DEPARTMENT OF TRANSPORTATION UNITED STATES COAST GUARD

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NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 3-83

Subj: Voluntary Qualifications for U.S. Merchant Marine Entry Ratings.

- 1. <u>PURPOSE</u>. The purpose of this Circular is to recommend adoption by the maritime industry of voluntary measures which pertain to the qualifications of individuals upon original entry into the U.S. merchant marine.
- 2. <u>DIRECTIVES AFFECTED</u>. These policy changes will be included in a future revision to Chapters 51 and 52 of the Marine Safety Manual, (CI M 16000.3 (old CG-495)).
- 3. <u>BACKGROUND</u>. Pursuant to 46 U.S.C. 643 and 672, as implemented by the regulations in Part 12 of Title 46 of the Code of Federal Regulations, merchant seamen are issued upon proper application, a Certificate of Identification (U.S. Merchant Mariner's Document). These documents authorize service as ordinary seaman, wiper, and/or steward's department, e.g. entry rating(s). The statute neither requires nor authorizes the Coast Guard to establish any standards of previous job training or physical qualification.

4. DISCUSSION.

- a. Although the Coast Guard has no statutory authority to require prior training or physical examinations for individuals applying for entry ratings, we recognize the importance of having these individuals meet certain minimum qualifications. Seafarers who are not at least minimally qualified may endanger themselves, their fellow crewmembers, and their vessel.
- b. The National Transportation Safety Board (NTSB) has noted in their investigations the difficulty individuals with weight control or other physical problems have had during emergency situations. During the past four years, the Seafarer's Health Improvement Program (SHIP) has been developing detailed physical standards to ensure personnel are physically qualified to be employed on U.S. merchant vessels. SHIP is an organization consisting of members from all areas of the maritime community with whom government observers meet occasionally, who are concerned with the health of U.S. merchant vessel personnel. They have recently completed and adopted comprehensive physical standards for individuals entering the U.S. merchant marine. These standards have been developed with valuable input from medical professionals familiar with the unique work place environment of merchant vessels. The physical examination standards, as developed by SHIP, will be published as an appendix to "The Ships Medicine Chest and Medical Aid at Sea" which is published by the U.S. Public Health Service.
- c. Besides being physically qualified, the Coast Guard also believes that entry rating personnel should have minimum training prior to being assigned to a vessel. Every person

aboard has a vital role in controlling an emergency situation especially when a vessel is miles from the nearest outside aid. If an emergency occurs aboard a vessel at sea a seafarer can not just walk to safety and wait for the local emergency squad to handle the situation. The seafarer is the emergency squad and he or she must be able to survive at sea.

- d. This basic training for entry rating personnel should include personal survival techniques and firefighting. Training should be on a level suited for entry rating personnel and may consist of only one or two days. Personal survival techniques should include but are not limited to:
 - -action to be taken in emergency situations such as collision, fire, and foundering
 - -types of life-saving appliances
 - -preparation and drills for emergencies
 - -location of life preservers and fire alarm controls
 - -action to be taken at lifeboat stations
 - -abandon ship procedures
 - -action to be taken entering and aboard a lifeboat or liferaft
 - -general principles of survival at sea
- e. It is feasible that a physically qualified ordinary seaman with this basic indoctrination training could, with additional lookout procedure training, substitute for an Able Seaman in certain shipboard situations. Therefore, the possibility exists that a vessel's Certificate of Inspection could be amended to allow substitution of such specially trained ordinary seaman for Able Seaman. Any decision to allow substitution of specially trained ordinary seaman for Able Seaman rests with the Officer in Charge, Marine Inspection (OCMI). As explained in 46 U.S.C. 672, under no circumstances can the percentage of Able Seaman required on board drop below 65%.
- f. In order to provide maximum effectiveness of the training entry rating personnel have received ashore, masters are encouraged to conduct realistic shipboard emergency drills. This can be accomplished by ensuring personnel move quickly but safely during all drills, that they are familiar with their drill duties and station before the drill, and that all equipment that would be used during an actual emergency is "broken out." Additionally, a critique with all crew-members after the drill is a very effective way of instructing personnel, obtaining feedback, and clearing up problem areas which could be fatal in a real emergency. This critique is not intended to replace, but only supplement, the periodic safety meetings conducted by the master with the crew.

5. <u>ACTION</u>

- a. The Coast Guard strongly recommends that organizations or individuals in the position of hiring personnel who are seeking initial employment on U.S. merchant vessels, voluntarily adopt the SHIP physical examination standards for original entry into the U.S. merchant marine. These standards are appended to "The Ship's Medicine Chest and Medical Aid at Sea."
- b. All Regional Examination Centers are directed to continuously encourage the maritime community to utilize the SHIP physical examination standards for all personnel upon original entry into the U.S. merchant marine.

- c. Vessel owners and operators who desire to substitute ordinary seaman physically qualified and trained in basic indoctrination and lookout procedures for Able Seaman must make application for an amendment to their Certificate of Inspection as presently required by 46 CFR 157.15-5(a).
- d. OCMIs may at their discretion and in accordance with 46 CFR 157.15-1(b), issue an amendment to the Certificate of Inspection allowing for the substitution of ordinary seaman physically qualified and trained in basic indoctrination and lookout procedures for Able Seaman. The Certificate of Inspection will not be amended to allow less than 65% Able Seaman.
- e. Entry rating personnel receiving this basic indoctrination in personal survival techniques and firefighting should be issued a qualification letter from their employer stating that they completed such training. If an ordinary seaman receives additional lookout procedure training this fact should be noted in his qualification letter. When ordinary seamen are substituted for Able Seamen as allowed by an amended Certificate of Inspection they should carry the qualification letter with them while serving aboard the vessel.

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