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16721 NMC-4 Policy Letter 5-99 March 26, 1999

From: Commanding Officer

To: Distribution

Subj: EVIDENCE OF COMPLETION OF BASIC SAFETY TRAINING (BST)

Ref: (a) Title 46, Code of Federal Regulations, Section 15.1105

1. Most mariners serving on seagoing vessels of 200 or more gross register tons, domestic tonnage, (GRT) (500 gross tons [GT] measured in accordance with the International Tonnage Convention) must produce evidence of competency in the four elements of basic safety training (BST) as required by reference (a). This requirement came into effect on 1 February 1997 when the 1995 amendments to the International Convention on Standards for Training, Certification, and Watchkeeping for Seafarers, 1978 (STCW), became effective. Any mariner who began his or her first sea service or training after 1 February 1997 must have already had evidence of completing BST to serve on a vessel to which the STCW requirements apply. Enclosure (1) provides guidance about compliance with the requirement for evidence of BST that applies to mariners who had seagoing service during the period from 1 February 1992 through 31 January 1997. Enclosure (2) is a summary of all of the existing methods of providing evidence of competency in BST.

- 2. The four elements of BST set forth in the STCW Code A-VI/1 consist of:
 - a. Personal survival techniques
 - b. Fire prevention and fire fighting
 - c. Elementary first aid; and,
 - d. Personal safety and social responsibility.

A mariner may have proved competency in each element of BST at widely different times, resulting in a different evidence of competency with a different expiration date for each element. To prove competency in BST *in toto*, the mariner must provide an acceptable evidence of competency covering each element. Each evidence is valid for five years from issuance. Valid evidence of competency in BST is required for issuance of an STCW-95 form and for employment on a seagoing vessel of more than 200 GRT.

Subj: PROOF OF COMPLETION OF BASIC SAFETY TRAINING (BST)

The assessment method with relaxed oversight announced in the preamble to the regulations that implemented the STCW (Federal Register dated 26 June 1997, page 34521) was extended by NMC-4 Policy Letter 12-98. It will be further extended until 31 December 1999 with two changes. First, the assessor must use the performance measures that were developed by the Merchant Marine Personnel Advisory Committee (MERPAC) for assessing a mariner's competency in each of the elements of BST. Copies of these measures are available on the World Wide Web at http://dms.dot.gov. Secondly, the assessor must hold a license valid for service on a seagoing vessel of 200 GRT or more and have at least 90-days service as a master or mate on such a vessel within the year prior to performing the assessments.

3. The Coast Guard requests comments about the appropriateness, effectiveness, and usefulness of the measures developed by MERPAC. Assessors are urged to provide this feedback by writing to Commandant, U. S. Coast Guard (G-MSO-1), 2100 Second Street SW, Washington, DC 20593. Questions on the performance measures should be directed to Mr. John Bobb of the National Maritime Center at (703) 235-8457 or jbobb@ballston.uscg.mil

W. C. BENNETT By direction

Encl: (1) Completion of BST for mariners with service prior to 2/1/97

(2) Table of acceptable evidences of completion of BST

Copy: All District Commanders (m)

Commandant (G-MSO)

All COs MSOs

All Activity Commanders

All RECs

EVIDENCE OF COMPLETION OF BST

FOR MARINERS WITH SEAGOING SERVICE DURING THE PERIOD

1 FEBRUARY 1992 THROUGH 31 JANUARY 1997

- 1. Title 46, Code of Federal Regulations (46 CFR), Section 15.1105(d) authorizes mariners who were employed at sea "immediately before 1 February 1997" to continue to serve at sea during the transitional period, 1 February 1997 through 31 January 2002, without having fully met the requirements for completion of BST. This exception is allowed only if the mariner meets the requirements for documentation of training and experience set forth in this enclosure and is only valid during the transitional period.
- 2. Any mariner who began his or her first sea service or training after 1 February 1997 must have already had evidence of completing BST to be signed on and sail on a voyage to which the STCW requirements apply.
- 3. We define the term "immediately before" to mean the five year period before 1 February 1997. If the mariner had service prior to 1 February 1992 and then did not serve on a seagoing vessel during the five-year period "immediately before 1 February 1997," the provisions of this enclosure do not apply. That mariner must be trained or assessed in BST before being employed in a position on a seagoing vessel subject to 46 CFR 15.1105.
- 4. A mariner may prove that service by a certificate of discharge (CD) which shows seagoing service at any time during the period 1 February 1992 through 31 January 1997. The service must have been on a seagoing U. S.-flag vessel which is required by regulation to have regular drills. These include Coast Guard inspected cargo and miscellaneous vessels, tank vessels, and passenger vessels and, in general, are vessels subject to 46 CFR Subchapter W. Because these vessels are required by regulation to hold weekly drills and exercises, service on them is accepted initially as meeting the STCW's requirements for BST. Service on uninspected towing vessels, or uninspected passenger vessels does not meet the service requirements.
- 5. Mariners may use a CD as evidence of BST competence while continuing to serve until 31 December 2000. After that, they must provide additional evidence of their continued competence. The additional evidence must demonstrate that they have participated in other structured exercises in addition to the required drills OR that they participated in other onboard safety training programs which provided feed back on their training and performance. The additional evidence may be a letter from the master or the employing company. A Record of Training book or a Coast Guard approved Training Record Book with entries to demonstrate this continued training in BST is also acceptable documentation if the book is maintained by or for the mariner and can be produced in a reasonable time.
- 6. Effective 1 February 2002, any mariner who used these transitional provisions for demonstrating competency in BST must have completed a formal Coast Guard approved training course (or courses) that covers the four elements of BST. The CDs, letters from masters, or letters from employers will not be accepted after 1 February 2002.

EVIDENCE OF COMPLETION OF BASIC SAFETY TRAINING

THE FOLLOWING EVIDENCE	AS AUTHORIZED BY*	IS VALID FOR	AND IS NOT VALID
1. Letter from master or company	NVIC 8-97, enclosure 1	5 years from the date of the letter	If dated after 1 August 1998
2. Course completion cert. from a Coast Guard approved training course in BST	46 CFR 10.205(l); 10.209(k); 12.05-3; or 12.153	5 years from the date of the course completion certificate	If issued or signed before the approval date of the course
3. Completed check-off list or equivalent document attesting to completion of the assessments of a mariner's skills in BST	NMC Policy letter 12-98	Each element for 5 years from the date of the assessment for that element	If completed after 31 December 1998
4. Completed check-off list or training record book attesting to completion of the assessments of a mariner's skills in BST	NVIC 4-97	Each element for 5 years from the date of the assessment for that element	Unless the company presenting the training and assessment has approved designated assessors to perform the assessments
5. Course completion certificate from a CG approved or Red Cross approved course in first aid and CPR	46 CFR 10.205(h) and this policy letter	For 5 years from the date of course completion in the first aid element of BST	Unless the course is approved
6. Course completion certificate from a CG approved course in basic fire fighting	46 CFR 10.205(g) and this policy letter	For 5 years from the date of course completion in the fire fighting element of the BST	Unless the course is approved
7. An approved Training Record with entries from approved course providers	NVIC 4-97	The completed element of BST and expires 5 years from the date it is completed	Unless the course is approved
8. Entry on a mariner's STCW form "Basic safety training completed(date)" Compared to the complete of the compared to the compa	NVIC 8-97	For 5 years from the date on the STCW form. That date will be the earliest date of the dates for all elements	If the STCW form has expired or if the BST completion date exceeds five years ago
9. Discharge proving some sea service during the period 2/1/92 through 1/31/97	46 CFR 15.1105(d) and this policy letter	Service until 12/31/00	Unless the mariner provides a certificate of discharge with service between 2/1/92 and 1/31/97
10. Discharge proving some sea service during the period 2/1/92 through 1/31/97 and proof of additional training	46 CFR 15.1105(d) and this policy letter	Service until 2/1/02.	Unless the mariner provides a certificate of discharge with service between 2/1/92 and 1/31/97 along with proof of additional training
11. Statement signed by a licensed officer that the seafarer has achieved competence in BST	Federal Register dated 26 June 1997 and this policy letter	For 5 years from the date of signature	If dated after 31 December 1999

^{*}This table is a general guide to the existing methods available to a mariner to provide evidence competence in BST. For further information or if questions arise about the validity of a proffered evidence of BST, consult the appropriate document for specific details.