

Commandant United States Coast Guard

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COMDTCHANGENOTE 16721 NVIC 21-14 29 OCT 2021

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 21-14, CH-1

Subj: CHANGE 1 TO GUIDELINES FOR QUALIFICATION FOR STCW ENDORSEMENTS FOR VESSEL SECURITY OFFICERS, VESSEL PERSONNEL WITH DESIGNATED SECURITY DUTIES, AND SECURITY AWARENESS

Ref: (a) Guidelines for Qualification for STCW Endorsements for Vessel Security Officers, Vessel Personnel with Designated Security Duties, and Security Awareness, NVIC 21-14, COMDTPUB 16721

- 1. PURPOSE. This Commandant Change Notice publishes CH-1 to NVIC 21-14.
- 2. ACTION. The Coast Guard will use this NVIC and Title 46 Code of Federal Regulations (CFR) 11.337, 12.625, and 12.627 to determine if mariners are qualified for STCW endorsements as Vessel Security Officer (VSO), Vessel Personnel with Designated Security Duties (VPDSD), and for Security Awareness (SA).
- 3. <u>DIRECTIVES AFFECTED</u>. With the release of this Commandant Change Notice, NVIC 21-14 is updated.

4. DISCUSSION.

Α В С D Ε F G Н a. After publication of reference (a), the Coast Guard became aware of the need to address the question of whether sea service acquired on military and government-owned or operated vessels should be allowed to be used to qualify for a STCW endorsement as VSO. This change notice revises NVIC 21-14 to indicate that the Coast Guard has determined sea service accrued aboard certain military and government owned or operated vessels may be credited toward the sea service requirements in 33 CFR 104.215(d)(1)(v)(A) and 104.215(d)(1)(v)(B) to qualify for a STCW endorsement as VSO.

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NON-STANDARD DISTRIBUTION:

- b. The regulations at 46 CFR 10.232(d)(1) allow the use of military service towards credentials when the Coast Guard determines it is equivalent to sea service acquired on merchant vessels. Additionally, many government owned and operated vessels are operated similarly to a merchant vessel. The purpose of the sea service requirements for a STCW endorsement as VSO is to ensure that the mariner is familiar with general merchant vessel operations. The Coast Guard has determined that sea service onboard certain government owned or government operated vessels of at least 100 GRT counts toward the sea service requirements in 33 CFR 104.215(d)(1)(v)(A) and 104.215(d)(1)(v)(B) as it achieves familiarity with merchant vessel operations. Additionally, the Coast Guard has determined that by combining (1) up to 5 months of military sea service, (2) 30 days minimum sea service on government owned or operated vessels of 100 GRT or on vessels subject to 33 CFR 104.105, and (3) the knowledge requirements in 33 CFR 104.215, the mariner can demonstrate the necessary operational experience to qualify for the VSO endorsement under 33 CFR 104.215(d)(1)(v)(B).
- c. This policy supports the intent of 10 U.S.C. 2015 and Executive Order 13860 of March 4, 2019, Supporting the Transition of Active Duty Service Members and Military Veterans Into the Merchant Marine, by supporting practices that ensure that members of the United States Armed Forces receive appropriate credit for their military training and experience toward merchant mariner credentialing requirements.
- 5. <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. It represents the Coast Guard's current thinking on this topic and is issued for guidance purposes to outline methods of best practice for compliance with applicable law. You can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations.
- 6. <u>MAJOR CHANGES</u>. This Commandant Change Notice revises Enclosure (1), to NVIC 21-14, to allow the acceptance of sea service aboard certain military and government—owned or operated vessels to be credited toward meeting the qualification requirements for STCW VSO endorsements.

7. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.

- a. The development of this Commandant Change Notice and the general policies contained within it have been thoroughly reviewed under Department of Homeland Security Directive 023-01 and Environmental Planning COMDTINST 5090.1 (series) by the originating office, and are categorically excluded (CE) from further environmental analysis under paragraph #A3 in Table 3-1 of U.S. Coast Guard Environmental Planning Implementing Procedures 5090.1. Because this Commandant Change Notice 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 Commandant Change Notice 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 Commandant Change Notice 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>DISTRIBUTION</u>. No paper distribution will be made of this Commandant Change Notice. An electronic version will be located at https://www.dco.useg.mil/Our-Organization/NVIC/.
- 9. PROCEDURE. Remove and insert the following pages of NVIC 21-14:

<u>Remove</u> <u>Insert</u>

Enclosure (1) Enclosure (1), CH-1

- 10. <u>RECORDS MANAGEMENT CONSIDERATIONS</u>. This Commandant Change Notice has been thoroughly reviewed during the directives clearance process, and it has been determined there are no further records scheduling requirements, in accordance with the Federal Records Act (44 U.S.C. 3101 et seq.), NARA requirements, and the Information and Life Cycle Management Manual, COMDTINST M5212.12 (series). This policy does not create significant or substantial change to existing records management requirements.
- 11. FORMS/REPORTS. None.
- 12. <u>REQUEST FOR CHANGES</u>. All requests for changes or questions regarding implementation of Reference (a) and this Commandant Change Notice should be directed to the Mariner Credentialing Program Policy Division (CG-MMC-2), at (202) 372-2357 or <u>MMCPolicy@uscg.mil</u>. To obtain approval for a SA or VPDSD course, please contact the National Maritime Center at (888) 427-5662 or <u>IAskNMC@uscg.mil</u>.

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COMDTPUB P16700.4 NVIC 21-14 August 25, 2014

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 21-14

Subj: GUIDELINES FOR OUALIFICATION FOR STCW ENDORSEMENTS FOR VESSEL SECURITY OFFICERS, VESSEL PERSONNEL WITH DESIGNATED SECURITY **DUTIES, AND SECURITY AWARENESS**

Ref: (a) International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW)

- 1. PURPOSE. This Navigation and Vessel Inspection Circular (NVIC) provides guidance on qualification for STCW endorsements for Vessel Security Officer (VSO), Vessel Personnel with Designated Security Duties (VPDSD), and Security Awareness (SA).
- 2. ACTION. The Coast Guard will use this NVIC and 46 Code of Federal Regulations (CFR) 11.337, 12.625, and 12.627 to determine if mariners are qualified for STCW endorsements for VSO, VPDSD, and SA. Officers in Charge, Marine Inspection (OCMIs) should bring this NVIC to the attention of the maritime industry within their zones of responsibility. This NVIC is available on the World Wide Web at http://www.uscg.mil/hq/g-m/nvic/. The Coast Guard will distribute it by electronic means only.
- 3. DIRECTIVES AFFECTED. CG-CVC Policy Letter 12-06, 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, is cancelled.

4. BACKGROUND.

a. Regulation VI/6 of reference (a) sets forth minimum requirements for security-related training and instruction for seafarers.

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- b. In 2009, the Coast Guard added a regulation in 46 CFR 15.1113(a) that requires a person serving as VSO on a seagoing vessel to hold a VSO endorsement.
- c. The International Maritime Organization (IMO) amended the STCW Convention and STCW Code on June 25, 2010. These amendments entered into force for all ratifying countries on January 1, 2012. Specifically, the 2010 amendments to the STCW Convention and Code added security-related endorsements for VPDSD, and for SA.
- d. The Coast Guard published a final rule on December 24, 2013, (78 FR 77796) that implements reference (a), including the 2010 amendments. That rule includes provisions for the STCW security endorsements. This rule became effective on March 24, 2014. The Coast Guard is publishing this NVIC to provide guidance on complying with the new regulations.

5. DISCUSSION.

- a. The STCW requires that certain seafarers hold endorsements as VSO, VPDSD, or SA depending on the scope of their shipboard security duties. The 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 International Ship and Port Facility Security Code (ISPS Code) instead of Regulation VI/6 of the STCW Convention until January 1, 2014. Recognizing the challenges of ensuring that mariners will hold the endorsements by this date, the IMO has promulgated a circular STCW.7/Circ.21, advising port state control officers, recognized organizations and recognized security organizations that until July 1, 2015, even if a seafarer does not hold an endorsement for security awareness training or for seafarers with designated security duties, it would be sufficient to accept compliance with Section 13 of the International Ship and Port Facility Security (ISPS) Code, Part A. With a free public account, Circular STCW.7/Circ.21 can be accessed online at http://www.imo.org/OurWork/Circulars/Pages/IMODOCS.aspx > Circulars > STCW > STCW.7. After that date, pursuant to Circular STCW.7/Circ.17, mariners on vessels of 500 gross tons or more sailing beyond the boundary line established by 46 CFR Part 7 must hold the STCW endorsement appropriate for their shipboard security duties, except mariners serving on vessels that have been determined to be otherwise exempt from, or not subject to, further requirements of STCW under 46 CFR 15.105(f) and (g).
- b. In addition to the endorsement requirements for vessel personnel, all contractors, whether part-time, full-time, temporary, or permanent, must have knowledge of the requirements in 33 CFR 104.225, through training or equivalent job experience. Vessel owners and operators must maintain records documenting this requirement and produce those records to the Coast Guard upon request (46 CFR 15.1113(f)).
- 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 eligible for any position with a training requirement at the VSO level or lower. A mariner who meets the requirements for a "superior" security endorsement will have their merchant mariner credential (MMC) endorsed for the superior endorsement as well as all subordinate endorsements.
- d. This NVIC establishes the policy regarding VSO, VPDSD, and SA. Enclosure (1) discusses specific requirements for security endorsements, Enclosure (2) provides guidance on approval of courses leading to security endorsements. Enclosure (3) contains relevant excerpts from the STCW Convention and STCW Code, these are provided for information only.
- 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. It represents the Coast Guard's current thinking on this topic and is issued for guidance purposes to outline methods of best practice for compliance to the applicable law. You can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations.

7. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.

- a. The development of this NVIC and the general policies contained within it have been thoroughly reviewed by the originating office, and are categorically excluded (CE) under current USCG CE # 33 from further environmental analysis, in accordance with Section 2.B.2. and Figure 2-1 of the National Environmental Policy Act Implementing Procedures and Policy for Considering Environmental Impacts, COMDTINST M16475.1 D. Because this NVIC implements, without substantive change, the applicable Commandant Instruction or other federal agency regulations, procedures, manuals, and other guidance documents, Coast Guard categorical exclusion #33 is appropriate.
- b. This NVIC 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.
- 8. <u>RECORDS MANAGEMENT CONSIDERATIONS</u>. This NVIC has been thoroughly reviewed during the directives clearance process, and it has been determined there are no further records scheduling requirements, in accordance with the Federal Records Act, Title 44 United States Code (U.S.C.) 3101 et seq., National Archives and Record Administration requirements, and the Information and Life Cycle Management Manual, COMDTINST M5212.12 (series). This policy does not create a significant or substantial change to existing records management requirements.

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 21-14

9. <u>QUESTIONS</u>. All questions regarding implementation of this Circular should be directed to the Mariner Credentialing Program Policy Division (CG-CVC-4) at (202) 372-2357 or <u>MMCPolicy@uscg.mil</u>. To obtain approval for a SA or VPDSD course, please contact the National Maritime Center at (888) 427-5662 or <u>IAskNMC@uscg.mil</u>.

P. F. THOMAS

Rear Admiral, U. S. Coast Guard

Assistant Commandant for Prevention Policy

Encl: (1) Discussion of Qualification Requirements for STCW Security Endorsements

- (2) Guidance for Approval and/or Acceptance of Courses
- (3) Excerpts from the STCW Convention and STCW Code

DISCUSSION OF QUALIFICATION REQUIREMENTS FOR STCW SECURITY ENDORSEMENTS

1. <u>GENERAL</u>. This enclosure provides guidance for mariners to qualify for International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW) endorsements for Vessel Security Officer (VSO), Vessel Personnel with Designated Security Duties (VPDSD), and Security Awareness (SA).

2. QUALIFICATION REQUIREMENTS FOR VSO ENDORSEMENTS.

- a. As specified in 33 CFR 104.215(d), to qualify for a VSO endorsement, a mariner must:
 - 1) Be at least 18 years of age;
 - 2) Be able to speak and understand the English language as would be relevant to the duties of a VSO;
 - 3) Hold any valid Coast Guard-issued credential;
 - 4) Complete a Coast Guard accepted or Coast Guard approved VSO course; and
 - 5) Meet one of the following sea service requirements:
 - i) Not less than 12 months; or,
 - ii) Not less than 6 months and have knowledge of vessel operations as described in paragraph 2.b. below.
 - 6) Meet the physical examination requirements in 46 CFR part 10, subpart C (as required by 46 CFR 11.337(b)).
- b. Additional guidance on sea service and knowledge requirements.
 - 1) Acceptable sea service for paragraph 2.a (5) above, includes service in any capacity on the following types of vessels, which are subject to 33 CFR 104.105:
 - i) Mobile Offshore Drilling Unit (MODU), cargo, or passenger vessel subject to the International Convention for Safety of Life at Sea, 1974, (SOLAS), Chapter XI-1 or Chapter XI-2;
 - ii) Foreign cargo vessel greater than 100 gross register tons (GRT);
 - iii) Self-propelled U.S. cargo vessel greater than 100 GRT subject to 46 CFR Chapter I, Subchapter I, except commercial fishing vessels inspected under 46 CFR Part 105:
 - iv) Vessel subject to 46 CFR Chapter I, Subchapter L;
 - v) Passenger vessel subject to 46 CFR Chapter I, Subchapter H;
 - vi) Passenger vessel certificated to carry more than 150 passengers;

- vii) Other passenger vessel carrying more than 12 passengers, including at least one passenger-for-hire, that is engaged on an international voyage;
- viii) Barge subject to 46 CFR Chapter I, Subchapters D or O;
- ix) Barge carrying certain dangerous cargo in bulk or barge that is subject to 46 CFR Chapter I, Subchapter I that is engaged on an international voyage.
- x) Tankship subject to 46 CFR Chapter I, Subchapters D or O; and
- xi) Towing vessel greater than 8 meters in registered length that is engaged in towing a barge or barges subject to 33 CFR Part 104, except a towing vessel that temporarily assists another vessel engaged in towing a barge or barges subject to 33 CFR Part 104; shifts a barge or barges subject to this part at a facility or within a fleeting facility; assists sections of a tow through a lock; or provides emergency assistance.
- 2) The Coast Guard will accept service on certain government owned or operated vessels of at least 100 GRT as meeting the sea service requirement in 33 CFR 104.215(d)(1)(v)(A) and 104.215(d)(1)(v)(B).
 - i) Qualifying vessels include:
 - a) Military Sealift Command non-commissioned vessels (designated USNS);
 - b) USACE vessels; and
 - c) NOAA vessels.
 - ii) To be credited, service must be on vessels of at least 100 GRT. While some of these vessels are not subject to 33 CFR 104.105, these vessels are operated similarly to a merchant vessels.
 - iii) Service will be calculated in accordance with 46 CFR 10.232 but will be considered to have been incurred while on a vessel subject to 33 CFR 104.105.
- 3) The Coast Guard will accept limited service on commissioned military vessels of at least 100 GRT counts toward the sea service requirements in 33 CFR 104.215(d)(1)(v)(B). The following applies to credible sea service on commissioned military vessels:
 - i) Qualifying vessels include commissioned:
 - a. U.S. Coast Guard cutters;
 - b. U.S. Army vessels; and;
 - c. U.S. Navy vessels (designated USS)
 - ii) The Coast Guard will accept a maximum of five months service on commissioned military vessels of at least 100 GRT towards the service requirements in 33 CFR 104.215(d)(3)(B).
 - iii) Service will be calculated in accordance with 46 CFR 10.232.

- iv) In addition to demonstrating knowledge of vessel operations, applicants must have at least 30 days service:
 - a. on a vessel subject to 33 CFR 104.105; or
 - b. on government owned or operated vessels as described in paragraph b.2. above.
- 4) Mariners who hold any officer endorsement under 46 CFR Part 11, Subpart B for service on vessels of more than 100 GRT will be considered to meet the requirement for knowledge of vessel operations in paragraph (5)(ii) above. Other mariners must provide evidence of knowledge of vessel operations in the below areas specified in 33 CFR 104.215(d)(3). The knowledge of vessel operations training or equivalent job experience may be documented on agency, company, or vessel letterhead.
 - i) Basic vessel layout and construction:
 - Understanding layout, including decks, rooms, and space numbering; and
 - Understanding of various vessel types; and working knowledge of nautical terms and definitions, especially those used to describe areas and parts of a vessel.
 - ii) Shipboard organization:
 - Familiarity with the various departments and related functions; and
 - Familiarity with the titles used for personnel, the roles and responsibilities of these persons, and the chain of command.
 - iii) Shipboard safety:
 - Understanding of the importance of creating and maintaining safe working and living conditions for passengers and crew alike;
 - Understanding general shipboard safety rules, emergency alarms and signals, and responses to and reporting of accidents;
 - Proper usage of lifesaving equipment and where such equipment is normally stowed aboard various vessel types;
 - Understanding of the operating principles of and proper use of watertight and fire screen doors; and
 - Understanding where it is safe to smoke and not safe to smoke on board and in port.
 - iv) Protection of the marine environment:
 - Understanding of vessel personnel's responsibility to preserve the marine environment; and
 - Basic working knowledge of pollution prevention regulations and techniques.

v) Familiarity with key definitions, terminology, and operational practices employed in the maritime industry.

3. QUALIFICATION REQUIREMENTS FOR VPDSD ENDORSEMENTS.

- a. To qualify for an STCW endorsement as VPDSD, a mariner must present satisfactory documentary evidence, such as a certificate or letter signed by a company official, or a certificate of completion from a Coast Guard-accepted or Coast Guard-approved course, of meeting the requirements in 33 CFR 104.220:
 - 1) Knowledge of current security threats and patterns;
 - 2) Recognition and detection of dangerous substances and devices;
 - 3) Recognition of characteristics and behavioral patterns of persons who are likely to threaten security;
 - 4) Techniques used to circumvent security measures;
 - 5) Crowd management and control techniques;
 - 6) Security related communications;
 - 7) Knowledge of emergency procedures and contingency plans;
 - 8) Operation of security equipment and systems;
 - 9) Testing and calibration of security equipment and systems, and their maintenance while at sea;
 - 10) Inspection, control, and monitoring techniques;
 - 11) Relevant provisions of the Vessel Security Plan (VSP);
 - 12) Methods of physical screening of persons, personal effects, baggage, cargo, and vessel stores:
 - 13) The meaning and the consequential requirements of the different Maritime Security (MARSEC) Levels; and
 - 14) Relevant aspects of the TWIC program and how to carry them out.
- b. In accordance with 46 CFR 15.1113(c) and (d), persons who hold a VSO endorsement will qualify for a VPDSD and SA endorsement.

4. QUALIFICATION REQUIREMENTS FOR SA ENDORSEMENTS.

a. To qualify for an STCW SA endorsement a mariner must present satisfactory documentary evidence, such as a certificate or letter signed by a company official, or a

certificate of completion from a Coast Guard-accepted or Coast Guard-approved course, of meeting the requirements in 33 CFR 104.225:

- 1) Relevant provisions of the VSP;
- 2) The meaning and the consequential requirements of the different MARSEC Levels, including emergency procedures and contingency plans;
- 3) Recognition and detection of dangerous substances and devices;
- 4) Recognition of characteristics and behavioral patterns of persons who are likely to threaten security;
- 5) Techniques used to circumvent security measures; and
- 6) Relevant aspects of the TWIC program and how to carry them out
- b. In accordance with 46 CFR 15.1113(c) and (d), persons who hold a VSO endorsement or a VPDSD endorsement will qualify for a SA endorsement.

GUIDANCE FOR APPROVAL AND/OR ACCEPTANCE OF COURSES

- 1. The Coast Guard will consider granting approvals to Security Awareness (SA) courses and courses for Vessel Personnel with Designated Security Duties (VPDSD).
- 2. To obtain Coast Guard approval, VPDSD and SA courses should be documented and submitted to the Coast Guard as described in 46 CFR 10.402(b). As described in Navigation and Vessel Inspection Circular (NVIC) 03-14, *Guidelines for Approval of Training Courses and Programs*, applications for approval of 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, VPDSD and SA courses may be submitted to the NMC by e-mail to NMCCourses@uscg.mil.

- 3. Mariners who completed a VPDSD or SA course that was granted an interim approval under CG-CVC Policy Letter 12-06, *Endorsement(s)* as Vessel Personnel with Designated Security Duties and for Security-Awareness, will not be required to repeat or supplement their training.
- 4. As specified in 33 CFR 104.215(d)(2), VSO courses must require candidates to demonstrate knowledge, understanding, and proficiency in the following competencies:
 - a. Maintaining and supervising the implementation of a vessel security plan;
 - b. Assessing security risk, threat, and vulnerability;
 - c. Undertaking regular inspections of the vessel to ensure that appropriate security measures are implemented and maintained;
 - d. Ensuring that security equipment and systems, if any, are properly operated, tested and calibrated;
 - e. Encouraging security awareness and vigilance; and
 - f. Ensuring compliance with the Transportation Worker Identification Credential (TWIC) program requirements.

A VSO course that is substantially similar to International Maritime Organization (IMO) Model Course 3.19, *Ship Security Officer*, will be considered to meet these requirements.

- 5. VPDSD courses should provide training such that a student who successfully completes the course will be able to demonstrate knowledge, understanding, and proficiency in the following areas listed in 33 CFR 104.220:
 - a. Current security threats and patterns;
 - b. Recognition and detection of dangerous substances and devices;
 - c. Recognition of characteristics and behavioral patterns of persons who are likely to threaten security;
 - d. Techniques used to circumvent security measures;
 - e. Crowd management and control techniques;
 - f. Security related communications;
 - g. Emergency procedures and contingency plans;
 - h. Operation of security equipment and systems;
 - i. Testing and calibration of security equipment and systems, and their maintenance while at sea:
 - j. Inspection, control, and monitoring techniques;
 - k. Relevant provisions of the Vessel Security Plan (VSP);
 - 1. Methods of physical screening of persons, personal effects, baggage, cargo, and vessel stores;
 - m. The meaning and the consequential requirements of the different Maritime Security (MARSEC) Levels; and
 - n. Relevant aspects of the TWIC program and how to carry them out.

A VPDSD course that is substantially similar to IMO Model Course 3.26, *Security Training* for Seafarers with Designated Security Duties, will be considered to meet these requirements.

- 6. SA courses should provide training such that a student who successfully completes the course will be able to demonstrate knowledge, understanding, and proficiency in the following areas listed in 33 CFR 104.225:
 - a. Relevant provisions of a VSP;
 - b. The meaning and the consequential requirements of the different MARSEC Levels, including emergency procedures and contingency plans;
 - c. Recognition and detection of dangerous substances and devices;

- d. Recognition of characteristics and behavioral patterns of persons who are likely to threaten security;
- e. Techniques used to circumvent security measures; and
- f. Relevant aspects of the TWIC program and how to carry them out.

An SA course that is substantially similar to IMO Model Course 3.27, *Security Awareness Training for All Seafarers*, will be considered to meet these requirements.

Excerpts from the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended

and

Seafarers' Training, Certification and Watchkeeping Code, as amended

NOTICE: These excerpts are provided for background information. By themselves, they do not constitute Coast Guard policy.

The Manila Amendments to the annex to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978

Chapter I

General provisions

Regulation I/6

Training and assessment

Each Party shall ensure that:

- .1 the training and assessment of seafarers, as required under the Convention, are administered, supervised and monitored in accordance with the provisions of section A-I/6 of the STCW Code; and
- .2 those responsible for the training and assessment of competence of seafarers, as required under the Convention, are appropriately qualified in accordance with the provisions of section A-I/6 of the STCW Code for the type and level of training and assessment involved.

Regulation I/8

Quality standards

- **1** Each Party shall ensure that:
 - .1 in accordance with the provisions of section A-I/8 of the STCW Code, all training, assessment of competence, certification, including medical certification, endorsement and revalidation activities carried out by non-governmental agencies or entities under its authority are continuously monitored through a quality standards system to ensure achievement of defined objectives, including those concerning the qualifications and experience of instructors and assessors; and
 - .2 where governmental agencies or entities perform such activities, there shall be a quality standards system.
- 2 Each Party shall also ensure that an evaluation is periodically undertaken, in accordance with the provisions of section A-I/8 of the STCW Code, by qualified persons who are not themselves involved in the activities concerned. This evaluation shall include all changes to national regulations and procedures in compliance with the amendments to the Convention and STCW Code, with dates of entry into force later than the date information was communicated to the Secretary-General.
- **3** A report containing the results of the evaluation required by paragraph 2 shall be communicated to the Secretary-General in accordance with the format specified in section A-I/7 of the STCW Code.

Chapter VI

Emergency, occupational safety, security, medical care and survival functions

Regulation VI/5

Mandatory minimum requirements for the issue of certificates of proficiency for ship security officers

- 1 Every candidate for a certificate of proficiency as ship security officer shall:
 - .1 have approved seagoing service of not less than 12 months or appropriate seagoing service and knowledge of ship operations; and
 - .2 meet the standard of competence for certification of proficiency as ship security officer, set out in section A-VI/5, paragraphs 1 to 4 of the STCW Code.
- 2 Administrations shall ensure that every person found qualified under the provisions of this regulation is issued with a certificate of proficiency.

Regulation VI/6

Mandatory minimum requirements for security-related training and instruction for all seafarers

- 1 Seafarers shall receive security-related familiarization and security-awareness training or instruction in accordance with section A-VI/6, paragraphs 1 to 4 of the STCW Code and shall meet the appropriate standard of competence specified therein.
- Where security awareness is not included in the qualification for the certificate to be issued, a certificate of proficiency shall be issued indicating that the holder has attended a course in security awareness training.
- 3 Every Party shall compare the security-related training or instruction it requires of seafarers who hold or can document qualifications before the entry into force of this regulation with those specified in section A-VI/6, paragraph 4 of the STCW Code, and shall determine the need for requiring these seafarers to update their qualifications.

Seafarers with designated security duties

- **4** Seafarers with designated security duties shall meet the standard of competence specified in section A-VI/6, paragraphs 6 to 8 of the STCW Code.
- 5 Where training in designated security duties is not included in the qualifications for the certificate to be issued, a certificate of proficiency shall be issued indicating that the holder has attended a course of training for designated security duties.
- **6** Every Party shall compare the security training standards required of seafarers with designated security duties who hold or can document qualifications before the entry into force of this regulation with those specified in section A-VI/6, paragraph 8 of the STCW Code, and shall determine the need for requiring these seafarers to update their qualifications.

The Manila Amendments to the Seafarers' Training, Certification and Watchkeeping (STCW) Code

Chapter I

Standards regarding general provisions

Section A-I/6

Training and assessment

- 1 Each Party shall ensure that all training and assessment of seafarers for certification under the Convention is:
 - .1 structured in accordance with written programmes, including such methods and media of delivery, procedures, and course material as are necessary to achieve the prescribed standard of competence; and
 - .2 conducted, monitored, evaluated and supported by persons qualified in accordance with paragraphs 4, 5 and 6.
- 2 Persons conducting in-service training or assessment on board ship shall only do so when such training or assessment will not adversely affect the normal operation of the ship and they can dedicate their time and attention to training or assessment.

Qualifications of instructors, supervisors and assessors*

3 Each Party shall ensure that instructors, supervisors and assessors are appropriately qualified for the particular types and levels of training or assessment of competence of seafarers either on board or ashore, as required under the Convention, in accordance with the provisions of this section.

In-service training

- 4 Any person conducting in-service training of a seafarer, either on board or ashore, which is intended to be used in qualifying for certification under the Convention, shall:
 - .1 have an appreciation of the training programme and an understanding of the specific training objectives for the particular type of training being conducted;
 - .2 be qualified in the task for which training is being conducted; and
 - .3 if conducting training using a simulator:
 - .3.1 have received appropriate guidance in instructional techniques involving the use of simulators; and
 - **.3.2** have gained practical operational experience on the particular type of simulator being used.
- 5 Any person responsible for the supervision of in-service training of a seafarer intended to be used in qualifying for certification under the Convention shall have a full understanding of the training programme and the specific objectives for each type of training being conducted.

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The relevant IMO Model Course(s) may be of assistance in the preparation of courses.

Assessment of competence

- Any person conducting in-service assessment of competence of a seafarer, either on board or ashore, which is intended to be used in qualifying for certification under the Convention, shall:
 - .1 have an appropriate level of knowledge and understanding of the competence to be assessed;
 - .2 be qualified in the task for which the assessment is being made;
 - .3 have received appropriate guidance in assessment methods and practice;
 - .4 have gained practical assessment experience; and
 - if conducting assessment involving the use of simulators, have gained practical assessment experience on the particular type of simulator under the supervision and to the satisfaction of an experienced assessor.

Training and assessment within an institution

Each Party which recognizes a course of training, a training institution, or a qualification granted by a training institution, as part of its requirements for the issue of a certificate required under the Convention, shall ensure that the qualifications and experience of instructors and assessors are covered in the application of the quality standard provisions of section A-I/8. Such qualification, experience and application of quality standards shall incorporate appropriate training in instructional techniques, and training and assessment methods and practice, and shall comply with all applicable requirements of paragraphs 4 to 6.

Chapter VI

Standards regarding emergency, occupational safety, security, medical care and survival functions

Section A-VI/5

Mandatory minimum requirements for the issue of certificates of proficiency for ship security officers

Standard of competence

- 1 Every candidate for a certificate of proficiency as a ship security officer shall be required to demonstrate competence to undertake the tasks, duties and responsibilities listed in column 1 of table A-VI/5.
- 2 The level of knowledge of the subjects listed in column 2 of table A-VI/5 shall be sufficient to enable the candidate to act as the designated ship security officer.
- 3 Training and experience to achieve the necessary level of theoretical knowledge, understanding and proficiency shall take into account the guidance in section B-VI/5 of this Code.
- **4** Every candidate for certification shall be required to provide evidence of having achieved the required standard of competence in accordance with the methods for demonstrating competence and the criteria for evaluating competence tabulated in columns 3 and 4 of table A-VI/5.

 Table A-VI/5

 Specification of minimum standard of competence for ship security officers

Column 1	Column 2	Column 3	Column 4
Competence	Knowledge, understanding and proficiency	Methods for demonstrating competence	Criteria for evaluating competence
Maintain and supervise the implementation of a ship security plan	Knowledge of international maritime security policy and responsibilities of Governments, companies and designated persons,	Assessment of evidence obtained from approved training or examination	Procedures and actions are in accordance with the principles established by the ISPS Code and the SOLAS, 1974, as amended
	including elements that may relate to piracy and armed robbery		Legislative requirements relating to security are correctly identified
	Knowledge of the purpose for and the elements that make up a ship security plan, related procedures and maintenance of records,		Procedures achieve a state of readiness to respond to changes in maritime security levels
	including those that may relate to piracy and armed robbery		Communications within the ship security officer's area of responsibility are clear and understood
	Knowledge of procedures to be employed in implementing a ship security plan and reporting of security incidents Knowledge of maritime security levels and the consequential security measures and procedures aboard ship and in the port facility environment Knowledge of the requirements and procedures for conducting internal audits, on-scene inspections, control and monitoring of security activities specified in a ship security plan		uniderstood
	Knowledge of the requirements and procedures for reporting to the company security officer any deficiencies and non-conformities identified during internal audits, periodic reviews, and security inspections		

Column 1	Column 2	Column 3	Column 4
Competence	Knowledge, understanding and proficiency	Methods for demonstrating competence	Criteria for evaluating competence
Maintain and supervise the implementation of a ship security plan (continued)	Knowledge of the methods and procedures used to modify the ship security plan Knowledge of security-related contingency plans and the procedures for responding to security threats or breaches of security, including provisions for maintaining critical operations of the ship/port interface, including also elements that may relate to piracy and armed robbery Working knowledge of maritime security terms and		
	definitions, including elements that may relate to piracy and armed robbery		
Assess security risk, threat, and vulnerability	Knowledge of risk assessment and assessment tools Knowledge of security assessment documentation, including the Declaration of Security Knowledge of techniques used to circumvent security measures, including those used by pirates and armed robbers Knowledge enabling recognition, on a non-discriminatory basis, of persons posing potential security risks Knowledge enabling recognition of weapons, dangerous substances and devices and awareness of the damage they can cause Knowledge of crowd management and control techniques, where appropriate	Assessment of evidence obtained from approved training, or approved experience and examination, including practical demonstration of competence to: 1 conduct physical searches 2 conduct non-intrusive inspections	Procedures and actions are in accordance with the principles established by the ISPS Code and the SOLAS, 1974, as amended Procedures achieve a state of readiness to respond to changes in the maritime security levels Communications within the ship security officer's area of responsibility are clear and understood

Column 1	Column 2	Column 3	Column 4
Competence	Knowledge, understanding and proficiency	Methods for demonstrating competence	Criteria for evaluating competence
Assess security risk, threat, and vulnerability (continued)	Knowledge in handling sensitive security-related information and security-related communications		
	Knowledge of implementing and co-ordinating searches\		
	Knowledge of the methods for physical searches and non-intrusive inspections		
Undertake regular inspections of the ship to ensure that	Knowledge of the requirements for designating and monitoring restricted areas	Assessment of evidence obtained from approved training or examination	Procedures and actions are in accordance with the principles established by the ISPS Code and the SOLAS,1974, as amended
appropriate security measures are implemented	Knowledge of controlling access to the ship and to restricted areas on board ship		Procedures achieve a state of readiness to respond to changes in the maritime security levels
and maintained	Knowledge of methods for effective monitoring of deck areas and areas surrounding the ship		Communications within the ship security officer's area of responsibility are clear and
	Knowledge of security aspects relating to the handling of cargo and ship's stores with other shipboard personnel and relevant port facility security officers		understood
	Knowledge of methods for controlling the embarkation, disembarkation and access while on board of persons and their effects		
Ensure that security equipment and systems, if any, are properly operated, tested and calibrated	Knowledge of the various types of security equipment and systems and their limitations, including those that could be used in case of attacks by pirates and armed robbers	Assessment of evidence obtained from approved training or examination	Procedures and actions are in accordance with the principles established by the ISPS Code and the SOLAS, 1974, as amended
	Knowledge of the procedures, instructions and guidance on the use of ship security alert systems		

Column 1	Column 2	Column 3	Column 4
Competence	Knowledge, understanding and proficiency	Methods for demonstrating competence	Criteria for evaluating competence
	Knowledge of the methods for testing, calibrating, and maintaining security systems and equipment, particularly whilst at sea		
Encourage security awareness and vigilance	Knowledge of training, drill and exercise requirements under relevant conventions, codes and IMO circulars, including those relevant to anti-piracy and anti-armed robbery Knowledge of the methods for enhancing security awareness and vigilance on board Knowledge of the methods for assessing the effectiveness of drills and exercises	Assessment of evidence obtained from approved training or examination	Procedures and actions are in accordance with the principles established by the ISPS Code and the SOLAS, 1974, as amended Communications within the ship security officer's area of responsibility are clear and understood

Section A-VI/6

Mandatory minimum requirements for security-related training and instruction for all seafarers

Standard of competence for security-related familiarization training

- 1 Before being assigned to shipboard duties, all persons employed or engaged on a seagoing ship which is required to comply with the provisions of the ISPS Code, other than passengers, shall receive approved security-related familiarization training, taking account of the guidance given in part B, to be able to:
 - .1 report a security incident, including a piracy or armed robbery threat or attack;
 - .2 know the procedures to follow when they recognize a security threat; and
 - .3 take part in security-related emergency and contingency procedures.
- 2 Seafarers with designated security duties engaged or employed on a seagoing ship shall, before being assigned such duties, receive security-related familiarization training in their assigned duties and responsibilities, taking into account the guidance given in part B.
- 3 The security-related familiarization training shall be conducted by the ship security officer or an equally qualified person.

Standard of competence for security-awareness training

- 4 Seafarers employed or engaged in any capacity on board a ship which is required to comply with the provisions of the ISPS Code on the business of that ship as part of the ship's complement without designated security duties shall, before being assigned to any shipboard duties:
 - .1 receive appropriate approved training or instruction in security awareness as set out in table A-VI/6-1;
 - .2 be required to provide evidence of having achieved the required standard of competence to undertake the tasks, duties and responsibilities listed in column 1 of table A-VI/6-1:
 - **.2.1** by demonstration of competence, in accordance with the methods and the criteria for evaluating competence tabulated in columns 3 and 4 of table A-VI/6-1; and
 - **.2.2** by examination or continuous assessment as part of an approved training programme in the subjects listed in column 2 of table A-VI/6-1.

Transitional provisions

- 5 Until 1 January 2014, seafarers who commenced an approved seagoing service prior to the date of entry into force of this section shall be able to establish that they meet the requirements of paragraph 4 by:
 - .1 approved seagoing service as shipboard personnel, for a period of at least six months in total during the preceding three years; or

- having performed security functions considered to be equivalent to the seagoing service required in paragraph 5.1; or
- .3 passing an approved test; or
- .4 successfully completing approved training.

Standard of competence for seafarers with designated security duties

- 6 Every seafarer who is designated to perform security duties, including anti-piracy and anti-armed-robbery-related activities, shall be required to demonstrate competence to undertake the tasks, duties and responsibilities listed in column 1 of table A-VI/6-2.
- 7 The level of knowledge of the subjects in column 2 of table A-VI/6-2 shall be sufficient to enable every candidate to perform on board designated security duties, including anti-piracy and anti-armed-robbery-related activities.
- **8** Every candidate for certification shall be required to provide evidence of having achieved the required standard of competence through:
 - .1 demonstration of competence to undertake the tasks, duties and responsibilities listed in column 1 of table A-VI/6-2, in accordance with the methods for demonstrating competence and the criteria for evaluating competence tabulated in columns 3 and 4 of that table; and
 - examination or continuous assessment as part of an approved training programme covering the material set out in column 2 of table A-VI/6-2.

Transitional provisions

- **9** Until 1 January 2014, seafarers with designated security duties who commenced an approved seagoing service prior to the date of entry into force of this section shall be able to demonstrate competence to undertake the tasks, duties and responsibilities listed in column 1 of table A-VI/6-2 by:
 - .1 approved seagoing service as shipboard personnel with designated security duties, for a period of at least six months in total during the preceding three years; or
 - having performed security functions considered to be equivalent to the seagoing service required in paragraph 9.1; or
 - .3 passing an approved test; or
 - **.4** successfully completing approved training.

 Table A-VI/6-1

 Specification of minimum standard of competence in security awareness

Column 1	Column 2	Column 3	Column 4
Competence	Knowledge, understanding and proficiency	Methods for demonstrating competence	Criteria for evaluating competence
Contribute to the enhancement of maritime security through heightened awareness	Basic working knowledge of maritime security terms and definitions, including elements that may relate to piracy and armed robbery Basic knowledge of international maritime security policy and responsibilities of Governments, companies and persons Basic knowledge of maritime security levels and their impact on security measures and procedures aboard ship and in port facilities Basic knowledge of security reporting procedures Basic knowledge of security reporting procedures	Assessment of evidence obtained from approved instruction or during attendance at an approved course	Requirements relating to enhanced maritime security are correctly identified

Column 1	Column 2	Column 3	Column 4		
Competence	Knowledge, understanding and proficiency	Methods for demonstrating competence	Criteria for evaluating competence		
Recognition of security threats	Basic knowledge of techniques used to circumvent security measures Basic knowledge enabling recognition of potential security threats, including elements that may relate to piracy and armed robbery Basic knowledge enabling recognition of weapons, dangerous substances and devices and awareness of the damage they can cause Basic knowledge in handling security-related information and security-related communications	Assessment of evidence obtained from approved instruction or during attendance at an approved course	Maritime security threats are correctly identified		
Understanding of the need for and methods of maintaining security awareness and vigilance	Basic knowledge of training, drill and exercise requirements under relevant conventions, codes and IMO circulars, including those relevant for anti-piracy and anti-armed robbery	Assessment of evidence obtained from approved instruction or during attendance at an approved course	Requirements relating to enhanced maritime security are correctly identified		

Table A-VI/6-2 Specification of minimum standard of competence for seafarers with designated security duties

Column 1	Column 2	Column 3	Column 4
Competence	Knowledge, understanding and proficiency	Methods for demonstrating competence	Criteria for evaluating competence
Maintain the conditions set out in a ship security plan	Working knowledge of maritime security terms and definitions, including elements that may relate to piracy and armed robbery	Assessment of evidence obtained from approved instruction or during attendance at an approved course	Procedures and actions are in accordance with the principles established by the ISPS Code and the SOLAS, 1974, as amended
	Knowledge of international maritime security policy and responsibilities of Governments, companies and persons, including working knowledge of elements that may relate to piracy and armed robbery		Legislative requirements relating to security are correctly identified Communications within the area of responsibility are clear and understood
	Knowledge of maritime security levels and their impact on security measures and procedures aboard ship and in the port facilities		
	Knowledge of security reporting procedures		
	Knowledge of procedures and requirements for drills and exercises under relevant conventions, codes and IMO circulars, including working knowledge of those that may relate to piracy and armed robbery		
	Knowledge of the procedures for conducting inspections and surveys and for the control and monitoring of security activities specified in a ship security plan		
	Knowledge of security-related contingency plans and the procedures for responding to security threats or breaches of security, including provisions for maintaining critical operations of the ship/port interface, and including also working knowledge of those that may relate to piracy and		

Column 1	Column 2	Column 3	Column 4
Competence	Knowledge, understanding and proficiency	Methods for demonstrating competence	Criteria for evaluating competence
	armed robbery		
Recognition of security risks and threats	Knowledge of security documentation, including the Declaration of Security Knowledge of techniques used to circumvent security	Assessment of evidence obtained from approved instruction or during attendance at an approved course	Procedures and actions are in accordance with the principles established by the ISPS Code and the SOLAS, 1974, as amended
	measures, including those used by pirates and armed robbers		
	Knowledge enabling recognition of potential security threats		
	Knowledge enabling recognition of weapons, dangerous substances and devices and awareness of the damage they can cause		
	Knowledge of crowd management and control techniques, where appropriate		
	Knowledge in handling security-related information and security-related communications		
	Knowledge of the methods for physical searches and non-intrusive inspections		
Undertake regular security	Knowledge of the techniques for monitoring restricted areas	Assessment of evidence obtained from approved	Procedures and actions are in accordance with the
inspections of the ship	Knowledge of controlling access to the ship and to restricted areas on board ship	instruction or during attendance at an approved course	principles established by the ISPS Code and the SOLAS, 1974, as amended
	Knowledge of methods for effective monitoring of deck areas and areas surrounding the ship		
	Knowledge of inspection methods relating to the cargo and ship's stores		
	Knowledge of methods for controlling the embarkation, disembarkation and access		

Column 1	Column 2	Column 3	Column 4
Competence	Knowledge, understanding and proficiency	Methods for demonstrating competence	Criteria for evaluating competence
	while on board of persons and their effects		
Proper usage of security equipment and systems, if any	General knowledge of various types of security equipment and systems, including those that could be used in case of attacks by pirates and armed robbers, including their limitations Knowledge of the need for testing, calibrating, and maintaining security systems and equipment, particularly whilst at sea	Assessment of evidence obtained from approved instruction or during attendance at an approved course	Equipment and systems operations are carried out in accordance with established equipment operating instructions and taking into account the limitations of the equipment and systems Procedures and actions are in accordance with the principles established by the ISPS Code and the SOLAS, 1974, as amended

GUIDANCE REGARDING PROVISIONS OF THE ANNEX TO THE STCW CONVENTION PART B

Chapter I

Guidance regarding general provisions

Section B-I/6

Guidance regarding training and assessment

Qualifications of instructors and assessors

1 Each Party should ensure that instructors and assessors are appropriately qualified and experienced for the particular types and levels of training or assessment of competence of seafarers, as required under the Convention, in accordance with the guidelines in this section.

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Chapter V

Guidance regarding emergency, occupational safety, security, medical care and survival functions

Section B-VI/5

Guidance regarding training and certification for ship security officers

- 1 The training should be relevant to the provisions of the ISPS Code and the SOLAS Convention, as amended*.
- 2 On completion of training, a ship security officer should have adequate knowledge of the English language to correctly interpret and communicate messages relevant to ship or port facility security.
- 3 In circumstances of exceptional necessity, when a person holding a certificate of proficiency as a ship security officer is temporarily unavailable, the Administration may permit a seafarer having specific security duties and responsibilities and an understanding of the ship security plan to serve as ship security officer and to execute all duties and responsibilities of the ship security officer until the next port of call or for a period not exceeding 30 days, whichever is greater. The company should, as soon as possible, inform the competent authorities of the next port(s) of call of the arrangements in place.

Section B-VI/6

Guidance regarding mandatory minimum requirements for security-related training and instruction for all seafarers

Familiarization and security-awareness

- 1 Seafarers and shipboard personnel are not security experts and it is not the aim of the provisions of the Convention or this Code to convert them into security specialists.
- 2 Seafarers and shipboard personnel should receive adequate security-related training or instruction and familiarization training so as to acquire the required knowledge and understanding to perform their assigned duties and to collectively contribute to the enhancement of maritime security.

- * The relevant IMO Model Course(s) may be of assistance in the preparation of courses.
- 3 Seafarers without designated security duties should complete the security awareness training or instruction set out in section A-VI/6 at least one time in their career. There is no need for refreshment or revalidation of this training if the seafarer or the shipboard personnel concerned meet the security-related familiarization requirements of regulation VI/6 and participate in the drills and exercises required by the ISPS Code.

Seafarers with designated security duties

- 4 The expression "with designated security duties" in section A-VI/6 denotes those having specific security duties and responsibilities in accordance with the ship security plan.
- 5 Seafarers with designated security duties should complete the training as set out in section A-VI/6 at least one time in their career. There is no need for refreshment or revalidation of this training if the seafarer or the shipboard personnel concerned meet the security-related familiarization requirements of regulation VI/6 and participate in the drills and exercises required by the ISPS Code.
- 6 Those providing "security-related familiarization training" in accordance with section A-VI/6 should not be required to meet the requirements of either regulation I/6 or of section A-I/6.
- In circumstances of exceptional necessity, when the shipboard security-related duties are required to be undertaken by a person qualified to perform designated security-related duties and such a person is temporarily unavailable, the Administration may permit a seafarer without designated security duties to perform such duties provided such a person has an understanding of the ship security plan, until the next port of call or for a period not exceeding 30 days, whichever is greater.