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16721 NMC Policy Letter 08-03

AUG 1 2 2003

From: Commanding Officer, U.S. Coast Guard National Maritime Center

To: Distribution

Subj: REMOVAL OF DATES FOR COMPLETION OF BASIC SAFETY TRAINING (BST) FROM CERTIFICATES ISSUED UNDER THE INTERNATIONAL CONVENTION ON STANDARDS OF TRAINING, CERTIFICATION, AND WATCHKEEPING FOR SEAFARERS, 1978, AS AMENDED (STCW)

Ref: (a) Title 46, Code of Federal Regulations, Parts 10, 12, and 15

(b) NMC Policy Letter 12-01, Continuing Competency in Basic Safety Training

## 1. PURPOSE.

- a. This policy letter provides guidance to the Regional Examination Centers about the removal from the STCW certificate of the date(s) that show when a mariner completed BST.
- b. The guidance in this document may assist industry and individual mariners to meet the requirements of references (a) and (b). 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.
- 2. <u>ACTION</u>. Commanding officers of units with a Regional Examination Center shall be governed by this policy letter. Commanding officers of units with marine safety responsibilities should bring this policy letter to the attention of the maritime industry with interests in marine personnel issues and to institutions that offer U. S. Coast Guard approved training. This policy letter will be distributed by electronic means only. It is available on the World Wide Web at <a href="http://www.uscg.mil/STCW/m-policy.htm">http://www.uscg.mil/STCW/m-policy.htm</a>.

## 3. BACKGROUND

- a. The 1995 amendments to the STCW provide general guidelines about which mariners are required to complete basic safety training. Reference (a) expands upon the general requirements of the STCW and provides specific information about which mariners are required to complete BST.
- b. The STCW regulations requiring that competency in BST be established at intervals not exceeding five years were clarified by the IMO in the document STW 28/WP.1/Rev 1, to mean that renewal was not required provided the mariner continued to maintain competency. Reference (b) sets forth the information about the IMO decision and establishes policies for a mariner to maintain competency based on sea service. Reference (b) includes a formula for calculating the date from which a mariner's competency in BST

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may be established. As a mariner acquires further sea service, the date of competency in BST also changes and moves forward in time.

## 4. DISCUSSION.

- a. The completion date of BST shown on the STCW certificate was originally intended to show when the training was completed and thereby indicate the due date for the five-year renewal. With the revised method for determining if a mariner is competent in BST, the validity date constantly changes as a mariner accrues sea service. Now, inclusion of the date at the bottom of the STCW certificate may be misleading to the mariner, maritime employers, and port state control officers.
- b. Effective immediately, Regional Examination Centers will no longer include the BST completion dates on the STCW certificates. When a mariner is employed, the employer should determine if the mariner is competent in BST and indicate that fact on the mariner's training records. Further guidance on the responsibilities of the vessel's operator for maintaining training records may be found in Navigation and Vessel Inspection Circular 4-97, Guidance on Company Roles and Responsibilities Under the 1995 Amendments to the International Convention on STCW

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**Acting Commanding Officer** 

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