



# Marine Safety Information Bulletin

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## Electro-Technical Officer (ETO) and Electro-Technical Rating (ETR) Endorsement(s) on U.S. Flag Vessels

Recently, the Coast Guard has been informed of multiple instances where U.S. flag vessels have received Port State Control (PSC) deficiencies as a result of the port State's misinterpretation of requirements related to the carriage of ETO/ETR's endorsed under regulations III/6 and III/7 of the International Convention on Standards of Training, Certification and Watchkeeping (STCW), 1978, as amended.

On February 06, 2017 the International Maritime Organization (IMO) published STCW.7/Circ.24 "Interim Guidance for Parties Administrations, port State control authorities, recognized organizations and other relevant parties on the requirements of the STCW Convention, 1978, as amended." In paragraph 15 of the circular, the following guidance was provided:

*Misinterpretation of the applicable provision of regulations II/5, III/5, III/6 and III/7 has been reported. In particular, port State control officers have required personnel on board to possess an applicable Certificate of Competency or Certificate of Proficiency, when such personnel are not included in the Minimum Safe Manning Document (MSMD) of the ship<sup>1</sup>.*

In 2013, the Coast Guard amended the regulations<sup>2</sup> to facilitate the issuance of ETO/ETR endorsements in accordance with STCW Regulations III/6 and III/7 respectively. However, there are currently no corresponding regulations to require an ETO/ETR on the Minimum Safe Manning Document for any U.S. flag vessel.

The Coast Guard has become aware of instances where U.S. flag vessels have received PSC deficiencies due to the port State's confusion between the STCW ratings of ETO/ETR and the domestic Qualified Member of the Engine Department (QMED) rating with a corresponding "electrician/refrigeration engineer" endorsement. Specifically, the confusion arises when a QMED-"electrician/refrigeration engineer" is recorded as an "electrician" on the vessel's crew list. To avoid this confusion, it is recommended that vessel owner/operators record all persons serving as part of the crew complement by their applicable STCW capacity (e.g. able seafarer-engine or Rating Forming Part of an Engineering Watch (RFPEW)) on the crew list.

Vessel owner/operators are reminded that in accordance with 46 CFR 15.404(d)(3), persons serving on vessels subject to STCW as junior engineer, pumpman/machinist and/or electrician refrigeration engineer must hold an STCW endorsement as able seafarer-engine (STCW III/5). All other QMED endorsements, such as QMED-Oiler, must hold an STCW endorsement as RFPEW; STCW III/4).

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<sup>1</sup> Emphasis added

<sup>2</sup> For requirements to qualify for an STCW endorsement as ETO/ETR, see 46 CFR 11.335 and 46 CFR 12.611, respectively