

Commanding Officer United States Coast Guard National Maritime Center 4200 Wilson Blvd. Suite 510 Arlington, VA 22203-1804 Staff Symbol: NMC-4B Phone: (703) 235-0004 FAX: (703) 235-1062

> 16721 NMC-4 Policy Letter 24-98

DEC 18 1998

From: Commanding Officer To: Distribution

Subj: APPLICATION OF THE INTERNATIONAL CONVENTION ON STANDARDS OF TRAINING, CERTIFICATION, AND WATCHKEEPING FOR SEAFARERS, 1978, AS AMENDED (STCW), TO ENGINEERING PERSONNEL

- 1. Most engineer licenses and MMDs authorize service on seagoing vessels. Applicants for these credentials must meet the STCW's requirements for training and practical demonstrations if they desire to qualify for an STCW endorsement form. If the STCW does not apply to their employment, they may continue to be licensed or certificated without meeting the STCW's requirements; however, appropriate limitations must be placed on any credentials that are issued.
- 2. The STCW applies only to seagoing vessels. The United States does not impose the STCW's requirements on mariners serving on vessels operating exclusively on the Great Lakes or other inland waters. In addition, engineers serving on seagoing vessels specified in 46 CFR 10.202(k) meet the intent of the STCW through the overall safety scheme applicable to such vessels, and those serving on vessels specified in 46 CFR 10.202(1) are exempt from the STCW. Licensed engineers may serve on those seagoing vessels without having an STCW endorsement form.
- 3. For engineering personnel who do not comply with the STCW, enclosure (1) provides information about the issuance of credentials to licensed engineers, and enclosure (2) provides similar information for qualified engineering ratings.
- 4. A mariner who elects to not comply with the STCW's requirements may later be at a disadvantage due to limited career growth and fewer employment opportunities. A mariner in this situation would then be required to fully comply with the STCW's requirements before he or she could be issued an STCW-95 form authorizing service on a seagoing vessel. This could prove difficult and costly. Personnel at Regional Examination Centers should caution any engineer who does not present evidence of meeting the STCW's requirements of the possible disadvantages and problems.
- 5. The United States considers the Great Lakes to be inland waters not subject to the STCW; however, the Canadian government will issue STCW forms to its mariners serving on Great Lakes vessels. It is our understanding that the Canadian government will not require mariners serving on U. S.-flagged vessels operating exclusively on the Great Lakes to hold an STCW

Subj: APPLICATION OF THE INTERNATIONAL CONVENTION ON STANDARDS OF TRAINING, CERTIFICATION, AND WATCHKEEPING FOR SEAFARERS, 1978, AS AMENDED, TO ENGINEERING PERSONNEL

form. If Canada begins to require STCW forms for these mariners, we will issue STCW forms valid for service limited to the Great Lakes only.

/s/

W. C. BENNETT By direction

Encl: (1) Application of the STCW to licensed engineers (2) Application of the STCW to qualified engineering ratings

Copy: Commandant (G-MSO)
All District (m) Offices
All COs, MSOs
All Coast Guard Activities
All RECs

2

APPLICATION OF THE STCW TO LICENSED ENGINEERS

WHO DO NOT MEET THE STCW'S REQUIREMENTS

IF AN APPLICANT HAS	AND APPLIES FOR	THEN THE APPLICANT	SHOULD BE ISS
Service or training before	original license	qualifies for an STCW-78 form**	STCW-78 form ar
1 August 1998			oceans (or near c
			for service on oce
			listed in 46 CFR 1
			endorsement, and
		III (OTOM 70 (**	vessels of any gro
Service or training before 1 August 1998	upgrade of a license based on that service	qualifies for an STCW-78 form**	Same as above
Service or training before 1 August 1998	renewal of a license	qualifies for an STCW-78 form**	Same as above
No service or training before	original license	does not qualify for any STCW form ***	a license endorse
1 August 1998			waters only on ve
			without further en
			and inland waters
No service or training before	upgrade of a license	does not qualify for an STCW form at the	STCW-78 form va
1 August 1998 applicable to	based on service	upgraded level. If the applicant was	granted and the li
the upgrade, but has a license based on service	occurring after 31 July 1998	eligible for an STCW-78 form at the level before the upgrade, the applicant	license) level, \ waters only on ve
before that date	1998	qualifies for continuation of that STCW	without further en
before that date		qualification until 1 February 2002.	and inland waters
		***(An upgrade from 3AE to 2AE is not	(original license
		considered a change in level by the	near coastal wate
		STCW. Treat this transaction as an	service only on or
		upgrade based on service before 1	in 46 CFR 10.202
		August 1998.)	for service on Gre
			any gross tons."
No service or training before	upgrade of a license	does not qualify for an STCW form	a license endorse
1 August 1998			waters only on sn
			10.202(k) and (l)
			Lakes and inland

^{*} The term "any gross tons" in the listed endorsements may be amended to 500 gross register tons to reflect restrictions that apply to designated duty engineers.

^{**} These mariners may be issued an STCW-95 form upon presentation of proof of competency in the four elements of basic safety training (STCW code A-VI/I), and qualification as proficient in the use of survival craft (STCW Code A-III). At that time, the endorsement on the license would by amended to delete the words "After January 31, 2002, valid...any gross tons." In lieu thereof, the standard endorsement(s) for which the applicant is eligible will be added to the license.

^{***} These mariners must meet all of the applicable STCW standards for demonstrations of competency and training as set forth in 46 CFR Part 10 and the STCW to qualify for an STCW-95 form.

APPLICATION OF THE STCW TO QUALIFIED ENGINEERING RATINGS

WHO DO NOT MEET THE STCW'S REQUIREMENTS

IF AN APPLICANT HAS	AND APPLIES FOR	THEN THE APPLICANT	SHOULD BE ISS
Service or training before 1 August 1998	initial watchstanding engineering rating(s)	does not require and is not eligible for an STCW-78 form. Qualifies for an STCW-95 form when proof of completion of the four elements of basic safety training (BST) is presented. May be eligible for relaxed proof of such training.*	an MMD endorse
Service or training before 1 August 1998	additional watchstanding engineering rating(s) to be endorsed on an MMD	does not require and is not eligible for an STCW-78 form. Qualifies for an STCW-95 form when proof of completion of the four elements of BST is presented. May be eligible for relaxed proof of such training.*	an MMD endorse
No service or training before 1 August 1998	any watchstanding engineering rating	is not eligible for an STCW-78 form. Does not qualify for an STCW-95 until proof of completion of formal training and/or assessment in the four elements of BST is completed and meets all applicable standards for demonstrations of competency and training for the rating as set forth in 46 CFR Part 12 and the STCW**	an MMD endorse further endorsem

Note: The watchstanding engineering ratings are oiler, fireman/watertender, junior engineer, deck engine mechanic, and engineman. These ratings are required to hold an STCW-95 form by 1 February 2002 for unrestricted service on seagoing vessels. The STCW form is endorsed for "Rating forming part of an engineering watch."

^{*} These mariners may be issued an STCW-95 form upon presentation of proof of competency in the four elements of basic safety training (NVIC 8-97).

^{**} These mariners must meet all of the applicable STCW standards for demonstrations of competency and training as set forth in 46 CFR Part 10 and the STCW to qualify for an STCW-95 form. They are not required to hold an STCW-78 form because ratings forming part of an engineering watch were not required to be certificated (issued an STCW form) under the 1978 Convention.