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NMC Guidance Document No. 2-06

APR 17 2006

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

Subj: PHOTOGRAPHS FOR MERCHANT MARINER'S DOCUMENTS (MMDs) AND  
CERTIFICATES ISSUED UNDER THE INTERNATIONAL CONVENTION ON  
STANDARDS OF TRAINING, CERTIFICATION AND WATCHKEEPING, 1978, AS  
AMENDED (STCW)

Reference: (a) Title 46, Code of Federal Regulations, Section 12.02-9 (b)(1)

1. PURPOSE.

a. This document provides guidance on requirements governing the appearance of an applicant as shown in a photograph used on either an MMD or an STCW certificate. The guidance in this document will clarify the standards for issuance of credentials to mariners. 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.

b. The Coast Guard has a vital interest in ensuring that MMDs effectively identify mariners. Positive identification reduces threats to safety of life and property at sea and to the security of the United States.

2. ACTION. Commanding officers of units with marine safety responsibilities should be guided by the instructions included herein and bring this guidance document to the attention of the maritime industry with interests in the marine personnel field. This guidance will be distributed by electronic means only. It is available on the World Wide Web at <http://www.uscg.mil/stcw/index.htm>.

3. DISCUSSION.

a. Reference (a) provides the requirements for a photograph used on an MMD. Photographs must be of passport type. A guide to the standards that apply to passport photographs may be found at [http://travel.state.gov/passport/guide/guide\\_2081.html](http://travel.state.gov/passport/guide/guide_2081.html). The intent of reference (a) is to ensure that a photograph provides an accurate representation of the applicant. This allows the MMD to serve as an effective identification document. The regulation specifies that the head must be uncovered. That provision should be interpreted in light of the purpose of providing effective identification as well as an applicant's legitimate interests, such as religious or medical interests. An applicant may, for example, wear headgear or a full beard because of religious beliefs, or wear a wig

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or sunglasses while undergoing medical procedures. A photograph of an applicant with headgear, a full beard, a wig, or sunglasses may be accepted in such circumstances if the photograph provides effective identification of the applicant. Similar considerations may not apply to an individual who wishes to wear a head covering solely for vanity or personal reasons that do not rise to the level of a Constitutional or medical consideration; nor would they apply if the applicant's current facial appearance could not be ascertained (such as by a full cloth covering of the face, or no photograph at all). As a general rule, the photograph must accurately depict the applicant's current facial appearance.

b. An applicant who submits a photograph showing the applicant to be wearing headgear, a wig, sunglasses, or full beard should provide evidence demonstrating the applicant's legitimate interest. Such evidence may consist of letters from religious leaders supporting the applicant's position and letters from acquaintances, business colleagues, or friends attesting to the fact that the applicant constantly appears as he or she is shown in the photograph.

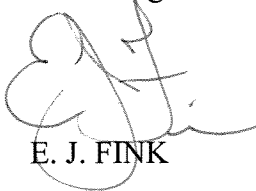
c. Any head covering should not conceal features critical to identification of the person, particularly the eyes, ears, or shape of the jaw.

d. The STCW certificate also requires that a photo be affixed. Most applicants provide the same photo for the STCW certificate that is used for the MMD. This guidance should be used for photographs on STCW certificates.

e. To provide uniformity, the decision to allow a photograph of an applicant with headgear, a wig, full beard, or other head covering will be made by the National Maritime Center. If a Regional Examination Center (REC) receives an application for an MMD or STCW certificate with such a photograph:

- (1) Request the applicant to provide the information listed in paragraph 3.b; and
- (2) Forward the information and a copy of the photograph to NMC-4C for evaluation.

f. An applicant who is denied the use of a photograph because he or she is wearing an item that obscures part of their identifying features, should be advised of the right of appeal in accordance with Title 46, Code of Federal Regulations, Subpart 1.03



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Copy: Commandant (G-PSO); Area Commanders (APp) (PPp);  
All District Commanders (p); All Sector Commanders; All COs, MSUs; All RECs