



Marine Safety Information Bulletin

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MSIB Number: 06-14
Date: March 21, 2014
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Uniform Approach on Treatment of Mariner Security Training Certification Under the 2010 Manila Amendments to the STCW Convention

The IMO Sub-Committee on Human Element, Training and Watchkeeping (HTW) reviewed the implementation of the security endorsement requirements of STCW and recognized that many seafarers world-wide had practical difficulties obtaining either security awareness training or the training for personnel with designated security duties, before the end of the transitional period on 1 January 2014. This is required by regulation VI/6 of the STCW Convention and section A-VI/6, paragraphs 4 and 6 of the STCW Code. For U.S. vessels subject to the STCW, the USCG recently published a final rule with regulations to implement these provisions. Previous guidance was promulgated in CG-CVC Policy Letter No. 12-06.

Recognizing these challenges, the IMO promulgated circular STCW.7/Circ.21 urging that Administrations inform their port state control authorities, recognized organizations and recognized security organizations that, until **1 July 2015**, it would be sufficient to accept compliance with Section 13 of the International Ship and Port Facility Security (ISPS) Code, Part A if a seafarer does not carry certification in security awareness training or the training for personnel with designated security duties as required by STCW. 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.

The USCG agrees with circular STCW.7/Circ.21, and has adopted a modified enforcement posture for security awareness training and seafarers with designated security duties certification on subject U.S. vessels until **1 July 2015**. **This is contingent upon** a mariner's compliance with 33 CFR 104.220 and 104.225, which have been determined to meet the requirements of Section 13 of the ISPS Code, Part A. USCG Marine Inspectors will continue to verify mariner certification with regard to the security awareness training and/or training for personnel with designated security duties in accordance with regulation VI/6 of the STCW Convention. If certification is not in accordance with the STCW Convention, but the mariner meets the criterion of 33 CFR 104.220 and 104.225, and thus Section 13 of the ISPS Code, Part A, no control action will be initiated. However, for vessels to which the ISPS Code applies, Marine Inspectors should document non-compliance as deficiencies on Form CG-835 with a compliance date of **July 1, 2015**, citing 46 CFR 15.1113(c) and (e), respectively. Separate guidance has been provided to USCG Port State Control Officers via CGMS.

Although circular STCW.7/Circ.21 urges port state control authorities to take the implementation difficulties related to the security training certification of seafarers, port state control officers may record the findings of non-compliance with the STCW Convention as a deficiency in their inspection report. Additionally, port state control authorities are not obligated to adopt a reduced enforcement posture. Accordingly, the USCG strongly encourages owners and operators of subject U.S. vessels to ensure that mariners obtain these endorsements in accordance with 2010 Manila amendments to the STCW as soon as possible. Additional questions on this MSIB should be directed to MMCPolicy@uscg.mil.