessels may be subject to foreign port state control enforcement if mariners or vessel operators do not have documentation that personnel have completed the training contained in paragraphs a. (i) and a. (ii).

5. ACTION.

- a. All OCMI's shall be guided by the information in this policy letter. The Office of Commercial Vessel Compliance (CG-CVC) shall ensure Commanding Officers of units with marine safety responsibilities bring this policy letter to the attention of the maritime industry in their AOR.

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REQUIREMENTS FOR PERSONNEL SERVING ON U.S.- CG-MMC-Policy Letter
FLAGGED PASSENGER SHIPS THAT CARRY MORE THAN 12 No. 02-21
PASSENGERS ON INTERNATIONAL VOYAGES

b. No paper distribution will be made of this policy letter. An electronic version will be located at https://www.dco.uscg.mil/Our-Organization/Assistant-Commandant-for-Prevention-Policy-CG-5P/National-Maritime-Center-NMC/policy_regulations/.

6. **DISCLAIMER.** This policy letter is not a substitute for applicable legal requirements, nor is it, in itself, a regulation. It is not intended to nor does it impose legally-binding requirements on any party. This policy letter 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 policy letter 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, which has determined that this action is one of a category of actions that do not individually or cumulatively have a significant effect on the human environment.

b. This policy letter is categorically excluded under paragraph A3 of Appendix A, of Table 1 of DHS Directive Instruction Manual 023-01, Rev. 1. Paragraph A3 pertains to the promulgation of rules, issuance of rulings or interpretations, and the development of and publication of policies, orders, directives, notices, procedures, manuals, advisory circulars, and other guidance documents of the following nature: (a) Those of a strictly administrative or procedural nature; (b) those that implement, without substantive change statutory or regulatory requirements; (c) those that implement, without substantive change, procedures, manuals and other guidance documents; (d) those that interpret or amend an existing regulation without changing its environmental effect; (e) technical guidance on safety or security matters; or (f) guidance for the preparation of security plans. This policy letter provides guidance to ensure that personnel serving on U.S.-flagged passenger ships that carry more than 12 passengers on international voyages receive appropriate training as required by the STCW Convention and the STCW Code. This action is consistent with our categorical exclusion at paragraph A3 of the DHS Instruction.

c. This policy letter 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.

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16742
CG-MMC-Policy Letter
No. 02-21

8. QUESTIONS. Questions or concerns regarding implementation of this policy letter 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.

Distribution: All Sectors
Office of Commercial Vessel Compliance (CG-CVC)

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