

U.S. Department of
Homeland Security

United States
Coast Guard



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16720
CG-MMC Policy Letter
No. 02-17 (CH-1)
October 20, 2017

From: M. Medina 
COMDT (CG-MMC)

To: Distribution

Subj: CREDENTIALING OF SEAFARERS WORKING ON BOARD HURRICANE
MARIA RELIEF VESSELS INVOLVED WITH THE EMERGENCY SUPPORT OF
THE COMMONWEALTH OF PUERTO RICO AND U.S. VIRGIN ISLANDS

1. Purpose. This policy letter provides guidance for the credentialing of seafarers working on vessels supporting the Hurricane Maria relief effort in the Commonwealth of Puerto Rico and U.S. Virgin Islands. This policy letter provides the guidelines to be used by Sector Commanders and Officers in Charge, Marine Inspection (OCMI) when considering requests for vessels to participate in this relief effort. This policy letter will expire on January 31, 2018.
2. Action. The Coast Guard will use this policy as a guide for determining appropriate manning of vessels providing relief support.
3. Directives Affected. None.
4. Background.
 - a. United States law requires that seagoing vessels be operated by individuals having the appropriate officer endorsement authorizing service in the capacity in which the individual is employed¹. 46 CFR 6.01 allows the Coast Guard to waive compliance with navigation and inspection laws, which include but are not limited to, manning requirements related to vessel crewing, watchstanding and mariner credentialing.

¹ See generally 46 USC Chapters 71 and 83. This includes an endorsement containing the appropriate route. Endorsements with a near coastal route authorize service on ocean waters within 200 miles of the U.S. and its possessions. See 46 CFR 10.107(b). Typically, a voyage between the continental United States and Puerto Rico or U.S. Virgin Islands would require an officer to hold an endorsement authorizing service on *ocean* routes.

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- b. 46 CFR 15.401 requires that companies may employ individuals holding credentials appropriate for the service within the restriction of the credential.
- c. 46 CFR 15.501 provides for the OCMI to determine for a particular vessel the appropriate manning dependent upon laws, regulations, and such factors as: emergency situations, size and type of vessel, installed equipment, frequency of port calls.
- d. Policy letter CVC 17-06 (CH1) establishes that the OCMI may issue waivers to the COI manning requirements on a case-by case-basis consistent with existing policy.

5. Discussion.

- a. United States deck officers seeking near coastal or oceans endorsements meet most of the same requirements to obtain the route.
- b. 46 CFR 15.405 requires each credentialed crewmember to become familiar with the relevant characteristics of the vessels appropriate to his or her duties and responsibilities. It is important that the Coast Guard ensure that those operating vessels in emergency situations are familiar with the vessel upon which they are operating. Requiring a change of vessel crew for emergency response, such as hurricane relief efforts to the Commonwealth of Puerto Rico and the U.S. Virgin Islands, would delay the necessary response to the emergency and the ability to use the vessel.
- c. Vessels approved to support the instant emergency relief efforts in Puerto Rico and U.S. Virgin Islands should be operated by mariners most familiar with those specific vessels, including knowledge of safety and fire fighting equipment, vessel handling characteristics, and navigational abilities, despite such individuals possibly holding credentials limited to coastal service.

6. Guidance.

- a. The cognizant OCMI may allow vessel owners or operators to use merchant officers holding near coastal endorsements, where these officers hold both the national and STCW endorsements. These officers should be those who regularly crew the vessel.
- b. Use of merchant officers holding near coastal endorsements on board these vessels should be annotated on the vessel's Certificate of Inspection specifically allowing officers holding endorsements for near coastal routes to serve on the vessel in the relief efforts to Puerto Rico and the U.S. Virgin Islands.
- c. The cognizant OCMI may allow the use of mariners holding officer endorsements, limited to offshore supply vessels, only in support of the hurricane relief effort where the offshore supply vessel is approved for this limited use.

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- d. This policy is limited to the following voyages for the purposes of supporting hurricane relief efforts: those between ports in the United States and either Puerto Rico or U.S. Virgin Islands; to and from ports in Puerto Rico and U.S. Virgin Islands; and ports within Puerto Rico or U.S. Virgin Islands. The voyages should minimize the vessels distance from shore beyond 200 Nautical miles. Transits into ports of other countries is not authorized under this suspension of the manning rules.
7. Disclaimer. While the guidance contained in this document may assist the industry, public, Coast Guard, and other Federal and State regulators in applying statutory and regulatory requirements, the guidance is not a substitute for applicable legal requirements nor is it a regulation itself.
8. Changes. This policy letter will be posted on the web at <http://homeport.uscg.mil>. Changes to this policy will be issued as necessary. Suggestions for improvements of this policy should be submitted in writing to Commandant, U.S. Coast Guard Headquarters, Office of Merchant Mariner Credentialing, (CG-MMC) at the address listed on the first page

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