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NMC Policy Letter 09-02
14 June 2002

From: Commanding Officer, USCG National Maritime Center
To: Distribution

Subj: VALIDITY OF LICENSES FOR SERVICE ON VESSELS OF NOT MORE THAN 200 GROSS REGISTER TONS (GRT) VALID FOR SERVICE ON OCEANS

Ref: (a) Title 46, Code of Federal Regulations, Section 10.424
(b) International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW)

1. PURPOSE. This policy clarifies the application of the STCW to master's licenses valid for oceans service on vessels of not more than 200 GRT that are not engaged on near coastal voyages; i.e. an ocean voyage. This letter also provides general guidance for mariners who wish to qualify for a license valid for oceans service on vessels of less than 200 GRT/500 GT beginning 1 February 2002. Two hundred GRT is equivalent to 500 gross tonnage (GT) when the vessel's tonnage is measured in accordance with the International Tonnage Convention. This policy letter applies **only** to licenses that are issued (a) exactly at the 200 GRT level; **and** (b) before 1 February 2002.

2. ACTION.

- a. Commanding officers of units with a Regional Examination Center (REC) attached shall be guided by the information in this policy letter for the issuance of this license and an accompanying STCW endorsement.
- b. 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.
- c. This policy letter will be distributed by electronic means only. It is available on the World Wide Web at <http://www.uscg.mil/STCW/m-policy.htm>.

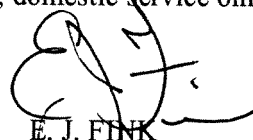
3. BACKGROUND.

- a. Reference (a) authorizes the issuance of licenses for service on vessels of not more than 200 GRT valid for service on oceans.
- b. Mariners who qualify for a license under reference (a) are not trained, tested, or assessed to the same standards that the STCW requires for a license at the 500 GT or more level.
- c. Reference (b) in regulation II/3 requires that officers on vessels of less than 500 GT, which is equal to 200 GRT, "not engaged on near coastal voyages" (ocean voyages) shall hold an appropriate certificate for service on vessels of 500 GT or more.

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4. DISCUSSION.

- a. A 200 GRT (500 GT) license issued in accordance with the domestic licensing scheme, reference (a), meets the tonnage requirements of the STCW because it falls into the STCW requirements of "500 or more" GT. However, the qualification requirements for that license are based on the former licensing scheme and do not meet the STCW's standards for certification as an officer on a vessel of 500 or more GT.
- b. Beginning 1 February 2002, RECs may continue to issue a master's license for ocean service on vessels not more than 200 GRT; however, under the STCW, the license may be used only for service on near coastal, domestic voyages or on ocean voyages on vessels not subject to the STCW (e.g. fishing vessels, certain public vessels, pleasure yachts, etc.). If a mariner wishes to be licensed for service on ocean going vessels of less than 200 GRT that are subject to the STCW, he or she must qualify for certification either as a master under STCW regulation II/2 or as an officer in charge of a navigational watch under STCW regulation II/1. The lowest tonnage licenses that meet those regulations are master and mate oceans of not more than 500 GRT. Guidance to qualify for those licenses and the accompanying STCW certifications are contained in other policy letters available on the web site.
- c. Mariners licensed as a master oceans not more than 200 GRT before 1 February 2002 may continue to be employed on ocean voyages if they hold a separate STCW-95 certificate endorsed for ocean service. They may qualify for a certificate valid for ocean service on non-lifeboat equipped vessels by completing gap-closing training in the four elements of basic safety training as well as bridge resource management. If they wish to serve on vessels equipped with lifeboats, they must complete the training and assessments related to that proficiency. If they are employed on vessels to which the Global Maritime Distress and Safety System applies, they must also have training in that system. If the vessel is equipped with ARPA, that training is also required. Mariners who do not complete GMDSS or ARPA training will have appropriate limitations noted on the STCW certificate. Proof of having completed advanced firefighting at some point in the mariner's career is also required.
- d. Mariners eligible for an STCW certificate under this policy letter must complete the gap closing requirements and file an application at an REC before 1 February 2003. Until the applicant qualifies for and is issued an STCW-95 certificate, he or she is limited to service on vessels of not more than 200 GRT engaged in near coastal, domestic service only.



E. J. FINK
Captain, U. S. Coast Guard
Commanding Officer
U. S. Coast Guard National Maritime Center

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