



USCG Office of Commercial Vessel Compliance (CG-CVC)
Mission Management System (MMS) Work Instruction (WI)



Category	Fishing Vessel Drill Conductor Program				
Title	Guidelines for Training Commercial Fishermen, Administration of Onboard Drills, and Acceptance of Training Courses				
Serial	CVC-WI-016	Orig. Date	24MAR19	Rev. Date	N/A
Disclaimer:	<p>This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. 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 may assist industry, mariners, the public, and the Coast Guard, as well as other federal and state regulators, in applying statutory and regulatory requirements. You can use an alternative approach for complying with these requirements 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 Coast Guard Office of Commercial Vessel Compliance (CG-CVC) at CG-CVC@uscg.mil who is responsible for implementing this guidance.</p>				
References:	<p>(a) Title 46, Code of Federal Regulations (CFR), Part 28 (b) Title 46, Code of Federal Regulations (CFR), Part 11 (c) Title 33, Code of Federal Regulations (CFR), Part 1 (d) Navigation and Vessel Inspection Circular 03-14: Guidelines for Approval of Training Courses and Programs</p>				

- A. Purpose. To provide guidance on the criteria for commercial fishermen to conduct onboard drills.
- B. Action. This work instruction applies to Coast Guard Commercial Fishing Vessel Safety (CFVS) dockside examiners, marine training professionals, and institutions seeking Coast Guard acceptance for safety courses related to commercial fishing vessels.
- C. Background. The proper training of commercial fishermen is a cornerstone to the survival triangle: training, equipment and attitude. These attributes will reinforce learned skills needed in an emergency, contribute to survivability when confronted with dangerous situations, and emphasize the critical importance of crew preparedness and risk mitigation while working in the marine environment. In addition, the evaluation of the curriculum and instructors assigned to these training courses should align with applicable regulations, yet offer enough flexibility for outreach programs in the commercial fishing vessel community. Where suitable, portable and flexible teaching methods may be employed in remote areas provided students can complete the objectives and demonstrate or describe the required skills.
- D. Discussion. It is the responsibility of the vessel’s master or individual in charge to ensure monthly drills and instructions are given and to provide a safety orientation to each person on board. The person who conducts the drills and/or provides the orientation need not be the master or a member of the crew, but must be trained in the proper procedures listed in 46 CFR 28.270. To meet minimum qualifications, Fishing Vessel Drill Conductors must be trained by an accepted Fishing Vessel Safety Instructor and be issued documents attesting to successful completion of training. Fishing Vessel Drill Conductors may provide instruction and perform emergency drills at any location and on board any fishing vessel to which the regulations apply.

1. Drills, Instruction and Safety Orientation

- a. Coast Guard CFVS Examiners and law enforcement boarding officers must evaluate a vessel's compliance with 46 CFR 28.270. The logging of drills is not currently required by regulation. Therefore, the examiner or boarding officer should inquire with the master, individual in charge and crewmembers regarding their last series of drills. The master or individual in charge may be asked to provide a summary of the last drills performed, including lessons learned by the master and crew. Lessons learned can be drawn from various positive or negative aspects of the drill. When properly incorporated, lessons learned can add benefit to future evolutions.
- b. The intent of the Coast Guard is not to dictate which drills a vessel conducts on a specific occasion, but the drill or drill series must cover all 10 contingencies listed in enclosure (1). In general, all the contingencies may be addressed in four separate drills (man overboard, flooding, fire and abandon ship).
- c. As required by 46 CFR 28.270(b), everyone onboard is to participate in the drills and associated emergency equipment, devices and clothing should be used during exercises. Masters and individuals in charge must participate along with the crew. All individuals must practice donning their appropriate immersion suits and/or personal flotation devices. Drill scenarios should strive to demonstrate a sense of urgency and realism without compromising a safe setting. The drill conductor may take this opportunity to provide additional instruction to crew members needing assistance, critique individual performance, and to refine the vessel's emergency plans.
- d. The general alarm and/or public address system must be tested, if required to be on board, in addition to any other emergency signals utilized to alert the crew of emergencies. Detection systems and alarms should be tested; they include, but are not limited to: heat, smoke, high-water, carbon monoxide and Freon or ammonia detectors. Local OCMI policy on operational testing of detection systems during inspections/examinations should be followed.
- e. On solo operator vessels, monthly drills are also required in accordance with 46 CFR 28.270(a). The operator should rehearse procedures for fire, flooding and abandon ship situations. In particular, a contingency for falls overboard should be considered.
- f. The purpose of the required safety orientation is to ensure all individuals on board are familiar with the emergency instructions, alarms and equipment, and to learn their individual responsibilities before the vessel may be operated. This is provided to new crewmembers who may not have participated in the previous month's drills or received instruction on emergency procedures. It is an opportunity for the master or individual in charge to provide personalized instruction to new members that may not be familiar with a vessel's unique features or characteristics.

2. Fishing Vessel Safety Instructor and Drill Conductor Courses

- a. Acceptance of Fishing Vessel Safety Instructors and curricula for training Fishing Vessel Drill Conductors is to be administratively efficient and flexible, ensuring that accepted instructors meet a minimum standard of qualification and that curricula are evaluated to meet professional competency and regulatory training requirements. Training facilities and their training aids must be found suitable to the requirements of the course and the needs of the students.
- b. An individual Fishing Vessel Safety Instructor desiring to provide training to Fishing Vessel Drill Conductors must apply for Coast Guard acceptance by submitting a written request to the cognizant OCMI, as outlined in 46 CFR 28.275.
- c. Training institutions and organizations desiring to provide training to Fishing Vessel Drill Conductors may apply for Coast Guard acceptance by submitting written requests to the Coast Guard National Maritime Center ([NMC](#)). These requests must provide sufficient documentation

establishing that individuals within the submitting organization meet the criteria outlined in reference (d).

- d. In this matter, the National Maritime Center (NMC) has the same authority as an Officer in Charge, Marine Inspection (OCMI) per reference (c) and is the central office for review and determination of Coast Guard approved and accepted courses for training organizations. Training providers are encouraged to submit their courses and programs in an electronic format as per reference (d). Additional requirements may be necessary to comply with merchant mariner credentialing requirements onboard commercial fishing vessels of 200 gross tons or greater, per reference (b).

3. Resources

- a. Information on training resources that can benefit CFVS dockside vessel examiners, maritime training professionals, and the fishing industry, is available at:
<https://www.dco.uscg.mil/FishSafe> and <http://www.fishsafewest.info/Training.asp>

M. EDWARDS
Captain, U.S. Coast Guard
Office of Commercial Vessel Compliance

Enclosure: (1) Guide for 46 CFR Subchapter C, Instruction, Drills and Safety Orientation
(2) Guide for 46 CFR Subchapter C, Acceptance Criteria for Instructors and Course Curricula For Fishing Vessel Safety Instructor

GUIDE for 46 CFR SUBCHAPTER C: INSTRUCTION, DRILLS and SAFETY ORIENTATION

This enclosure provides guidance for CFV Safety Examiners, marine training institutions and associated instructors found in Subchapter C, 46 CFR § 28.270.

Subject	Citation (46 CFR)	Specific Requirement
Master or individual in charge must ensure that drills are conducted and instruction is given to each individual on board at least once each month...	§28.270 (a)	Requirement to train for the following contingencies: <ol style="list-style-type: none"> (1) Abandoning the vessel; (2) Fighting a fire in different locations on board the vessel; (3) Recovering an individual from the water; (4) Minimizing the effects of unintentional flooding; (5) Launching survival craft and launching lifeboats and rescue boats; (6) Donning immersion suits and other wearable personal floatation devices; (7) Donning a fireman’s outfit and a self-contained breathing apparatus, if the vessel is so equipped; (8) Making a voice radio distress call and using visual distress signals; (9) Activating the general alarm; and (10) Reporting inoperative alarm systems and fire detection systems.
Participation	§28.270 (b)	<ol style="list-style-type: none"> (1) Drills must be conducted on board as if there was an actual emergency and must include participation by all individuals on board, (2) Breaking out and using emergency equipment, (3) Testing of all alarm and detection systems, (4) Donning protective clothing, (5) Donning of immersion suits, if the vessel is so equipped.
Training	§28.270 (c) §28.270 (d)	No individual may conduct drills required by this section unless trained in proper procedures for conducting the activity. The viewing of videotapes, followed by a discussion led by an individual familiar with these contingencies will satisfy the requirement for instruction only, not drills.
Safety Orientation	§28.270 (e) §28.270(f)	The master or individual in charge must ensure that a safety orientation is given to each individual on board that has not received instruction and has not participated in the drills listed above, before the vessel may be operated. Safety orientation must explain the required posted emergency instructions while also covering the evolutions listed above.

GUIDE for 46 CFR SUBCHAPTER C: ACCEPTANCE CRITERIA for INSTRUCTORS and COURSE CURRICULA for FISHING VESSEL SAFETY INSTRUCTOR

This enclosure provides guidance for CFV Safety Examiners, marine training institutions and associated instructors found in Subchapter C, 46 CFR § 28.275.

Subject	Citation (46 CFR)	Specific Requirement
To meet criteria for Fishing Vessel Safety Instructor	§28.275 (a)	Submit detailed course curriculum that relates directly to the contingencies listed in §28.270 (see Enclosure 1), to the cognizant OCMI.
Documentation of accepted curriculum	§28.275 (a)	Note: U. S. Marine Safety Association (USMA) no longer provides curriculum, individuals desiring to acquire acceptance through the cognizant OCMI must submit proof of experience as outlined below.
Proof of Experience	§28.275 (a) (1-3)	<p>(1) At least 1 year of experience in a marine related field and experience that relates directly to the contingencies listed in §28.270 (a), including –</p> <ul style="list-style-type: none"> • Experience as an instructor; or • Training received in instructional methods; or <p>(2) A valid license or officer endorsement issued by the Coast Guard authorizing service as master of uninspected fishing industry vessels and proof of experience that relates to the contingencies listed in §28.275 (a), including:</p> <ul style="list-style-type: none"> • Experience as an instructor; or • Training received in instructional methods; or <p>(3) A valid license of officer endorsement issued by the Coast Guard authorizing service as a master of uninspected vessels of 100 gross tons or more and proof of experience that relates directly to the contingencies listed in §28.270 (a) including –</p> <ul style="list-style-type: none"> • Experience as an instructor, or • Training received in instructional methods
Acceptance	<p>§28.275 (b)</p> <p>§28.275 (c)</p>	<p>Each OCMI will issue a letter of acceptance to all qualified individuals and will maintain a list of accepted instructors in his/her zone.</p> <p>Letters of acceptance valid for a period of 5 years</p>