

STCW Frequently Asked Questions: General Questions

1. Is there a public red-line version available that puts the changes in context?

At this time, the Coast Guard does not intend to provide a red-line version of the Final Rule to the docket. All of the changes in the Final Rule are being made to the Electronic Code of Federal Regulations (ECFR), which may be accessed [here](#).

2. (ADDED 02/14/14**) If a required STCW training course certificate, such as one for basic training, expires during the 5-year validity period of the MMC, does this invalidate the MMC?**

No, the MMC will not be invalid. The proof of compliance for basic training will be on the MMC in the form of an endorsement which will be placed at the time of issuance and renewal. The Coast Guard intends to implement the basic training continued professional competence requirements by: (1) requiring the course completion certificate as proof that the mariner demonstrated the areas that must be refreshed ashore; and (2) requiring 1 year of sea service in the last 5 years as proof that the seafarer demonstrated the topics that can be demonstrated onboard the vessel.

3. (ADDED 02/14/14**) Does the STCW Convention apply on the Great Lakes? Can mariners gain sea service credit toward an STCW endorsement with Great Lakes service?**

The STCW does not apply on Great Lakes waters. While the Coast Guard is now granting credit toward near-coastal and oceans endorsements for Great Lakes service, that does not mean that the STCW is applicable on the Great Lakes.

4. (ADDED 02/14/14**) Merchant Mariner Credential (MMC) validity. When a mariner receives a new MMC, does their old MMC become invalid if it has not expired yet? Can a mariner sail using the old MMC?**

46 CFR 10.205(d) states that an MMC becomes invalid when it is renewed or reissued before its expiration date. Because it is invalid, a mariner cannot sail using it. The exception to this is a transaction only for MMC renewal that occurs within 8 months of expiration. The renewed MMC will be post dated so the issue date coincides with the expiration date of the active credential held by the mariner. See 46 CFR 10.205(a).

5. **(**ADDED 02/14/14**)** The revised definition of “near-coastal” includes text which reads, “This would also include those near-coastal waters identified by another Administration when the U.S. has entered into a treaty or an agreement with that country respecting the recognition of the U.S. near-coastal endorsement.” May we interpret this to mean that no U.S.-flag vessel may operate outside U.S. waters using U.S. credentialed personnel holding only a near-coastal endorsement?

No. The U.S. has received acceptance of our near-coastal endorsements by some foreign Administrations. In those Administrations’ near-coastal waters, the U.S. near-coastal endorsements may be used in accordance with each Administration’s port state control procedures.

We do not have a definitive list of those countries/Administrations that consider the U.S. near-coastal endorsements as being acceptable for service in such foreign coastal jurisdictions. All of the current informal agreements/understandings precede the 2010 STCW Amendments. In the near future, we intend to reach out to relevant administrations to ascertain the status of such mariners.

6. **(**ADDED 02/14/14**)** With the revised definition of “near-coastal,” many companies operating offshore supply vessels (OSVs) in the waters of a foreign nation will be unable to staff their OSVs with masters holding an oceans endorsement, thus creating a labor supply shortage. Will the Coast Guard allow time for these mariners to obtain oceans endorsements so that they may continue their careers? This delay in implementation would also give the Coast Guard time to enter into a treaty or an agreement with multiple countries to allow continuance of the current practice of operating OSVs on another nation’s near-coastal waters using mariners with U.S. near-coastal endorsements.

The U.S. has received acceptance of our near-coastal endorsements by some foreign Administrations. In those Administrations’ near-coastal waters, the U.S. near-coastal endorsements may be used. The responsibility for enforcement of another Administration’s near-coastal waters lies within their port state control procedures.

We do not have a definitive list of those countries/Administrations that consider the U.S. near-coastal endorsements as being acceptable for service in such foreign coastal jurisdictions. All of the current informal agreements/understandings precede the 2010 STCW Amendments. In the near future, we intend to reach out to relevant administrations to ascertain the status of such mariners.

7. **(**ADDED 02/14/14**)** Applicability of STCW Convention to barges. On page 77817, column 2, of the Federal Register final rule, the USCG states “This change is necessary because these barges operate beyond the boundary line and are, consequently, subject to the STCW Code and Convention”. This would mean that barges are subject to STCW and the personnel serving on barges are required to have the appropriate STCW endorsements. This is not true. 46 CFR 15.1101(a)(1)(iii) clearly states that barges are exempt from the STCW Convention. Was the intent to state that service as a tankerman on a barge may be counted toward service time for an “advanced tanker operations” endorsement, but that this would not change the applicability of STCW for those serving on barges?

Yes, you are correct. 46 CFR 15.1101 states that barges are exempt from the application of the STCW Convention. The Coast Guard included provisions in this final rule to allow mariners serving on tank barges to qualify for STCW endorsements with a limitation to non-self propelled vessels.

The Coast Guard will accept service onboard some ATBs toward the national and STCW endorsements provided that the ATB/ITB equipment is equivalent to comparable tankship equipment.

8. **(**ADDED 02/14/14**)** If someone has some sea service but no MMC, are they considered an existing mariner?

Yes. Mariners who have service or training prior to 24 March 2014, will be considered as existing mariners for grandfathering purposes. See NVIC 02-14.

9. **(**ADDED 02/14/14**)** STCW final rule availability. When will the changes in the final rule be published in the on-line versions of 46 CFR Parts 10, 11, 13, 14 and 15?

The contents of Part 10, Subpart C, which has an effective date of 24 January 2014, have already been entered in the ECFR. Where there are new sections in the final rule, and in existing sections affected by the final rule, there is a link to the final rule in the Federal Register. While the ECFR is managed by another agency, we anticipate that all changes to the ECFR will be completed by 27 March 2014.

10. (ADDED 02/14/14**) STCW terminology. What is the difference between a revalidation course and a refresher course and what decides which one the mariner needs?**

Under the new renewal requirements for basic training, advanced firefighting, proficiency in survival craft, and fast rescue boats, the Coast Guard uses the term “revalidation” for the course for mariners who must show continued competence and have at least one year of service in the past five. “Refresher” is used for the courses for mariners who do not have the 1 year of service in the past 5 years.

11. (ADDED 02/14/14**) MMC renewals. How will I provide “evidence of maintaining the standard of competence in advanced firefighting for renewal as described in 46 CFR 11.303(b)”?**

In order to meet the renewal requirements of advanced firefighting after 31 December 2016, you must satisfy the requirements of 46 CFR 11.303(c) and (d). 46 CFR 11.303(c) states that the Coast Guard will accept onboard training and experience, through evidence of 1 year of sea service within the last 5 years, as meeting certain listed requirements of the STCW Code. 46 CFR 13.303(d) and NVIC 09-14 list those areas of the STCW Code for which the Coast Guard will only accept evidence of assessments conducted ashore as meeting the requirements of paragraph (b).

12. (ADDED 02/14/14**) Is there a list of the 26 NVICs and their topics somewhere?**

You may find information on the NVICS [here](#). The Coast Guard intends to publish additional NVICs that provide assessments for deck and engineer endorsements at the management, operational, and support levels. Additionally, we will provide guidance for the following specialized areas: towing vessels; high speed craft; qualified assessor; security endorsements; tank vessels; and recognition of foreign certificates.

13. (ADDED 02/14/14**) Radar observer. Are all deck officers required to maintain radar observer endorsements?**

46 CFR 15.815 requires that all deck officers serving on vessels of 300 GRT or more and uninspected towing vessels which are equipped with radar must have a radar observer endorsement.

14. (ADDED 03/24/14**) Since the U.S. and Canada have an agreement respecting mutual recognition of national mariner qualifications, are mariners sailing between the U.S. and Canada only required domestic (national) endorsements on their merchant mariner credentials (MMCs)?**

Yes, the Memorandum of Understanding between the U.S. and Canada states that “...vessels trading between the United States and Canada will abide by the legislation for domestic (home-trade) voyages, of the nation in which they are registered while engaged in cross border trade...” Therefore, mariners sailing between the U.S. and Canada are only required to have domestic (national) endorsements on their MMCs, unless elsewhere required in the regulations.

15. (ADDED 07/07/14**) Awaiting Information (AI) letters: If a mariner submits an application prior to 24 March 2014 with a prerequisite missing for an officer endorsement, will he or she be issued an AI letter valid for 90 days as was done before the final rule?**

Yes, the final rule made no changes to 46 CFR 10.209(b). The Coast Guard may refuse to process an incomplete application; however, the Coast Guard intends to continue the practice of sending an AI letter valid for 90 days. Should the mariner be unable to satisfy the deficiencies noted in the AI letter, an extension may be requested.

16. (ADDED 07/07/14**) Awaiting Information (AI) letters: If a mariner has an AI letter issued prior to 24 March 2014 and requests an extension of the 90 days validity period, will he or she be granted one assuming that it meets the normal criteria for an extension request?**

Yes, there are no changes to the extension request process or NMC criteria for granting extensions to AI letters.

17. (ADDED 07/07/14**) Applicability: Does the STCW Convention apply to all seagoing vessels operating beyond the boundary line when engaged on international voyages? Are any vessels exempted from inclusion? What about those mariners with an endorsement as operator of uninspected passenger vessels (UPV) near-coastal 100 miles offshore, or as master 100 GRT up to 200 miles offshore who operate beyond the boundary line?**

The STCW Convention applies to all seagoing vessels as defined in 46 CFR 10.107, except those exempted by 46 CFR 15.105(f) and 46 CFR 15.1101(a)(1). Mariners serving on uninspected passenger vessels and small passenger vessels of not more than 100 GRT on an international voyage must meet the requirements of the STCW Convention, including holding both national and STCW endorsements as master or mate on a vessel of appropriate tonnage. However, 46 CFR 15.105(g) exempts mariners sailing on small vessels engaged on domestic near-coastal voyages from the requirements of the STCW Convention.

18. (ADDED 07/07/14**) Tonnages: Will the Coast Guard start using ITC instead of GRT?**

Yes. Beginning on 24 March 2014, the Coast Guard will begin using only ITC for STCW endorsements.

19. (ADDED 07/07/14**) Qualified Assessors: I've been searching for and not finding information on who can conduct onboard assessments for mariners. Is there a minimum license, STCW endorsement required to sign off on a mariner's assessments? Is there a policy document that you could refer me to?**

The Coast Guard developed NVIC 19-14 to provide guidance for qualified assessors and the assessment of STCW proficiencies. During the transitional period, those mariners currently allowed to complete assessments may continue to do so until 31 December 2016. The assessors must be in possession of the level of endorsement, or other professional credential, which provides proof that he or she has attained a level of experience and qualification equal or superior to the relevant level of knowledge, skills, and abilities to be assessed. For support and operational level assessments, the Coast Guard will generally accept an OICNW/EW with one year service as meeting this requirement.

20. (ADDED 07/07/14**) Applicability: Are all vessels greater than 200 gross register tons (GRT) subject to STCW even if they are less than 500 gross tonnage as measured under the International Tonnage Convention (ITC)?**

Yes, STCW is applicable to all vessels operating seaward of the boundary line; however, vessels less than 200 GRT on domestic, near-coastal voyages are not subject to any obligations for the purposes of the STCW Convention. (See 46 CFR 15.105 and 15.1101.)

21. (ADDED 07/07/14**) Applicability: Is a vessel of more than 200 GRT, with a Certificate of Documentation listing its registry as coastwise, subject to the STCW Convention while operating in inland waters?**

STCW is not applicable to a vessel if operating inside the boundary line.

22. (ADDED 07/07/14**) Application requirements: What has changed in the new regulations with regard to the oath and character references?**

The requirement for an applicant to submit letters of reference in the application package has been removed in these regulations. The requirement to take an oath still exists and was not changed in the new regulations.

23. (ADDED 07/07/14**) Do the requirements for an ECDIS endorsement apply to mariners serving on vessels to which STCW does not apply?**

No. ECDIS training and the associated endorsement are not required on vessels to which STCW does not apply. However, each crewmember must be familiar with the relevant characteristics of their vessel, including the proper operation of installed navigation equipment, as specified in 46 CFR 15.405.

24. (ADDED 07/07/14**) STCW endorsement renewal: I have maintained my national endorsement but have not renewed my STCW endorsement. How would I re-activate my STCW endorsement once it has expired beyond the grace period?**

You can re-activate your STCW endorsement by completing the gap closing requirements for your STCW endorsement as well as meeting the basic training requirements (46 CFR 11.302(e) or 12.602(e)).

25. (ADDED 07/07/14**) Do I need a quality standard system and if so, where do I find the requirements or guidelines for the manual?**

46 CFR 10.410 provides the requirements of a quality standards system for approved or accepted training on subjects required for STCW endorsements.

26. (ADDED 07/07/14**) Qualified assessors: Do course providers need to resubmit the resumes for their approved instructors to be qualified assessors?**

No. Approved instructors may conduct all assessments within the course(s) they are approved to instruct without further approval. However, if an instructor desires to be approved to conduct any other assessments, he or she will need to meet the qualification requirements for a qualified assessor.

27. (ADDED 07/07/14**) MMC officer endorsement eligibility: How can a mariner who is not a U.S. citizen convert his or her license issued by another Administration to a U.S. credential?**

Under the authority of Title 46 U.S. Code 7102, 46 CFR 10.221(a)(1), only individuals with valid U.S. citizenship may apply for officer endorsements, with the exception of individuals applying for endorsements as operators of uninspected passenger vessels which will be limited to service on undocumented vessels.

28. (ADDED 07/07/14**) Must a mariner hold a national endorsement in order to qualify for an STCW endorsement?**

Yes, 46 CFR 11.201(a) specifies that an applicant for any STCW endorsement must hold the appropriate national endorsement unless otherwise specified.

29. (ADDED 07/07/14**) 46 CFR 12.201(a)(1) states that all officer MMCs will be issued with entry-level ratings endorsed on them. From a legal standpoint this is wrong, because if an OUPV's MMC has ratings endorsements on it, this will allow the holder to work on vessels over 100 GRT, which would require that he or she keep their TWIC valid (per 46 CFR 10.203). Essentially the new 12.201(a)(1) voids the TWIC exemption policy issued in CG-543 Policy Letter No. 11-15 dated 19 December 2011.**

CG-543 policy letter 11-15 remains in effect. The policy letter exempts mariners without a valid TWIC who operate onboard vessels without a security plan from having to renew their TWIC. This includes uninspected passenger vessels of less than 100 GRT. Per the policy letter, a mariner holding or renewing one of these endorsements, and who previously held a TWIC, should include a written statement that they do not require a TWIC with their application. For more specific detail see CG-543 Policy Letter 11-15 found on the NMC website.

30. (ADDED 07/07/14**) If I renew my STCW endorsement before January 1, 2017, how long is my course completion certificate for the following approved training valid for:**

(a) leadership and managerial skills?

(b) electrical and electronic control equipment [46 CFR 11.325 (b) (3)]?

(c) engine resource management [46 CFR 11.325(b)(1)]?

The course completion certificates for these three courses are valid for 5 years. See NVIC 03-14, paragraph 5.a.

31. (ADDED 07/07/14**) Included endorsements on management level MMCs: My MMC currently has STCW and national endorsements as Chief Engineer of steam and motor propelled vessels. On my next renewal, will the STCW endorsements of OICEW, RFPEW, BT, Advanced firefighting, Proficiency in Survival Craft, and other endorsements be included automatically if I provide the appropriate sea service?**

Yes, MMCs are now being endorsed with all STCW endorsements for which the mariner is qualified. Until December 31, 2016, these endorsements will be automatically included at renewal if you have 12 months of sea service in the last five years. After that date, mariners must demonstrate continued competence through the appropriate combination of sea service and training. In addition, in order for your Chief Engineer STCW endorsement to be valid after December 31, 2016, you will need to complete training in leadership and managerial skills, engine resource management, and management of electrical and electronic control equipment.

32. (ADDED 05/27/15**) Why were new regulations applying to mariners on the Western Rivers hidden in the new STCW regulations? Since STCW doesn't apply to mariners on the Western Rivers, we don't read STCW proposals. Since these regulations were proposed in an area of regulations that don't apply, we were effectively denied an opportunity to comment on the proposed regulations.**

You were not denied an opportunity to comment on the proposed regulations. The Coast Guard published a Supplemental Notice of Proposed Rulemaking (SNPRM) on August 1, 2011, titled, "Implementation of the Amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, and Changes to Domestic Endorsements." The Coast Guard also issued a Press Release announcing the publication of the SNPRM. The public was given 60 days to comment on the proposed rulemaking. In addition, the Coast Guard held four public meetings, announced in the Federal Register, to discuss these regulations. All comments received from the public to the Federal Register docket and from members of the public at the four public meetings were considered in the promulgation of these final regulations. It should be noted that comments from the public were received concerning domestic endorsements.

33. (ADDED 05/27/15**) What is the difference between a refresher training course and a revalidation course?**

A revalidation course is for those mariners who have 1 year of service in the past 5 years (see 46 CFR 13.201(d)), whereas a refresher training course is for those who cannot meet the requirement for 1 year of sea service within the last 5 years. This latter group of mariners will be required to complete approved or accepted refresher training or meet the requirements of 46 CFR 13.302(a) (see 46 CFR 11.302(e)).

34. (ADDED 05/27/15**) For officers who elect to have their assessments signed off aboard ships instead of attending the approved upgrade courses, there are several places that indicate "COURSE" either in the assessment guidelines or in the assessment record. Does this indicate that the assessments cannot be done aboard and that a course must be taken?**

Yes, in every instance where a "COURSE" is noted in the assessment guidelines or assessment record, there is a required course for the endorsement that must include training and assessment relevant to the noted assessment.

35. (ADDED 05/27/15**) Do shipboard assessors need any special qualifications beyond those listed in Policy Letter 04-02: i.e., they must possess the license and STCW management level endorsement, read the Conducting Mariner Assessments publication, read the guidance in Policy Letter 04-02, and be sailing aboard the vessel with the mariner to be assessed?**

Those individuals conducting assessments before January 1, 2017, need only meet the requirements in NVIC 04-02. However, qualified assessors (QAs) after that date must be approved by the Coast Guard. Information on QAs is contained in NVIC 19-14, "Policy on Qualified Assessors." Information concerning the transition to Coast Guard approved QAs is also contained in the introductory text of Enclosure (2) to NVIC 10-14, and in other NVICs that include model assessments.

36. (ADDED 05/27/15**) Do assessments expire? Is there a time limit from when the assessments sign off begin to when they have to be complete or apply to take the upgrade exam?**

There is no time limit or expiration on shipboard assessments. However, if assessments have changed, the applicant would be required to meet the new assessments unless otherwise grandfathered. The Coast Guard will accept assessments from the outdated policy up to 6 months following their revision.

37. (ADDED 05/27/15**) Hours of rest: With regard to 46 CFR 15.1111(a), as long as a mariner has 77 hours of rest in a 7 day period, does he or she still have to have 10 hours of rest in a 24 hour period?**

Yes, both requirements must be met. However, in exceptional circumstances, the master of the vessel may authorize exceptions from these requirements. See 46 CFR 15.1111(j).

38. (ADDED 05/27/15**) Under the 2010 Amendments to the STCW Convention, are there any requirements for a mariner serving in the engine department to have any type of EPA certification? Type I, II, III or Universal?**

Under the Manila Amendments, there are no requirements for these endorsements. Additionally, under U.S. credentialing regulations, these certifications are not included.

39. (ADDED 05/27/15**) Alternative methods of proving competence: I have some concerns with the new assessments for NVICs on able seafarer-deck and some OICNW assessments. Some of those assessments stipulate that they can be done only on a vessel. Yet some vessels like OSVs and drill ships do not have the ability to conduct the assessment even if an approved assessor is onboard. Has the Coast Guard made allowances to solve these issues? I recommend that schools with the appropriate mockup be allowed to conduct assessments for those vessels that are unable to comply with the respective NVICs.**

In the final rule, the Coast Guard has taken a balanced approach to training requirements. These regulations specify those areas where “approved training” is required. In some instances, the regulations do not specify the type of approved training: classroom, training ship, e-learning, etc. In these cases, it is up to the industry, including training institutions, to submit their training for approval.

Additionally, your concerns have been forwarded to the MMCPolicy@uscg.mil for consideration in future revisions of the NVIC.

40. (ADDED 05/27/15**) ECDIS and ARPA Endorsements: Please provide clarification of the negative ECDIS & ARPA endorsements on the MMC. This is needed to clear up misunderstanding among Officer Unions, shipping companies and Masters believing that an endorsement of the ECDIS & ARPA are required to be in the MMC before joining an vessel.**

The regulations published on December 24, 2013, provide for endorsements consistent with the STCW Convention, which provides for a limitation for those officers who have not met the requirements for ARPA and ECDIS. As such, the limitation is more appropriate since it will be the exception to the rule.

41. (ADDED 05/27/15**) It is our understanding that in accordance with the regulations that only vessels over 100 GRT currently require a Merchant Marine Credential for unlicensed personnel, but at the same time the regulations state that STCW applies to vessels over 500 GT and that an applicant for any STCW endorsement must hold the appropriate national endorsement. Will all crew serving on a US flagged passenger vessel less than 100 GRT but more than 500 GT on an International Voyage be required to carry a U.S. Coast Guard-issued Merchant Mariner Credential (MMC)?**

As noted in 46 CFR 15.1101(a) – small passenger vessels subject to subchapters T or K are not subject to STCW when they are on a domestic voyages. Per 46 CFR 15.1101(b), the Coast Guard will provide an STCW endorsement for a single voyage of a non-routine nature. If routinely on international voyages, STCW endorsements would be required.

42. (ADDED 05/27/15**) For small passenger vessels routinely operating on international voyages, will a Deckhand need an endorsement as an “Ordinary Seaman” or “AB Limited” to qualify for an STCW endorsement as a “RFPNW” and a Rating as a “Wiper” to qualify for an STCW endorsement as a “RFPEW”? And will the Hotel Department be required “Steward (F.H.)” endorsements if they are listed on the safety billet? If not, will certificates of course approved course completion attached to the crewman’s company issued training record suffice? If not, will crew still be required to have a yearly physical and be issued a Medical Certificate?**

Those mariners serving in a watchstanding positions would be required to hold an endorsement as OS and RFPNW or wiper and RFPEW. There is no requirement to hold an endorsement as stewards department (food handler) on small passenger vessels. Additionally, those persons serving in safety and environmental protection positions would require basic training. This training will either be documented as an endorsement on a credential or if no credential is issued the vessel will need to carry the documentary evidence. Mariners must also meet the security requirements in 46 CFR 15.1113. These requirements will either be documented as an endorsement on a credential or if no credential is issued the vessel will need to carry the documentary evidence.

Finally, a credentialed mariner must hold a medical certificate as identified in 46 CFR 10.302.

43. (ADDED 05/27/15**) Will the requirement of the MMC trigger TWIC requirements for positions that would not normally require them of a domestic voyage? (Note: TWIC is a U.S. Regulation only and not required by foreign flag state.)**

Mariners serving on an international voyage are required to hold a TWIC per 33 CFR 101.514.

44. (ADDED 05/27/15**) Near-coastal Voyages: With the change in the definition of “Near-Coastal voyage,” will Masters and Mates on international voyages be required to have Ocean Endorsements if a Near Coastal endorsement is not recognized by the foreign flag state?**

If a foreign administration does not have near coastal waters, or does not accept the U.S. near coastal endorsements, a mariner sailing in that administration’s waters must hold an endorsement authorizing ocean service.

45. (ADDED 05/27/15**) The revised definition of “near-coastal” includes text which reads: “This would also include those near-coastal waters identified by another administration when the U.S. has entered into a treaty or an agreement with that country respecting the recognition of the U.S. near-coastal endorsement.” May we interpret this to mean that no U.S.-flag vessel may operate outside U.S. waters using U.S. credentialed personnel holding only a near-coastal endorsement?**

No, that would not be an appropriate determination; however, the United States will need to be aware of those near coastal waters of another administration in which U.S. vessels choose to operate. These administrations may not have designated near coastal waters or may not encompass the same distance from shore as the U.S. has from our shore.

46. (ADDED 05/27/15**) Does the signature of a QA obtained prior to December 31, 2016, become null and void after that date if the student has not completed all requirements and submitted their application to NMC?**

In order to allow the applicant time to complete all of his or her assessments in a timely fashion and still receive credit for assessments completed by non-approved QAs before January 1, 2017, the Coast Guard will accept those assessments until June 30, 2017. All assessments completed on or after January 1, 2017, must be signed by an approved QA.

47. (ADDED 05/27/15**) STCW applicability: Do the STCW regulations apply to port relief engineers and day maintenance engineers? These mariners are reliefs dispatched out of the union hall, usually for 8-hour shifts, but on occasion it could be a lot longer. However, the jobs never last more than 40 hours.**

No. The STCW regulations apply to mariners working on vessels which are operating beyond the boundary line of the United States. However, the owner or operator of a particular vessel may impose additional requirements.

48. (ADDED 07/22/15**) USCG Approved Towing Vessel Designated Examiners, qualified and approved for Oceans/Near Coastal TOARs and required to hold STCW endorsements for vessels under 200 GRT on foreign voyages or vessels over 200 GRT on domestic coastwise/foreign voyages, do not receive any recognition for approval as Qualified Assessors. They ALL have to reapply!**

It has been fine that these mariners have been completing TOAR competencies and onboard STCW competency sheets prior to 03/24/2014 for RFPNW or OICNW while maintaining the highest order of marine safety in training. But now they have to reapply to become a QA or stop assessing STCW competencies after 12/31/16.

What has changed in their skill sets that causes them to have to reapply to perform a task that they have been performing for both towing vessel officer candidates and those (some of whom are the same individuals) seeking STCW endorsements prior to 03/24/14?

As a compromise, I would suggest grandfathering current Oceans/ Near Coastal designated Examiners to Qualified Assessors for vessels "500 GT or more and less than 3,000 GT Management Level or operational level - 46 CFR 11.311, 11.309".

This is the new STCW endorsement level required for Towing Vessel Masters required to meet STCW Code.

A designated examiner, in order to become a qualified assessor after December 31, 2016, must be approved by the Coast Guard after demonstrating they meet the qualification requirements. This is consistent with the regulations published in 46 CFR 10.405. The designated examiners will likely meet the requirements for qualified assessors; however, they will need to be evaluated whether they meet the requirements to conduct STCW assessments.

For more information regarding obtaining approval as a qualified assessor, see NVIC 19-14.

49. (**ADDED 09/15/15**) STCW Requirements for Uninspected Passenger Vessels. I am writing to inquire about the STCW code pertaining to Uninspected Passenger Vessels.

I have found your Navigation and Vessel Inspection Circular 08-14. Does this apply to Uninspected Passenger Vessels (UPVs)? I am a captain of a pleasure yacht which charters with a maximum of six paying passengers. I am trying to figure out the STCW Basic Training requirements for this vessel.

The STCW Convention applies to all seagoing vessels as defined in 46 CFR 10.107, except those exempted by 46 CFR 15.105(f) and 46 CFR 15.1101(a)(1). Mariners serving on UPVs and small passenger vessels of not more than 100 GRT on an **international** voyage must meet the requirements of the STCW Convention, as implemented with the U.S. regulations, including holding both national and STCW endorsements as master or mate on a vessel of appropriate tonnage. However, 46 CFR 15.105(g) considers mariners sailing on small vessels engaged **exclusively on domestic near-coastal** voyages compliant with the manning requirements for vessels subject to the STCW Convention.

Individuals holding an endorsement as Operator of Uninspected Passenger Vessels are not authorized to operate UPVs on an **international voyage**, see 46 CFR 11.467 (b).

STCW Frequently Asked Questions: Grandfathering, Transition, Effective Dates

- 1. Can mariners already in the system choose to be evaluated under the new requirements when it benefits them prior to January 2017? It is my understanding that they have a choice.**

The grandfathering provisions found in 46 CFR 11.301(g)(3) for STCW officer endorsements are an important part of this Final Rule. They permit mariners who commence service or training before March 24, 2014, to use the existing requirements until January 1, 2017, if they choose. The changes to the national credentials will be phased in over a 5-year period starting March 24, 2014, consistent with the Coast Guard's normal approach to implementing credentialing rules.

- 2. Do I have to wait for these regulations to take effect on March 24, 2014, or can I ask to be evaluated under the new regulations now?**

Mariners who have service or training before March 24, 2014, may elect to be evaluated under all of the requirements of the new rules. However, such evaluations will not be conducted until after March 24, 2014. This will allow a period of time for the Coast Guard to fully prepare for the implementation of the Final Rule.

- 3. As I am reading through Subpart C – STCW Officer Endorsements 11.301(g)(2), it appears that “EXCEPT AS NOTED BY THIS SUBPART,” anyone who currently holds an STCW officer’s endorsement prior to March 24, 2014, will not be required to complete any additional training required under this part to retain the endorsement until January 1, 2017. Does this also exempt them from the requirement to have 1 year of sea service in the last 5 years, AND demonstrate continued professional competence by approved assessments conducted ashore for “11.302 (b) Basic Safety Training,” “11.303 (b) Advanced Fire Fighting,” and “12.613 (b) Proficiency in Survival Craft” until after 1 January 2017?**

Until January 1, 2017, mariners may provide evidence of having maintained the minimum standards of competence in basic training (formerly named basic safety training) by complying with 46 CFR 11.202(b) of the regulations in effect before publication of this Final Rule or documenting 12 months of service within the last 5 years. After January 1, 2017, mariners must provide evidence of maintaining the standards of competence in basic training, advanced firefighting, and proficiency in survival craft and/or fast rescue boats every 5 years.

4. Is March 24, 2014, the date when engineers holding valid STCW operational-level endorsements need to take courses in order to upgrade to management-level endorsements?

Applicants who apply for management-level engineer endorsements and who began their service or training before March 24, 2014, will not have to provide evidence of taking leadership & managerial skills training until January 1, 2017. If the applicant begins training or service on or after March 24, 2014, he or she will have to comply with the requirements in 46 CFR 11.327.

5. Transition period. Rear Admiral Servidio's December 24, 2013, announcement of the final rulemaking action states, "The opportunity to use the requirements in effect before March 24, 2014, will only be available for one transaction during the STCW or national transition period." I was not able to find that "one and done" limitation specified in the transitional provisions of 11.301(g) or other references to grandfathering in the rules. How is that restriction going to be publicized and enforced?

Information on the transition will be published in the forthcoming NVIC 02-14 on grandfathering and transitional provisions for merchant mariner credentials.

6. (ADDED 02/14/14**) Do mariners who hold an STCW endorsement issued before 24 March 2014, have to complete any additional training before 1 January 2017.**

Mariners seeking to renew an STCW endorsement to be valid on or after 1 January 2017 may be required to complete training in order to ensure they do not receive a limitation. Not all endorsements require additional training; please see NVIC 02-14 for a listing of required training for your endorsement.

7. (ADDED 02/14/14**) Does NVIC 02-14, "Grandfathering and Transitional Provisions for Merchant Mariner Credentials," apply to all tankermen or only seagoing tankermen?**

There are specific provisions in enclosure (1) of NVIC 02-14 that pertain to all tankermen, as well as provisions in enclosure (2) for those tankermen to which STCW applies.

8. **(**ADDED 02/14/14**) Endorsement as Master, less than 500 GT. Under the regulations in effect prior to 24 March 2014, a mariner who currently holds a national endorsement for service on vessels of 100 GRT or 200 GRT can upgrade directly to an international 500GT/1,600 GRT master's endorsement. However on or after 24 March 2014, existing mariners will have to comply with Table 1 to 46 CFR 11.311(d) in order to obtain the endorsement. Can mariners continue to apply under the regulations in effect prior to 24 March 2014, until 31 December 2016, or will they be required to comply with the new regulations on or after 24 March 2014?**

Candidates who apply for an endorsement based on approved or accepted training or approved seagoing service that was started before 24 March 2014, may qualify under the requirements existing before that date. This includes the assessments published prior to 24 March 2014, as well as the additional requirements for the STCW endorsement section. See NVIC 02-14.

9. **(**ADDED 07/07/14**) STCW Gap Closing Training: Please clarify how a mariner calculates what is their personal deadline to complete the two types of new STCW training - the "Gap Closing" courses such as "Leadership" and the refresher courses such as "BT"?**

The gap closing requirements are specified under the individual requirements for a credential to be valid after 1 January 2017, as described in the regulatory changes that will enter into force on 24 March 2014. Mariners who do not meet the gap closing requirements at the time of application will be issued an STCW endorsement not valid after 31 December 2016. However, the Coast Guard is cognizant that there are mariners whose credentials were issued before 24 March 2014 without limitation. These mariners will be required to meet the gap closing requirements at the next renewal.

10. **(**ADDED 07/07/14**) Will the USCG accept completion of a USCG approved Bridge Resource Management or Engine Resource Management course along with 6 months of sea time as Officer in Charge of the Navigational or Engineering Watch following completion of the course as evidence of meeting the standard of competence in leadership and team work for existing mariners who have an STCW credential issued before 24 March 2104?**

In order to be accepted as meeting the requirements for Leadership and Teamworking Skills, a course must be specifically approved as having met the standard of competence in Sections A-II/1 and/or III/1 of the STCW Code.

NOTE: Please note that the requirement in Leadership and Teamworking Skills is to demonstrate the standard of competence, and it is not necessary to complete approved training. Accordingly, this can be accomplished by a shipboard assessment by a Qualified Assessor. The recently published NVICs for OICNW and OICEW include the assessments for Leadership and Teamworking Skills. Mariners who hold OICNW or OICEW that must demonstrate competency in Leadership and Teamworking Skills for their endorsements to be valid after 31 December 2016 may do so by completing the corresponding OICNW or OICEW assessments.

11. (ADDED 07/07/14**) What constitutes training? It is clear that students who started training before or after 24 March 2014 fall into certain categories, but what constitutes training? When a mariner started collecting seetime towards a license or an upgrade and spends time on the bridge for in-house training? When a mariner started the KUP's? When a mariner went to school? When a mariner submitted for an upgrade?**

Training is considered Coast Guard approved or accepted training as indicated in 46 CFR 11.301(g). A mariner will be considered to have started service on the first day of their service that meets the requirements for the endorsement they have applied for. Training is considered to have started on the first day of the approved or accepted training used to qualify for an endorsement.

12. (ADDED 07/07/14**) Regarding the grandfathering and transitional provisions of 46 CFR 11.301(g) and NVIC 02-14, can an existing mariner who is required to complete gap closing requirements, with a limitation causing their credential to expire on 31 December 2016, submit their gap closing requirements after 31 December 2016 and have the limitations removed and validity of their credential extended to the 5 year expiration date of the current MMC?**

Yes. The STCW endorsement will become valid until the expiration of the MMC once the Coast Guard receives documentation of completion of the gap-closing requirements. (See 46 CFR 11.301(f)(2).)

13. (ADDED 07/07/14**) I hold a national 1,600 GRT near-coastal mate's endorsement, with no STCW endorsement. I reviewed the checklist on the NMC website for the STCW version of Mate (500 GT or more operational level), which I qualify for. Since my sea time was obtained before 24 March 2014, which requirements would be for me?**

Because your sea service commenced before 24 March 2014, you should meet the following from the checklist: “general requirements”; “sea service requirements”; “competencies” found in CG-543 Policy Letter 11-07; and “other requirements (all applicants).”

14. (ADDED 07/07/14**) Regarding the grandfathering and transitional provisions of 46 CFR 11.301 (g) and NVIC 02-14, does a mariner who qualifies for a credential (i.e., STCW management level credential) based upon service or training prior to 24 March 2014 have to have successfully completed all Coast Guard examinations by 1 January 2017?**

No. If a mariner in this situation has met all other application requirements (including STCW) and has been approved to test for the national endorsement, he or she would be examined under the regulations at the time he or she is approved to test, until 24 March 2019 when the transitional provisions for the national endorsement ends.

15. (ADDED 07/07/14**) Renewal of STCW officer endorsement: If a management level officer has sea service that began before 24 March 2014, must he or she complete the ERM/BRM and leadership and management courses when renewing his or her endorsement before 1 January 2017?**

No. However, those mariners seeking a renewal will receive a limitation on their endorsement indicating that it will not be valid after 31 December 2016.

16. (ADDED 07/07/14**) Regarding the grandfathering and transitional provisions of 46 CFR 11.301 (g) and NVIC 02-14, can a mariner with an OICNW/third mate unlimited endorsement with no training towards the STCW management level endorsement before 24 March 2014, and who upgrades to an endorsement as OICNW/second mate unlimited after that date, then upgrade to chief mate unlimited (STCW deck management level) using the previous regulations or will he or she be required to upgrade using the new regulations, provided it is done by 1 January 2017? Will other options be available under future NVICs? We believe the sea time as OICNW before 24 March 2014 enables the mariner to take advantage of the grandfathering and transition provisions under the new regulations.**

Generally, a mariner must have obtained at least one day of qualifying service for the endorsement you are seeking before 24 March 2014, or have begun at least part of the training required for the endorsement you are seeking before that date in order to be eligible for grandfathering under the previous regulations. In the case of a mariner with a national officer endorsement as second mate of unlimited tonnage who wishes to upgrade to chief mate of unlimited tonnage, 46 CFR 11.405(a) specifies that all sea service to qualify for chief mate must be obtained while holding an endorsement as second mate. Accordingly, if a mariner upgrades to second mate after 24 March 2014 he or she would not be eligible for grandfathering if they later upgrade to chief mate, and will be evaluated for chief mate under the new regulations.

17. (ADDED 07/07/14**) I hold a national chief engineer (limited) and STCW endorsement. As I read the new regulations, if I renew before 1 January 2017 I do not have to take the engineroom resource management, leadership and managerial skills, or management of electrical and electronic control equipment courses until my next renewal after 1 January 2017. Is that correct?**

No, you must complete the training in order for your STCW endorsements to remain valid after 31 December 2016. If you renew before 1 January 2017 and have not completed the training, your endorsement will have the limitation “not valid after December 31, 2106” placed on it. See 46 CFR 11.325 or 11.331 as applicable.

18. (ADDED 07/07/14**) Assessments for STCW endorsements: In most of the new NVICs, it says, “Mariners who began training or service for an endorsement as xxx before 24 March 2014 will not be required to provide assessments until 1 January 2017.” Does this mean that an application must be submitted before 1 January 2017, or that the application must be completely evaluated, testing completed and the MMC issued before that date?**

A complete application must be submitted prior to 1 January 2017. See 46 CFR 10.209, 10.225, and 10.231. The Coast Guard may refuse to process an incomplete application. See 46 CFR 10.209(b). If a complete application is not submitted prior to 1 January 2017, all STCW requirements of the new regulations must be met. If the application and associated STCW documentary evidence has been submitted in time and the Coast Guard has not completed the evaluation the applicant will not be held responsible to meet the new requirements for the STCW endorsement. The examinations fall under the requirements for national endorsements and fall under the same 5-year transitional period.

19. (ADDED 05/27/15**) With regard to the new STCW requirement to complete approved training in leadership and managerial skills, I have held an STCW endorsement as master on vessels of 3,000 GT or more since 2003. Does service prior to March 24, 2014, grandfather me from having to complete this training? Would leadership training completed in a company training program exempt me from this requirement?**

No, service before March 24, 2014, does not exempt you from this or any other training required for renewal of your STCW endorsement. In order for your company training program on leadership and managerial skills training to be accepted, it would need to be Coast Guard-approved. Course providers may seek to have their courses retroactively approved to meet the new regulatory requirement. You may check the NMC’s approved course listing to see if your course provider has received retroactive approval for its course.

20. (ADDED 05/27/15**) Why would an OICNW or OICEW endorsement have the limitation “Not valid after December 31, 2016”?**

The final rule add a requirement for all OICNWs (46 CFR 11.309(c)(1)) and OICEWs (46 CFR 11.329(c)) to demonstrate having met the standard of competence for “Leadership and Teamworking Skills” in order for the endorsements to be valid after December 31, 2016. Mariners who have not documented that this standard of competence has been met will receive a limitation indicating that the OICNW or OICEW endorsement is not valid after December 31, 2016. This limitation may be removed at any time by demonstrating the applicable standard of competence, either by completion of a Coast Guard-approved course, or by completing the applicable shipboard assessments specified in NVICs 12-14 or 17-14. In addition to the requirement for Leadership and Teamworking Skills, OICEWs must also complete an approved course for Engine Room Resource Management (also in 46 CFR 11.329(c)) in order for the OICEW endorsement to be valid after December 31, 2016.

21. (ADDED 05/27/15**) How can a mariner have a limitation removed on an STCW endorsement that indicates it is “Not valid for service on ECDIS equipped vessels after December 31, 2016”?**

The limitation may be removed at any time by showing successful completion of a Coast Guard-approved ECDIS course (see 46 CFR 11.301(f)(2)).

22. (ADDED 05/27/15**) If a mariner is in possession of an ECDIS training certificate that states: “successfully demonstrated competencies of table A-II/I and A-II/2 of the STCW code,” is this acceptable for them to get the ECDIS limitation removed from their MMC?**

Yes. The course completion certificate from a Coast Guard-approved or Coast Guard-accepted ECDIS course is sufficient to remove the limitation on the MMC. We will recognize a course completion certificate from any Coast Guard-approved or Coast Guard-accepted ECDIS course, including those approved or accepted and completed prior to publication of the final rule.

23. (ADDED 05/27/15**) Can someone who is starting their assessments now use Policy Letter 04-02 as long as the assessments are completed by December 31, 2016?**

Yes. Enclosure (4) of NVIC 10-14 describes how a combination of assessments from that NVIC and the former policy letter may be used until December 31, 2016. Similar provisions are also contained in NVICs for other credentials. The Coast Guard will continue to accept assessments from the outdated policy completed before December 31, 2016 until June 30, 2017.

24. (ADDED 05/27/15**) I hold a license and STCW endorsement as chief engineer (limited oceans) and second assistant engineer (unlimited). What are the requirements in order to transition an STCW endorsement as chief engineer (limited) to chief engineer (unlimited)? Will I be covered for STCW requirements for future upgrades including, but not limited to, first assistant engineer (unlimited) (second engineering officer), assuming I've also completed BT/Fire Fighting/PSC, etc.?**

If you meet the gap closing requirements found in 46 CFR 11.325(b), your STCW Regulation III/2 endorsement as chief engineer (management level) will remain unchanged. If you have limitations on your STCW endorsement, you will have to complete the outstanding items to remove that limitation. Once you hold an STCW endorsement for Regulation III/2, you will not have further upgrades required for your STCW endorsement.

Those engineers who currently hold a management-level endorsement and started training or service towards the STCW endorsement before March 24, 2014, need only meet the requirements found in the regulations, policy, and practice existing before that date.

However, 46 CFR 11.201(a) requires that you must have the underlying national endorsement in order to serve on vessels of unlimited tonnage. After December 31, 2016, all applicants must meet current requirements found in regulations regardless of when service and training started.

25. (ADDED 05/27/15**) Endorsement renewals: To reinstate a license in the past, mariners were required to take a full course or took a U.S. Coast Guard examination. Recently, I was told that I would also have to submit proof of 90 days of recency and a current CPR/FA card. How does someone reinstating their 1600 GRT endorsement show recency on appropriate tonnage vessels if they don't have an MMC that allows them to work on the vessel?**

During the grandfathering and transitional period, the Coast Guard will be using the previous practice for renewal of an MMC after the grace period. That practice recognized the requirements in 10.227(i) and modifies the professional requirement for renewal to require complete examination or training in order to qualify for the MMC - vice the service. Considering that the previous regulations and the current regulations do not have a professional requirement for sea service, the Coast Guard will not be requiring the recent service in 11.201 (c)(2) but will continue the practice of full course or examination.

26. (ADDED 05/27/15**) I currently hold an OICNW endorsement and am planning on upgrading to Master of Less Than 3,000 GT, but will not have the sea time I need until after 2017. I understand that there are new STCW renewal requirements for Basic Training, Advanced Fire Fighting, Proficiency in Survival Craft, and Fast Rescue Boats that will take effect on the first renewal of an MMC after December 31, 2016. My current MMC is due to expire in 2019. Will I need to meet these new renewal requirements when I seek the raise of grade of my STCW endorsement after December 31, 2016, but before my MMC expires in 2019?**

Yes, you must produce evidence of maintaining the standard of competence every 5 years of BT, Advanced Fire Fighting, Proficiency in Survival Craft, and Fast Rescue Boats when you upgrade an endorsement after January 1, 2017, but before the first renewal after that date. 46 CFR 11.302(b) and the STCW Convention require that mariners shall be required, every 5 years, to produce evidence of having maintained the required standard of competence for Basic Training.

27. (ADDED 05/27/15**) I am due to renew my 1600 GRT master's endorsement in 2016. Do I have to take all the new renewal courses mid-issue or do I just need it for my next renewal in 2021?**

There are different requirements that affect your renewals.

If you renew before January 1, 2017, and do not have approved training for Leadership and Managerial Skills, your STCW endorsement will receive a limitation making it not valid after December 31, 2016. Also, if you have not completed training for ECDIS, your STCW endorsement will have a limitation indicating that it will not be valid on vessels equipped with ECDIS after December 31, 2016.

There are also renewal requirements that take effect on the first credential transaction after December 31, 2016. At that time you will need to show continued competency for Basic Training, Advanced Fire Fighting, Proficiency in Survival Craft, and Fast Rescue Boats. If you have 1 year of service during the previous 5 years, you can take shorter "Revalidation" courses. If you do not have this service, you will need longer "Refresher" courses.

28. (ADDED 05/27/15**) I understand that there are new renewal requirements for Basic Training, Advanced Fire Fighting, Proficiency in Survival Craft, and Fast Rescue Boats that will take effect the first time that I renew my STCW endorsements after December 31, 2016. I also understand that when renewing, I may request that my new MMC be dated up to 8 months in the future to align with the expiration of my current MMC. May I defer the new STCW renewal requirements by applying for renewal before January 1, 2017, and requesting that my new MMC take effect after that date?**

Certain STCW requirements must be met by January 1, 2017, or the first renewal thereafter. If you request delayed issuance of your MMC that falls after that date, the STCW requirements cannot be deferred. These requirements include: continued competency for Basic Training, Advanced Fire Fighting, Proficiency in Survival Craft and Fast Rescue Boats, Approved training in Leadership and Managerial skills or the assessment of competence of Leadership and Teamworking skills and ECDIS if serving on vessels with that equipment.

29. (ADDED 05/27/15**) Teamwork and Leadership Skills: The USCG is allowing existing 2nd and 3rd assistant engineers to meet the standard of competence in leadership and teamworking skills by completing tasks 16.1A, 16.2A, 16.3A, and 16.4A in the OICEW record of assessment. Will the mariner be able to submit just those sections of the record of assessment and a certificate for an ERM course to have the Dec 31st, 2016, expiration removed from the STCW-95, or will the mariner need to turn in a fully completed OICEW record of assessment and an ERM course certificate?**

Yes, you need only submit proof of Leadership and Teamworking Skills assessments and proof of satisfactory completion of an ERM course in order to extend the validity of your OICEW endorsement past December 31, 2016. It should be noted that ERM and Leadership and Teamworking Skills are two separate requirements.

30. (ADDED 05/27/15**) I hold an endorsement as Master 100 Tons and just renewed my MMC. I took Basic Safety Training in the past, and my old MMC said that I met STCW for domestic voyages. Why is that not on my new MMC?**

The Coast Guard no longer includes this endorsement where a mariner is only seeking authority for domestic, near-coastal voyages. The Coast Guard clarified the regulations for those persons operating small vessels engaged exclusively on domestic, near-coastal voyages since they are not subject to any further obligation for the purposes of the STCW Convention. Additionally, the Coast Guard has provided regulations outlining how to obtain an STCW endorsement for near-coastal endorsements, see 46 CFR 11.317.

31. (ADDED 05/27/15**) I have both a Master 3,000 ton endorsement and a 3rd Mate OICNW endorsement. I was informed by the NMC that for my STCW to stay valid after Dec 2016, I would have to complete two courses: Leadership and Managerial skills, and Leadership and Teamworking Skills. Investigating further, I have read that if an individual takes the Leadership and Managerial skills course, that this satisfies the Leadership and Teamworking Skills STCW requirement for OICNW. Is this true?**

You are correct. If you are renewing your endorsements and have successfully completed the Leadership and Managerial Skills course, you do not have to meet the standard of competence for Leadership and Teamworking skills.

32. (ADDED 05/27/15**) It is my understanding, based on information found in enclosure (2) of NVIC 12-14, that the assessments for OICNW pertaining to application of Leadership and Team Working Skills can be substituted for an approved training course. It is also my understanding that, until December 31, 2016, anyone holding a master's endorsement and serving as an OICNW is qualified to perform the assessments. Is this correct? See 46 CFR 10.405(a)(3).**

In order to facilitate the transition to the new requirement for approval of qualified assessors, the Coast Guard will accept assessments that have been demonstrated in the presence of and signed by an assessor who has not been Coast Guard approved provided that the assessor meets the professional requirements in 46 CFR 10.405(a)(3) to assess competence for the specific endorsement. During this interim period, assessors must be in possession of the level of endorsement, or other professional credential, which provides proof that he or she has attained a level of experience and qualification equal or superior to the relevant level of knowledge, skills, and abilities to be assessed (46 CFR 10.405(a)(3)). Until December 31, 2016, the Coast Guard will accept assessments signed by mariners who hold an appropriate national endorsement and meet the qualifications described in enclosure (2) of NVIC 12-14.

33. (**ADDED 09/15/15**) The NVICs clearly state that the STCW endorsement is not valid without completing the gap closing courses after December 31, 2016. We are deeply concerned with inconsistencies in interpretation and how some mariners and organizations may use this as an opportunity to extend the deadline for compliance with STCW 2010 and completing the gap closing requirements past December 31, 2016. We feel the USCG should fully implement the requirements of the STCW and that all existing mariners should be required to complete all gap closing requirements by December 31, 2016.

The Coast Guard is encouraging mariners to meet the transitional requirements prior to January 1, 2017. A credential issued to a mariner is valid on its face for the endorsements thereon until expiration of that credential.

STCW Frequently Asked Questions: Medical Certificates

1. How does a mariner with an STCW endorsement get a medical certificate in the event that he or she is not issued one by March 24, 2014?

The Coast Guard will proactively issue medical certificates to all mariners currently holding valid STCW endorsements without further application. The NMC will mail a medical certificate to each mariner holding a current STCW endorsement at the mailing address the Coast Guard has on record for the mariner. Contact the NMC at IASKNMC@ucg.mil, or by phone at 1-888-IASKNMC if you have not received your medical certificate by March 24, 2014.

2. What form does a mariner have to submit when applying for a medical certificate?

46 CFR 10.302(a) requires that in order to obtain a medical certificate, a mariner must provide evidence of meeting the medical and physical standards on a CG-719K or CG-719K/E, as appropriate. A CG-719B form is not required when applying for a medical certificate only.

3. How does a mariner apply for a medical certificate?

Applicants for an original medical certificate must comply with 46 CFR 10.302. Further guidance is provided in NVIC (01-14).

4. In regards to the medical certificates that will be issued to current STCW certificate holders beginning January 2, 2014, how will the expiration date of the medical certificate be determined?

Because the Coast Guard expects to issue a large number of medical certificates in the first year after publication of the regulations, the expiration dates on these medical certificates will vary depending upon when your MMC expires. The examination date and the expiration date of the medical certificate may be adjusted so that the month and date of expiration will be the same as the expiration date of your current credential. The year of expiration will be adjusted to the maximum allowable for that purpose (STCW/FCP/national endorsement).

- 5. I have been sailing on international voyages for years under the MLC requirement for a medical certificate. As such, I renew my ENG-1 every 2 years in addition to the required USCG 5-year certificate. I receive each from the same physician although I also have to pay separately for the certificate. Will the USCG begin to accept the MLC ENG-1 certificates with the new changes?**

No. 46 CFR 10.302(a) requires that in order to obtain a medical certificate, a mariner must provide evidence of meeting the medical and physical standards on a CG-719K or CG-719K/E form, as appropriate.

- 6. I have a question concerning members of the steward's department and entry-level mariners who do not have a VI-1 or Basic Safety endorsement on their MMC because they haven't renewed yet but sail on vessels subject to STCW. Entry-level mariners receive a 5-year national medical certificate only. Is this certificate valid for a mariner to sail on vessels subject to STCW and, if not, which USCG physical form does a mariner need to have completed in order to obtain the proper medical certificate? As of this date, all entry-level mariners, even if they have VI-1 on their MMCs, are only required to submit the CG-719K/E.**

No, the 5-year only medical certificate is not valid for a mariner to sail on vessels subject to STCW. These mariners should obtain an STCW compliant medical certificate valid for 2 years. Such a certificate can be obtained by completing a CG-719K/E for entry level personnel as described in 46 CFR 10.215 and Part 10 Subpart C.

- 7. If a mariner has an entry-level endorsement and he or she sails on vessels subject to STCW, will he or she get a medical certificate issued and for how long? Won't entry-level mariners on vessels subject to STCW need a 2-year medical certificate?**

Entry-level mariners usually get 5-year medical certificate. In the event that a mariner wants to sail on a vessel subject to STCW, he or she must obtain a physical examination on a CG-719K/E form, at which time he or she will receive a medical certificate with the different expiration dates entered, depending on the vessel's service.

8. Can a mariner provide a copy of a medical certificate to port state control officials if they lose their original? How does a mariner obtain a duplicate medical certificate?

A mariner can provide a photocopy of a medical certificate to port state control officials if they lose their certificate. However, there is no guarantee that port state control officials will accept it. 46 CFR 10.229 states that, upon request, a mariner may be issued a duplicate medical certificate after submitting an application with an affidavit describing the circumstances of the loss. The Coast Guard will only issue the duplicate medical certificate after confirming the validity of the mariner's credentials and the validity of the mariner's TWIC.

9. (ADDED 02/14/14**) Will the medical certificate be issued electronically as a PDF document, as well as a paper certificate that the mariner puts in their MMC booklet?**

No, the medical certificate will only be issued by the Coast Guard, and will not be issued electronically.

10. (ADDED 02/14/14**) Can companies obtain medical certificates for mariners in their employ?**

Yes, if the company is identified as the third-party representative by the mariner.

11. (ADDED 02/14/14**) Where will medical certificates be sent?**

The Coast Guard will mail medical certificates to all mariners who hold a valid STCW endorsement as of 17 January 2014, without further application. The medical certificate will be mailed to the address that the mariner used in his or her last credentialing transaction with the Coast Guard. To change your contact information, you may fill out the "Mariner Personal Contact Information Validation Form" available on the National Maritime Center's (NMC) website, or you may call the NMC's customer service center at 1-888-427-5662.

12. (ADDED 02/14/14**) How does a mariner obtain a new medical certificate when the transaction is not part of an MMC renewal, raise of grade or a new endorsement? For example, the medical certificate expires in year 2 of the 5-year period of validity of the MMC.**

The mariner must submit a CG-719K or CG-719K/E in a timely manner. See NVIC 01-14.

13. (ADDED 02/14/14**) What is the period of medical cert validity? 2 years?**

Medical certificates will have 3 expiration dates as stated in 46 CFR 10.301.

14. (ADDED 02/14/14**) If a mariner is sailing only on his or her national endorsement, what is the period of validity of his or her medical certificate?**

The medical certificate would be valid for a maximum period of 5 years.

15. (ADDED 02/14/14**) Will the Coast Guard accept a medical certificate issued by Liberia in accordance with STCW as part of an MMC renewal application?**

No. 46 CFR 10.302(a) requires that in order to obtain a medical certificate, a mariner must provide evidence of meeting the medical and physical standards on a CG-719K or CG-719K/E form, as appropriate.

16. (ADDED 03/24/14**) Do all mariners with STCW endorsements have to have a current medical certificate now or by 1 January 2017? Many mariners are being issued certificates that are either expired or will expire soon. Do these mariners need to do anything now or will they be legal as long as they have a current medical certificate by 1 January 2017?**

Mariners holding STCW endorsements will be issued a medical certificate by 24 March 2014. Once a medical certificate is issued, mariners must keep the medical certificate with their merchant mariner credential (MMC). If an STCW endorsement holder does not receive a medical certificate by 1 April 2014, he or she should contact the National Maritime Center (NMC).

The NMC has recently discovered that some mariners have been issued medical certificates which will expire between January and September 2014. To resolve this issue, the NMC is taking the following actions:

- A new medical certificate will be issued with an STCW expiration date in 2015. This only applies to mariners whose MMC containing STCW endorsements was originally issued during the period of January to September 2012, and
- Mariners who have medical waivers with an annual submission requirement will still receive a time-limited medical certificate that corresponds to the appropriate required submission dates.

17. (ADDED 03/24/14**) Which medical certificate application is referenced in 46 CFR 10.227(d)(6)? Does a mariner have to send a CG-719B along with their CG-719K in order to renew a medical certificate?**

The application for a medical certificate is either a CG-719K or CG-719K/E, as appropriate. This application should be submitted to your local regional examination center (REC) in a timely manner. No, a CG-719B is not required when applying for a medical certificate. See NVIC 01-14.

18. (ADDED 03/24/14**) Does a mariner need a new medical certificate if he or she is not actively sailing?**

No, mariners do not need to obtain a new medical certificate unless they are actively sailing. However, they will be required to obtain one at their next credentialing transaction which requires a medical evaluation.

19. (ADDED 03/24/14**) Some mariners are sailing on vessels subject to STCW and may be calling upon a country signatory to the Maritime Labour Convention. Some of these mariners signed on before the STCW final rule was published, are expected to be on board for a lengthy assignment, and may not be able to verify if they have received their new medical certificate until they get off the ship. Will these mariners be in violation of the final rule if they do not have their new medical certificate in their possession?**

No, these mariners will not be in violation of the final rule. A merchant mariner credential meets the requirements of the medical certificate until an actual medical certificate is issued. The Coast Guard recognizes that there may be significant delays between Coast Guard issuance and receipt by the mariner.

A mariner can confirm issuance of a medical certificate by contacting the National Maritime Center (NMC). In the event that port state control officials need to verify if a mariner has a valid medical certificate, they may contact the NMC for confirmation.

20. (AMENDED 05/27/15**) Will MMCs be issued if no medical certificate has been provided?**

Original MMCs will not be issued without approval for a medical certificate. Renewal of MMCs or application for a new endorsement require application for a medical certificate or an unexpired, medical certificate issued by the Coast Guard. Applicants for a raise of grade must meet the requirements for medical certification for the endorsement sought (see 46 CFR 10.231(c)(8)) A mariner seeking a document of continuity need not present an application for a medical certificate.

21. (ADDED 07/07/14**) First class pilot: How recent does the CG-719K physical exam form need to be in order to use it for renewal of a first class pilot's medical certificate?**

Thirty calendar days from the date the physical examination was performed, for first class pilots. 46 CFR 11.709(b) specifically states that the results of the physical examination must be recorded on a CG-719K form and submitted to the Coast Guard no later than 30 calendar days after completion of the physical examination.

22. (ADDED 07/07/14**) Does the Mariner sailing on vessels subject to STCW have to get a new physical at the two year mark?**

Mariners with STCW endorsements have received medical certificates and must obtain a new physical when seeking to renew that expiring medical certificate.

23. (ADDED 07/07/14**) I recently submitted my application for renewal of my license well in advance of its expiration date. I have already received my medical certificate based on the expiration date of my present license which expires on 9 November 2014. Will my newly issued license also have a medical certificate with it or do I need to file another application to get a new medical certificate?**

You received your current medical certificate as part of the Coast Guard medical certificate surge operation to aid U.S. vessels in rapid compliance with Maritime Labour Convention requirements for medical certification. You will receive a new medical certificate after evaluation of the recently submitted CG-719K. You should receive it, or a letter requesting additional medical information, around the same time you receive your new Merchant Mariner Credential (MMC). If you don't, you may contact the National Maritime Center (NMC) at 1-888-IASKNMC (427-5662) to determine the status of your medical evaluation.

24. (ADDED 07/07/14**) As an employer, am I required to keep the current CG-719K on file or is the certificate good enough?**

No, the mariner must maintain the current medical certificate with his or her MMC and a mariner may not be employed or engaged without a valid medical certificate per 46 CFR 15.401.

25. (ADDED 07/07/14**) Does the mariner need to attach a statement requesting a 2 yr medical certificate or how will the NMC know which certificate they are trying to obtain?**

The completed CG-719K or 719K/E is sufficient to apply for a medical certificate without an additional statement. Medical certificates are issued with specific expiration dates for service under STCW, national, or pilot endorsements. However mariners may receive a time limited certificate based on medical condition.

26. (ADDED 07/07/14**) Should we wait until the new physicals come out specifically for the medical certificates in order to apply for them?**

Mariners can use the current forms available on the NMC's website when applying for a medical certificate.

27. (ADDED 07/07/14**) If a mariner has no medical waiver, will the medical certificate expiration date coincide with the mariner's MMC expiration date?**

For mariners holding STCW endorsements, the Coast Guard surged issuance of the medical certificates and those dates coincided with the issuance of the MMC. In the future, as the Coast Guard issues medical certificates based upon receipt of a CG-719K or 719 K/E, the expiration date will be based upon the completion of the Coast Guard's medical evaluation.

28. (ADDED 07/07/14**) When is the actual date that merchant mariners without STCW endorsements have to have a medical certificate?**

For mariners holding only a national endorsement issued before 24 January 2014, their MMC serves to document their medical certification and a separate medical certificate will not be issued until the first credential transaction after 24 January 2014.

29. (ADDED 07/07/14**) Should we indicate on all applications being sent to the Regional Exam Center (REC) that medical certificates are requested?**

No, it is not necessary to indicate on the CG-719 K or 719 K/E that a medical certificate is being requested.

30. (ADDED 07/07/14**) For raise of grade applications, will up to 3-year-old physicals still suffice or will they require new physicals in order to get the medical certificate?**

For raise of grade applications, a mariner will be required to either hold a valid medical certificate or apply for one. However, during the transition period, mariner's holding only a national endorsement need not submit the CG-719K or 719 KE if it's been less than 3 years since their last physical.

31. (ADDED 07/07/14**) If a mariner's medical certificate will expire during a foreign voyage, may they continue to serve on the vessel until the conclusion of the voyage?**

If the period of validity of a medical certificate expires in the course of the voyage, then the medical certificate will continue in force until the next port of call where a licensed medical practitioner recognized by the U.S. is available, provided that the period does not exceed 90 days.

32. (ADDED 07/07/14**) Pilots: Is the Coast Guard issuing medical certificates to pilots when they submit their annual physical or are they waiting until the pilots renew?**

In accordance with NVIC 01-14, The Coast Guard will issue a medical certificate to each qualified mariner when processing an application that requires a medical evaluation such as issuing an original, raise-in-grade or renewal MMC. The NMC has established a process to issue medical certificates to pilots when they submit their annual physical after 23 January 2014.

33. (ADDED 07/07/14**) Pilots: What will trigger the issuance of a medical certificate to a pilot (i.e., the submission of a 719B or a 719K)?**

The triggering event for the issuance of a medical certificate to a pilot who only holds a national endorsement will be the first to occur of either: 1) submission of a CG-719B seeking renewal or other transaction requiring a medical evaluation; or 2) submission of a CG-719K documenting the results of an annual pilot physical under 46 CFR 11.709. Pilots who also hold an STCW endorsement should already have received a medical certificate.

34. (ADDED 07/07/14**) Pilots: Does the Coast Guard consider the “date of examination” on the medical certificate (established by the date the Coast Guard approves the issuance of a medical certificate) to equate to the date of “the individual’s most recently completed Coast Guard-required physical examination” for the purposes of 11.709(b) and (d)?**

Yes. For the purposes of 46 CFR 11.709(b) and (d), the Coast Guards considers the “individual’s most recently completed Coast Guard required physical examination” to be the same as the date of examination on the medical certificate. To reiterate, the Coast Guard considers the date of examination to be the date that the Coast Guard approves the issuance of a medical certificate. It will not coincide with the date the medical practitioner signed the form CG-719K or CG-719K/E. (See NVIC 01-14.)

35. (ADDED 07/07/14**) Pilots: If medical certificates are issued to first class pilots on two year cycles, and submission of the most recent CG-719K is due bi-annually 30 days after that physical is completed, how will medical certificates be renewed so that there is no gap affecting the validity of the endorsement?**

Mariners are responsible for holding a valid medical certificate. In accordance with 46 CFR 11.709 (b), every other year first-class pilots are required to submit a physical examination on a CG-719K form to the Coast Guard no later than 30 calendar days after completion of that physical examination in order to receive a medical certificate. Mariners must be cognizant of the expiration dates on their medical certificates and the applicability of the dates to their current employment. Renewals should be submitted in sufficient time so that the medical certificate does not lapse. Mariners should monitor the NMC website for information on processing time. Additionally, mariners with medical conditions should submit their applications early to allow adequate processing time.

36. (ADDED 07/07/14**) Pilots: If the regulations now require a physical exam every 2 years, will ship pilots still have to submit an annual CG-719K to the Coast Guard, or will they also go to every 2 years?**

Annual physicals are still required. However, every other year, in accordance with the medical certificate requirements found in 46 CFR 11.709(b) the results of the physical examination must be recorded on a CG-719K form and submitted to the Coast Guard no later than 30 calendar days after completion of the physical examination.

37. (ADDED 07/07/14**) U.S. mariners working on foreign-flagged vessels:**

- 1. Does a U.S. mariner with a national OIM endorsement, but no STCW endorsement, working on a foreign-flagged jack-up rig off the west coast of Africa, need a medical certificate?**
- 2. If so, how long will it be valid for?**
- 3. Does the answer change if the mariner also has an OIM endorsement issued by another country?**

1 and 2: A U.S. mariner working on a foreign-flagged vessel must comply with the requirements of that flag-state Administration.

3: No. The mariner would still have to comply with the requirements of the flag state Administration as well as meeting the new medical certificate requirements for the national endorsement at the next credential activity requiring a medical and physical evaluation.

38. (ADDED 07/07/14**) Which medical certificate will a mariner with basic training and entry-level endorsements receive?**

Entry-level mariners who submit a CG-719K/E will receive a medical certificate which will indicate that he or she is not fit for look-out duties, as well as being marked “no” for any exam requirements not covered by the CG-719K/E. The medical certificate will have the same three expiration dates as any other medical certificate.

39. (ADDED 07/07/14**) Basic training is an STCW endorsement, so shouldn't the mariner receive the full medical certificate?**

Yes and no. An entry-level mariner serving on vessels to which STCW applies will receive a medical certificate that provides all three expiration dates. If the mariner submitted a CG 719 K/E, his or her medical certificate would only document the medical qualifications documented on the CG 719 K/E. Mariners who submit a CG-719K/E will receive a medical certificate which will indicate that he or she is not being fit for look-out duties, as well as being marked "no" for any exam requirements not covered by the CG-719K/E. The medical certificate will have the same three expiration dates as any other medical certificate.

40. (ADDED 07/07/14**) If a mariner has completed basic training and holds an entry-level endorsement (OS, WI, SD (FH)) and is issued an entry-level medical certificate valid for two years, does it meet all requirements under the MLC and STCW final rule to sail on international (STCW) voyages?**

Yes; however, the entry-level credential will not be endorsed for lookout duties unless the mariner completes and submits a CG-719K.

41. (ADDED 07/07/14**) How does a chief cook or steward acquire a medical certificate if he or she does not hold an STCW endorsement, but has basic training and sails on a vessel to which STCW applies during the transition period?**

Mariners currently holding valid entry-level endorsements who are sailing on vessels to which STCW applies must hold a basic training certificate. To apply for a medical certificate, these mariners should submit the following to a regional examination center (REC): a statement indicating they serve on vessels to which STCW or MLC applies (include full name, mariner reference number, and current address); and a copy of a valid basic safety training or basic training certificate. No physical examination or fees are required. If these mariners also wish to have the basic training endorsement issued, they should submit form CG-719B to an REC with Section I - Personal Data completed and ensure their address is current. In Section II- Type of Transaction, they should indicate that they are requesting a medical certificate and issuance of a basic training endorsement. They must also submit the statement and certificates described in the paragraph above. No physical examination or fees are required. If they are in the process or preparing to renew their MMC, mariners should also clearly identify that they will require that their medical certificate be issued.

42. (ADDED 05/27/15**) If my STCW medical certificate expires, does that make my STCW endorsements invalid on an otherwise valid MMC until I receive a new STCW medical certificate?**

No. The expiration of your medical certificate does not affect the validity of your MMC endorsements. However, as stated in 46 CFR 15.401(c)(1), a mariner may not serve under the authority of their MMC endorsement unless they maintain a current medical certificate. Furthermore, if the medical certificate expires in the course of a voyage, then it will continue in force until the next port of call where a licensed medical practitioner recognized by the U.S. is available, provided that the period does not exceed 90 days. A mariner needs to maintain their medical certificate after it is issued, in some cases for those mariners who hold only a national endorsement, the medical certificate may not be issued until 2019.

43. (ADDED 05/27/15**) If I have a valid medical certificate and I'm renewing or applying for a raise of grade or endorsement, can I use my medical certificate in lieu of a USCG physical?**

Yes. For renewals, see 46 CFR 10.227(d)(6). For raise of grade requirements, refer to 46 CFR 10.231(c)(8) there are some transactions where the requirement for the new endorsement may require a different medical evaluation.

44. (ADDED 05/27/15**) Do applicants for an endorsement as operator of uninspected passenger vessels or master 100 GRT need a valid medical certificate?**

An applicant for an MMC endorsement must either hold a valid medical certificate or have submitted an application for an appropriate medical certificate. See 46 CFR 10.225(b)(7) and 10.227(d)(6) or 10.231(c)(8).

45. (ADDED 05/27/15**) I am requesting that the Coast Guard consider allowing mariners to return to work while waiting for their medical certificate renewal. I would like to recommend that the Coast Guard allow a mariner to continue to work onboard U.S. flag vessels on domestic routes only and not have to comply with the STCW requirements to obtain a valid Medical Certificate until January 2017. However, each mariner must satisfactorily complete an annual physical examination that meets the same physical standards for a USCG credential renewal process to serve in the capacity the mariner is being assigned onboard.**

46 CFR 15.401(c) states that a person may not employ or engage an individual in a position required to hold an MMC unless that individual maintains a current medical certificate. Once a mariner has been issued a medical certificate, he or she must maintain an unexpired medical certificate in order to comply with the manning provision of 46 CFR 15.401. See [NVIC 1-14](#), paragraph 5.

46. (ADDED 05/27/15**) When a mariner's medical certificate is restricted such that he or she is not able to serve under the authority of a specific endorsement, shouldn't the endorsement be removed from his or her MMC?**

No. Under the current regulations a mariner's professional qualifications will not be removed when he/she isn't medically qualified. Now that the mariner is required to hold both the MMC and the medical certificate, the vessel operator must ascertain that the individual holds the appropriate medical certificate for the position in which they are employed. See 46 CFR 15.401.

47. (ADDED 05/27/15**) Are mariners required to renew their STCW endorsement when they renew their medical certificate?**

The renewal requirements for endorsements to the MMC and for the medical certificate are separate. A mariner may maintain their STCW endorsements by renewing them every 5 years. However, in order to sail where STCW is required, the mariner must hold a valid and current medical certificate, and for STCW, that medical certificate is valid for 2 years. A mariner who is continuously working under STCW endorsements will need to renew the medical certificate every 2 years, but a mariner who holds STCW endorsements but does not use them would not be required to renew their medical certificate every 2 years.

48. (ADDED 07/22/15**) Medical Certificates for Pilots: I am writing concerning NVIC No. 01-14 as it applies to the requirement of physical examinations for First Class pilots. I received a medical certificate after submission of my CG-719K physical last year. I received my physical on Jan 20th, 2014, and according to 46 CFR 11.709(b) it is valid until the last day of the month in which I received the physical, or in my case Jan 31, 2015. The problem is the Medical Certificate I received has an expiration date of Feb. 7th, 2016. Now I understand that I still need to have a yearly physical exam, but how do I calculate the date it is required by?**

NVIC 01-14 says that my certificate expires on the date indicated on my medical certificate Feb.7th, 2016. Does this mean that I have to complete my 2015 physical by Feb. 7th, 2015, one year prior to the expiration date?

NVIC 01-14 also says I need to comply with 46 CFR 11.709(b) that says my physical expires one year after my last physical at the end of the month in which I had my physical. That would be January 31st. Using these standards I can never reach the expiration date shown on my Medical Certificate for First Class Pilot without being out of compliance. My thinking is that the Medical Certificate should trump the requirements of 46 CFR 11.709(b) as it allows the expiration dates to be synchronized with other mariner documents. If so, it would reason that a modification of language is needed for 46 CFR 11.709(b).

Pilots must comply with two distinct medical requirements.

The first requirement is to hold a valid medical certificate which for pilots is a two year validity period. Each time a medical certificate is issued, the date of the examination on the medical certificate becomes the new date of the “individual’s most recently completed Coast Guard required physical examination” for the purposes of meeting the annual physical requirements of 46 CFR 11.709. In your case, that date is February 7, 2014, the date your physical was approved by the Coast Guard.

The second is to complete an annual examination recorded on a CG-719K. This requirement already existed before the STCW Final Rule. In accordance with 46 CFR 11.709 (b), every other year the physical examination must be submitted to the Coast Guard.

The year following submission of the CG-719K to the Coast Guard, the new annual physical, which does not have to be submitted to the Coast Guard, must be completed by the first day of the month following the anniversary date of the date of examination on the medical certificate. So in your situation, your annual physical examination must be completed by the March 1, 2015.

The next year, which is also the year the medical certificate must be renewed, the physical examination must be completed before the first day of the month following the date of the last physical examination. By regulation, this physical exam must be submitted to the Coast Guard within 30 days of the date the physical examination was completed, but should be submitted earlier to ensure the medical certificate does not expire. Your CG-719K must be submitted not later than March 1, 2016, to have been within 30 days of the date of your physical examination. You may not serve as a pilot while your medical certificate is expired.

STCW Frequently Asked Questions: Safety and Security Evaluations

- 1. NDR convictions on applications. Do mariners have to reveal NDR-listed civil convictions older than 3 years if their MMCs are not currently suspended or revoked?**

At the time of application, each applicant must provide written disclosure of all prior convictions (excluding minor traffic offenses) not previously disclosed to the Coast Guard on an application (46 CFR 10.211). Applicants must also provide authorization for the Coast Guard to search the National Driver Register (46 CFR 10.213). When the Coast Guard receives information regarding NDR-related convictions, it will not normally consider NDR-listed civil convictions that are more than three years old from the date of request unless that information relates to a current suspension or revocation of the applicant's license to operate a motor vehicle.

STCW Frequently Asked Questions: Medical Evaluations

Pending.

STCW Frequently Asked Questions: General Sea Service

- 1. 46 CFR 11.401 (e)(3) reads, “Service on vessels to which STCW applies, whether inland or coastwise, will be credited on a day-for-day basis.” Some people might interpret the phrase “day for day” as meaning a person will be credited with only one day of service for each day served, but the definition of a day in 46 CFR 10.107 allows for 1½ days of credit for 12-hour days when the vessel is authorized to work that schedule. Would you please confirm that the provision in 11.401 (e)(3) does not override the definition in 10.107?**

The provisions in 46 CFR 11.403(e)(3) do not override the definition of “day” in 46 CFR 10.107. On vessels authorized by 46 U.S.C. 8104 and 46 CFR 15.705, to operate a two-watch system, a 12-hour working day may be creditable as 1½ days of service. This is also discussed in 46 CFR 10.232(h)(2).

- 2. Liftboat sea time. Can you provide information on where the USCG is with regard to the National Offshore Safety Advisory Committee’s (NOSAC)/Industries’ claims of unfair treatment of U.S. mariners under Policy Letter 09-01? NOSAC and the industry came together and produced information given to the Coast Guard concerning this issue, and after a couple of months, there has been no response from the Coast Guard.**

We have generally incorporated Policy Letter 09-01 into the requirements found in 46 CFR 10.232(e). The Coast Guard received input from NOSAC in November 2013 concerning NMC Policy Letter 09-01, regarding liftboat sea service credit calculations. In consideration of the input from NOSAC, the Coast Guard will conduct an evaluation of vessel operations and determine whether additional sea service credit should be granted to mariners serving on liftboats.

- 3. (**ADDED 02/14/14**) With regard to sea service letters required by 46 CFR 10.232(a), what evidence will the Coast Guard accept to document sea service? Who must sign these letters?**

Sea service letters or other official documents from marine companies may be signed by the owner, operator, master, chief engineer of the vessel or other senior company official defined in 46 CFR 10.107. The Coast Guard must be satisfied as to the authenticity and acceptability of all evidence of experience or training presented.

4. **(**ADDED 02/14/14**)** If a mariner holds an MMC and is assigned to a non-marine position on a vessel that is not required to be filled by a credentialed mariner, can that employee accrue sea service while in this non-marine position?

Generally speaking, no. The various endorsements require a specified period of sea service in the deck (or engine) department of a vessel. Sea service is defined in 46 CFR 10.107 as “Service onboard a ship/vessel relevant to the issue of a credential or other qualification.” However if the service meets the specific requirements for the endorsement sought, it could be considered “closely related service” under 10.232(g). The Coast Guard will also continue to accept some military service as specified in 10.232(d).

5. **(**ADDED 02/14/14**)** Tonnage requirements. What is the final rule referring to when it says “Examples include the lowering of the minimum tonnage and expanding the acceptance of towing service towards unlimited deck endorsements?” Will this lower the tonnage requirement for advancing my 3rd mate unlimited endorsement? I currently work on a 2,998 GT (ITC) offshore supply vessel and I’m seeking a 2nd mate unlimited endorsement. Currently the ITC requirement for unlimited seetime is 3,000 GT (ITC). Will this change?

46 CFR 10.232(i) states that, for Parts 10, 11, and 12, 1,600 GRT will be considered equivalent to 3,000 GT (ITC). Because the vessel the mariner served on is less than 3,000 GT (ITC), service earned cannot be used to meet the requirement for service on vessels over 1,600 GRT. This mariner would be eligible for 3rd mate with a tonnage limit calculated using 46 CFR 11.402.

6. **(**ADDED 02/14/14**)** Tonnage restrictions. Enclosure (1) to NVIC 02-14, states that “Under 46 CFR 11.402(a)(1), beginning 24 March 2014, applicants for master or mate of unlimited tonnage may obtain service on vessels of 100 GRT or more instead of 200 GRT as required in the rules in effect prior to 24 March 2014. Service earned prior to 24 March 2014, will be credited if it was on vessels over 100 GRT”. Will I be able to remove the tonnage restriction from my 2nd mate (limited tonnage) because of my previous experience (all previous experience is over 100 GRT domestic)? I believe the previous rule was that I had to have 6 months of experience over 1,600 GRT to get my tonnage restriction removed.

No, 11.402(c), which discusses how a mariner may have a tonnage restriction raised or removed, requires 6 months of service on vessels of 1,600 GRT or more in the highest grade endorsed in order to have all tonnage limitations removed.

7. **(**ADDED 03/24/14**) Is service on a vessel operating on the Inside Passage between Puget Sound and Cape Spencer, Alaska creditable towards the able seamen-unlimited rating?**

Yes. Although 46 CFR 10.107 explicitly excludes the waters of the Inside Passage between Puget Sound and Cape Spencer from the definition of “oceans”, 46 CFR 10.232(b)(3) provides specific service credit toward a near coastal or STCW endorsement.

8. **(**ADDED 03/24/14**) Is service aboard all vessels operating between Puget Sound and Cape Spencer, Alaska, credited towards near-coastal and STCW endorsements?**

Yes. 46 CFR 10.232(b)(3) states, for establishing credit for sea service, the waters of the Inside Passage between Puget Sound and Cape Spencer, Alaska, will be credited for near-coastal and STCW endorsements.

9. **(**ADDED 03/24/14**) Is a vessel that operates exclusively on the Inside Passage between Puget Sound and Cape Spencer, considered a “seagoing vessel” if it crosses the boundary line between the U.S. and Canada?**

Yes. 46 CFR 10.107 defines “seagoing vessel” as a ship that operates beyond the boundary line specified in 46 CFR Part 7. The boundary line for this question would be found in 46 CFR 7.150.

10. (ADDED 07/07/14**) 46 CFR 11.301(g)(3) says that “candidates who apply for a credential based on ... approved seagoing service that was completed before 24 March 2014, may qualify under the requirements of this part existing before that date.” Would this paragraph preclude the mariner from applying under the newer regulations, regulations that appear to regard the “inside passage” as near coastal? What if I already have an application that was evaluated before 24 March 2014?**

Considering that the new provisions in 46 CFR 10.232(b)(3) for inside passage service will benefit all mariners, we will immediately apply them to all mariners without regard to whether they are being evaluated under the new rule, or under grandfathering provisions allowing mariners to qualify under the old rules. Accordingly, service on the inside passage may be used to qualify for a near coastal endorsement even if the mariner is eligible for “grandfathering” and is evaluated under the rules in place before 24 March 2014. Mariners with current open applications at the NMC with information pending (letter has been sent to the mariner prior to 24 March 2014 may contact the NMC and request to be evaluated again under these new regulations. The NMC will pull the application and re-evaluate it. If the application has been closed, either timed out or a credential issued, a new complete application must be submitted. The NMC will not re-open those files.

11. (ADDED 05/27/15**) In the Rating Forming Part of the Navigational Watch (RFPNW) NVIC, Enclosure 1 paragraph 2.c., it says: “For qualification as an RFPNW, a day of approved seagoing service is eight hours associated with navigational watchkeeping functions that involve the performance of duties carried out under the direct supervision of a qualified deck officer or a qualified rating (STCW Regulation II/4). As an alternative to eight hours in one day, two periods from two different calendar days, each not less than four hours, will be credited as one day of sea service. When two such periods are combined as a single day of sea service, no additional credit is given for periods served over eight hours total (46 CFR 10.107).” This seems to conflict with the definition of “day” in 46 CFR 10.107, which says, in part, “On vessels authorized by 46 U.S.C. 8104 and 46 CFR 15.705, to operate a two-watch system, a 12-hour working day may be creditable as 1 1/2 days of service.” Am I correct in believing that the NVIC text is not trying to contradict 46 CFR 10.107 and that a mariner on an OSV or tug would get 1 1/2 days of sea service credit for working 12 hours in a day on a vessel with a legal two-watch system?**

Yes, you are correct in that the provisions in enclosure (1), paragraph 2.c. of NVIC 06-14 do not override the definition of “day” in 46 CFR 10.107. On vessels authorized by 46 U.S.C. 8104 and 46 CFR 15.705, to operate a two-watch system, a 12-hour working day may be credited as 1 1/2 days of service. This is also discussed in 46 CFR 10.232(h)(2), where it says, “On vessels authorized by 46 U.S.C. 8104 and 46 CFR 15.705, to operate a two-watch system, a 12-hour working day may be creditable as 1 1/2 days of service.”

12. (ADDED 05/27/15**) Unlimited tonnage endorsements: If a vessel is admeasured under ITC tonnage only and it exceeds 1600 GT (ITC), will this tonnage qualify the mariner for an unlimited tonnage endorsement?**

Yes. Service on a vessel of 1600 GT (ITC) or more solely admeasured under the international tonnage scheme will be used in 46 CFR Parts 11 and 12 with no conversion.

13. (ADDED 05/27/15**) ATB/ITB Service Credit: I have ~3 years sea time on Crowley's ocean going ATB's. The tug is 963 ITC and the barge is 11,457 (265 / 9,810 GRT). I was able to upgrade from my 3rd mate unlimited oceans two years ago to a 1,600 ton master oceans, but I had to re-test. Now I'm wondering what my outlook is to improve my current officer endorsement.**

The regulations published on December 24, 2013, grants credit for service on towing vessels using the aggregate tonnage on a two-for-one basis (2 days experience equals 1 day of creditable service) for up to 50 percent of the total service on vessels of 1600 GRT or more. See 46 CFR 11.211(d) and (e).

Service on ATBs does not receive the same service credit as that on ITBs since ATBs are not required to meet the same construction, outfitting, and manning requirements as ITBs. ITBs are required to meet the same standards as conventional vessels of similar tonnage.

14. (ADDED 05/27/15**) Will my military qualifications be accepted to meet the requirements for an STCW endorsement or will I have to complete the required assessments? And who may sign the STCW assessments on my military vessel?**

For military service the Coast Guard will recognize the professional training, if it is approved by the Coast Guard for the endorsement. If the training is not approved, the mariner will need to complete the assessments required for the endorsement. The Coast Guard recognizes that the military services already approve personnel to conduct assessments and will recognize those individuals as assessors for completion of STCW assessments. Such training can be recognized as being retroactively approved, if the service seeks such recognition for the training.

15. (ADDED 05/27/15**) I am a licensed engineer and I work at sea, as well as dockside, in a full-time position. My interpretation of the phrase "sea service" is that each day I work, at sea or dockside on an operational vessel, using the engineering skills necessary, will be credited as a day of service. Can you please verify that this is the correct interpretation of this phrase?**

"Seagoing service" is defined as "service onboard a ship/vessel relevant to the issue of a credential or other qualification." Usually, this service includes time that the vessel is both in port and underway engaged in its normal operational routine. For detailed explanations and major exceptions see 46 CFR 10.232.

STCW Frequently Asked Questions: Course Approvals, Course Completion Certificates

- 1. Course completion certificates. How long is a USCG approved course certificate issued by a school valid for a mariner to get that endorsement on their MMC? (1 year or 5 years?)**

Course completion certificates are valid for varying amounts of time, depending on the specific course taken.

- 2. (**ADDED 02/14/14**) How long must the new upcoming STCW classes be?**

We recently published NVIC 03-14, entitled "Guidelines for Approval of Training Courses and Programs," that provides recommended length of courses. If a training provider can demonstrate that they can provide the training in a shorter period of time, the Coast Guard will consider that proposed course.

- 3. (**ADDED 07/07/14**) Leadership and teamwork training: Where is the information located in the final rule for the new requirements for leadership and teamwork training? Is there a model course?**

The requirements to complete approved training in leadership and managerial or leadership and teamworking skills may be found for deck officers in the 46 CFR 11.305-11.321 series and for engineer officers in the 11.325-11.333 series. This competence will be provided in the operational level and management level assessment NVICs when they are published.

- 4. (**ADDED 07/07/14**) Can leadership and teamwork courses be delivered online?**

Although not prohibited, it would be difficult to conduct these courses online, since there are practical team exercises in the course.

- 5. (**ADDED 07/07/14**) Leadership and managerial skills training: Is there a model course available for leadership and training?**

Not at present. However, the IMO is currently developing model courses that include Leadership and Teamwork Skills and Leadership and Managerial Skills.

The Coast Guard has published guidance for the development of such courses in NVIC 03-14.

6. **(**ADDED 07/07/14**) Who may conduct the internal audit required in 46 CFR 10.403 (a)(8) and discussed in NVIC 03-14 part 5.j.2?**

An internal audit may be conducted by personnel within the company, but it should be conducted by someone independent of the activity being audited, if possible.

7. **(**ADDED 07/07/14**) If a student is granted 90 days of sea service for successfully completing a fireman/watertender/oiler (FWTO) course, may he or she apply the 90 days toward the 6 month sea service requirement for RFPNW? The training they receive aligns with RFPNW duties.**

No. 46 CFR 10.404 (a) (4) states that the Coast Guard does not credit service granted for training when an applicant applies for an STCW endorsement.

8. **(**ADDED 07/07/14**) A few of my mariners have no sea time. Would our approved course completion certificate issued prior to 24 March 2014 suffice to meet the test prerequisite in lieu of testing at the Coast Guard if it was submitted after 24 March 2014? This pertains to course completion.**

The grandfathering provisions would apply in this situation where the training was begun before 24 March 2014. Mariners who met the grandfathering requirement of beginning service or training before 24 March 2014, may choose to be tested under the previous regulations. Accordingly, a course that was approved to meet the testing under the previous regulations would be acceptable to meet the examination requirement. The course is subject to the same time limitations that applied under the old regulations, it must have been completed within one year prior to the mariner's application for the endorsement.

9. **(**ADDED 07/07/14**) Can we be granted approval to combine BRM & ERM into one course and run engine and deck personnel through the same resource management course? While researching the Knowledge, Understanding, Proficiencies (KUPs), Methods for demonstrating competence & Criteria for evaluating competence for ERM in the STCW Code, we discovered that they are word for word the exact same as for BRM.**

The Coast Guard could accept a course that consolidates BRM and ERM if the submitter adequately addresses the differences associated with deck and engine competence and its criteria for evaluation. This may require the consolidated course to be longer than proposed in guidance associated with each individual course.

10. (ADDED 07/07/14**) Are the leadership and managerial skills and leadership and teamworking skills courses stand-alone courses or part of basic training? If they are stand-alone courses, does the IMO Publication for the course leadership and teamwork cover the course requirements or do I find them somewhere else? Who needs these courses and how long do they need to be. Do the course completion certificates expire?**

The leadership and managerial skills and leadership and teamworking courses may be stand-alone courses and are part of the assessment requirements for operational and management endorsements. They might also be tied to bridge resource management or engine-room resource management courses. However, they would not be part of a basic training course. The requirements to complete approved training in leadership and managerial skills or leadership and teamworking skills may be found for deck officers in 46 CFR sections 11.305-11.321 and for engineer officers in sections 11.325-11.333. These competences are provided in the operational level and management level assessment NVICs. Course completion certificates should be submitted to the NMC within 5 years of the course completion date.

11. (ADDED 07/07/14**) Does completion of an approved leadership and management course satisfy the requirements for an applicant to demonstrate competence in leadership and teamworking skills?**

Yes. Completing a leadership and management course that complies with STCW Code Table A-III/2 would satisfy the requirement to demonstrate competence in leadership and teamworking skills.

12. (ADDED 05/27/15**) I am requesting clarification of 46 CFR 10.410 concerning Quality Standard System (QSS) requirements. Which courses must have a QSS in place? If I have four Coast Guard-approved courses leading to STCW endorsements, am I required to also include approved courses leading to national endorsements in a QSS?**

As stated in 46 CFR 10.410(a), providers of Coast Guard-approved courses, programs, training, and Coast Guard-accepted training creditable towards an STCW endorsement must establish and maintain a QSS, in accordance with Regulation I/8 of the STCW Convention (incorporated by reference, see § 10.103 of this part).

13. (ADDED 05/27/15**) Do schools establish their own qualifications for internal auditing/assessing for QSS?**

The school is responsible for establishing its QSS based on the regulations found in 46 CFR 10.410. This includes information on auditing reviewing and improving the performance of the training management system.

14. (ADDED 05/27/15**) What is the date a school offering Coast Guard-approved courses programs, and training creditable towards an STCW endorsement must have a QSS in place?**

January 1, 2017. See 46 CFR 10.410(f).

15. (ADDED 05/27/15**) Will there be any further guidance published on QSS?**

The Coast Guard has no immediate plans to publish additional guidance concerning QSS.

16. (ADDED 05/27/15**) I am requesting clarification of the phrase “Completion of a course or program”. Course or program completion can be viewed three ways; at the end of the formal instruction; when the course exams are given which is after the course completion; or when the certificate is uploaded to MTAD. This clarification is important as it effects how we keep the required records and for the internal audits per this same NVIC**

A course or program is considered to be completed when all of the requirements for the course, including all lessons, practical exercises, and examinations have been successfully completed. This completion date is also the date that should appear on the course completion certificate.

17. (ADDED 05/27/15**) If someone completes a Coast Guard-approved Leadership and Management level course and uses the course completion certificate to meet the operational level gap closing requirements for “evidence of competence in leadership and team working skills” prior to January 1, 2017, can they use the same course completion certificate to meet the STCW requirements for a Leadership and Management Skills course when/if upgrading to the STCW Management Level after January 1, 2017?**

Yes, provided that the course was completed less than 5 years prior to applying for the upgrade to the management level. (See Sec 5.a.2.iii of NVIC 3-14.)

18. (ADDED 05/27/15**) Approved instructors. Does NVIC 03-14 apply to radar simulator train the trainer requirements?**

The requirement in 46 CFR 10.402(b)(2)(iii)(A) states that instructors in Coast Guard approved courses must have training in effective instruction and assessment. This requirement applies to all approved courses, and to all schools with approved courses. The regulations make no distinctions between courses or whether the school is large or small. As is explained in Enclosure (2) to NVIC 3-14, this requirement does not apply to instructors who were approved before March 24, 2014 who are not seeking approval to teach new courses. It will apply to all other instructors.

Paragraph 1.f of enclosure (2) of NVIC 03-14 states that, in addition to the requirement for experience and training in effective instruction techniques discussed above, if a simulator is used in a course, the instructor should have practical operational experience on the particular type of simulator being used and receive guidance in instructional techniques involving the use of simulators. Such guidance or instruction should include development of and sequencing of simulated scenarios that have specific learning objectives as found in the International Maritime Organization's (IMO) Train the Simulator Trainer and Assessor Model Course (Model Course 6.09a).

19. (ADDED 05/27/15**) Course completion certificates. Must a school provide the mariners reference number, CFR citation and STCW citation information on their course completion certificates like the sample certificate found in NVIC 03-14?**

No. As a minimum, 46 CFR 10.402(b)(8) states that, in the course approval request package, a sample course completion certificate should be included that allows for the following information to be entered:

- (i) Course provider number
- (ii) Course number; and
- (iii) Terms of approval.

20. (ADDED 05/27/15**) Quality standard system (QSS). What is the date by which maritime educators offering STCW courses must have an approved QSS in place?**

Maritime educators offering STCW courses must have an approved QSS in place by January 1, 2017.

STCW Frequently Asked Questions: Examinations

- 1. Chief engineer of steam, motor and/or gas turbine-propelled vessels. We provide training material for the engineer limited (near-coastal) and the chief engineer (limited-oceans). Will the exam subjects for the combined license include electronics?**

Yes, the chief engineer (limited) endorsement requires examination on electronics as listed in Table 2 to 46 CFR 11.950.

- 2. (**ADDED 02/14/14**) Examination Tables in Subpart I. Will the Coast Guard use the new subjects table when they test maritime academy students in the spring of 2014?**

The Coast Guard will not begin using the new examination tables for students in academy programs until 2016.

- 3. (**ADDED 07/07/14**) The final rule states that applicants who take examinations after 24 March 2014 will take the examination as discussed in the final rule. What subjects will applicants be tested on?**

Mariners who began training or service prior to 24 March 2014 will be examined under the old examination unless they request to be examined under the new examination regimen. Any examination will be based upon the knowledge requirements established in the regulations in 46 CFR Subpart I - Subjects of Examinations.

- 4. (**ADDED 07/07/14**) On the NMC website, the deck exams button has a diagram. Although there is an explanation of what is on the deck exam prior to 24 March 2014 there is no detail on what will be on the exam after 24 March 2014. There do not appear to be any different Xs or footnote indicators in the 46 CFR Table 11.910, which implies that the same criteria for the examinations still remain.**

Mariners who began training or service prior to 24 March 2014 will be examined under the old examination unless they request to be examined under the new examination regimen. Any examination will be based upon the knowledge requirements established in the regulations in 46 CFR Subpart I - Subjects of Examinations.

5. **(**ADDED 07/07/14**)** In the NMC deck and engine guide book, the exam codes indicate that the deck exams are combined (third mate/second mate and chief mate/master). For the engineer exams, the exam codes indicate that there are four separate exams with different modules for third assistant, second assistant, first assistant, and chief engineer.

The new deck and engine exam guide has not been published by the Coast Guard. However most, if not all, mariners testing at this time will have had service before 24 March 2014 and are, therefore, eligible to test under the old regulations. Those mariners examined since January 31, 2002 have been given exams that combined third and second assistant engineer and first assistant and chief engineer. This should be resolved in the upcoming revision to the exam guide.

6. **(**ADDED 07/07/14**)** The new regulations, published on 24 December 2013 indicate that officer endorsement exams for engineers will only be given for those seeking a third assistant or first assistant engineer endorsement (mariners will be eligible for second assistant and chief engineer endorsements after providing proof of 360 days of service on their current endorsement). However, in 46 CFR Table 1 to 11.910, it indicates that there are separate examinations for those seeking third mate, second mate, chief mate, and master endorsements.

The codes for 46 CFR Table 1 to 11.910 indicate that column #1 is for those seeking master/chief mate unlimited endorsements, while column #3 is for those seeking second mate/third mate unlimited endorsements. As indicated in 46 CFR 11.903, those seeking master or second mate endorsements are not required to take an exam.

7. **(**ADDED 07/07/14**)** The regulations and the NMC deck and engine guide book contradict each other. Since they are not consistent, many mariners are asking what the requirements are for the deck officer exams based upon the NMC posting. When will clarification be published to help mariners and the industry better understand what the NMC is doing? Is the NMC preparing to release the STCW Manila Amendment questions? Will questions be released for all level of examinations, or only for management level examinations?

The new deck and engine exam guide has not been published by the Coast Guard. Examination questions are updated annually on the NMC website. An update will be released at the same time the new deck and engine exam guide is released.

However most, if not all, mariners testing at this time will have had service before 24 March 2014 and are, therefore, eligible to test under the old regulations.

There are no specific new exam questions resulting from the Manila Amendments. Nor are there any examinations required for STCW endorsements.

8. **(**ADDED 05/27/15**)** It would eliminate a tremendous burden on the mariner if they were allowed to take their credential examination prior to having completed all of the required 360 days of sea service. This doesn't seem to be much of a burden on the NMC since they already allow the Academy students to sit before they complete all of their course work. This is similar, except it is sea service. 46 CFR 11.201 seems to provide that authority to the NMC.

Per 46 CFR 11.201(j)(1)(iii), applicants within an approved program will be approved to sit for an examination up to 6 months prior to completion of the program only if the applicant has provided all sea service and assessments before the examination date. This regulatory cite is applicable to any approved comprehensive program, including maritime academies.

STCW Frequently Asked Questions: Use of Non-U.S. Personnel

- 1. Is it correct to believe a mariner who is a citizen of nation X serving on a U.S.-flag vessel on a near-coastal voyage in the waters of nation X holding near-coastal credentials issued by nation X is permitted to serve on that vessel (subject to 46 CFR 11 Subpart J)?**

Assuming that this individual is from a nation which is on a list of countries of which the U.S. recognizes their STCW certificates, the officer would be permitted to serve on that U.S. vessel. Such an officer would need to obtain a certificate attesting to recognition, in accordance with the requirements found in 46 CFR 11 Subpart J, or may serve for a period not to exceed 3 months while the Coast Guard is processing his or her application for such a certificate.

- 2. What documentation/endorsement, if any, does a mariner who is a citizen of nation Z serving on a U.S.-flag vessel on a near-coastal voyage in the waters of nation X holding near-coastal credentials issued by nation Z need to serve on this vessel? Is it just 46 CFR 11 Subpart J, or something more?**

Assuming that the officer meeting this criteria holds a certificate issued by a country whose certificates the U.S. has determined it will recognize, he or she would need a certificate attesting recognition as required by 46 CFR 15.720(e), and which requirements are found in 46 CFR 11 Subpart J. The officer may serve for a period not to exceed 3 months while the Coast Guard is processing his or her application for such a certificate.

STCW Frequently Asked Questions: Recognition of Foreign Certificates

1. **(**ADDED 07/07/14**)** Does Mexico recognize near-coastal endorsements issued by the U.S. Coast Guard? Some mariners desiring to work in Mexican waters do not have oceans endorsements, but have been told that they will be able to work in Mexico because the Mexican government recognizes our near-coastal endorsements.

The U.S. has received acceptance of our near-coastal endorsements by some foreign Administrations. In those Administrations' near-coastal waters, the U.S. near-coastal endorsements may be used. The responsibility for enforcement of another Administration's near-coastal waters lies within their port state control procedures. We do not have a definitive list of those countries/Administrations that consider the U.S. near-coastal endorsements as being acceptable for service in such foreign coastal jurisdictions. All of the current informal agreements/understandings precede the 2010 STCW Amendments. In the near future, we intend to communicate with relevant Administrations to ascertain the status of such mariners.

2. **(**ADDED 07/07/14**)** U.S. – Canada memorandum of understanding: Can a mariner with an OUPV endorsement undertake a voyage with passengers from the U.S. to Canada on his or her national endorsement, or does he or she need an STCW endorsement?

Yes, you can undertake a voyage to Canada with your national OUPV endorsement. There is no associated STCW endorsement for the OUPV endorsement. Normally, OUPV operators are not allowed to undertake international voyages. However, the Memorandum of Understanding between the U.S. and Canada allows the use of domestic (or national) endorsements in cross-border trade; therefore, mariners with national OUPV endorsements may undertake voyages to Canada within the restrictions associated with their OUPV endorsement.

3. **(**ADDED 09/15/15**)** Which countries certificates of competency are recognized by the U.S.? Are green card holders able to serve as officers on board U.S. flagged vessels? Can you issue officer endorsements to permanent residents of the U.S.? Is there a list maintained by the U.S. of administrations whose certificate of competencies are recognized?

At present, the U.S. has not issued any recognition certificates for other Administration's certificates of competencies. The U.S. Code and federal regulations limit officer endorsements to U.S. citizens only. See 46 United States Code 7102 and 46 CFR 10.221.

STCW Frequently Asked Questions: Security Endorsements

- 1. Does an endorsement as Security Awareness (SA) or Vessel Personnel with Designated Security Duties (VPDSD) require the mariner to at least hold an entry level credential (Ordinary Seaman, Wiper, and/or Food Handler)?**

No, you do not have to hold an entry level credential in order to receive an endorsement as SA or VPDSD. When applying, you will need to submit an application, 719K/E, and evidence that you qualify for SA or VPDSD. You will also need to enroll for a Transportation Worker Identification Credential (TWIC) at the Transportation Security Administration (TSA).

- 2. What are the STCW Security Awareness and Vessel Personnel w/ Designated Security Duties endorsements for?**

All mariners serving on vessels engaged on voyages to which the STCW applies must have training in and an endorsement for Security Awareness. If any of their assigned duties on ship will include security of the vessel, they must also hold the VPDSD endorsement. The STCW regulation VI/6 covers both capacities. Depending on what you qualify for, you will have VPDSD and/or SA listed under the capacity section of your credential.

- 3. I already have Vessel Security Officer (VSO). Do I need to get these endorsements added to my credential?**

If you already hold VSO, you are qualified for VPDSD and SA. On your next credential transaction those endorsements will be added to your credential. If you want, you can submit an application now to have them added. If that is your only transaction on that application, there will be no charge and you will receive a single page endorsement to add to your credential.

- 4. Who needs the new security endorsements, and when do they have to have them?**

The 2010 amendments to the STCW require all mariners serving on a vessel to which the STCW applies to have endorsements for security awareness. All persons assigned specific security duties must have the VPDSD endorsement. The 2010 STCW amendments entered into force on January 1, 2012. While the United States has yet to enact regulations requiring mariners to comply with the 2010 STCW amendments, they are in effect internationally. Difficulties such as vessel detention may be encountered if mariners on foreign voyages to which STCW applies do not have the new endorsements.

5. Do I have to take a course to get one of the new security endorsements?

Not necessarily, for VPDS, mariners could take a course or provide documentation attesting to seagoing service with designated security duties OR performance of security functions equivalent to designated security duties for 6 months in the preceding 3 years. See Coast Guard Policy Letter 12-06 for more details.

6. I recently took a course called “Vessel Personnel with Specific Security Duties.” Can I get the new endorsements because I took this course?

Yes, provided that the course was approved by Det Norske Veritas (DNV) under the voluntary program operated by Maritime Administration (MARAD). The VPSSD course approvals for DNV and MARAD are valid. A mariner will be issued an endorsement for VPDS and SA upon submission of an application and course completion certificate from a course that was approved under the MARAD program.

7. Will there be a fee for security endorsements after March 24, 2014?

Consistent with 46 CFR Table 10.219(a), no fees will be charged for STCW endorsements on existing MMCs, unless the mariner is seeking a renewal or raise in grade of their MMC. In that case, the application will be processed as a renewal under 46 CFR 10.227 or processed as a raise in grade under 46 CFR 10.231, and the appropriate fees will be charged.

8. On the NMC website, there is an STCW FAQ which states that a mariner needs to have a drug test to apply for a security endorsement as VPDS and SA, but in the final rule, 46 CFR 12.625 does not state that. Can you please clarify?

There is no requirement for a chemical test for dangerous drugs for any of the three vessel security endorsements. These individuals will be under the testing regime of 46 CFR Part 16 and generally will hold an endorsement that already requires drug testing. The NMC's STCW FAQ has been amended.

9. Can you please confirm that the deadline for the requirement to obtain the VSPDS endorsement has been extended to March 24, 2014?

Policy Letter 12-06 is still the current guidance on security endorsements until March 24, 2014. International requirements to hold the endorsements by January 1, 2014, are still effective. We intend to provide updated guidance in a NVIC after March 24, 2014.

10. (ADDED 02/14/14**) Is the requirement to hold a security endorsement based on the credential I hold or is it a manning requirement? For example, I serve on a vessel of less than 200 GRT; however, I hold an endorsement for master of not more than 200 GRT.**

As discussed on page 78010 of the preamble to the final rule, regulations VI/5 and VI/6 of the 2010 Amendments apply only to vessels of 500 GT or more. The STCW security requirements only apply to vessels subject to the STCW Convention. The manning requirements for security personnel on U.S. flag vessels only apply to seagoing vessels of 500 GT or more. There is still a security training requirement under the Maritime Transportation Security Act (MTSA), in 46 CFR 104.220.

11. (ADDED 02/14/14**) What specific information needs to be on the letter from my employer attesting to my service in order to obtain an endorsement as vessel personnel with designated security duties?**

46 CFR 12.625(a)(1) states that an applicant for this endorsement must present satisfactory documentary evidence, such as a letter signed by a company official, stating that the applicant meets the requirements in 33 CFR 104.220. Alternatively, the applicant may submit a certificate of completion from a Coast Guard-accepted or Coast Guard-approved course, of meeting the same requirements.

12. (ADDED 02/14/14**) Do vessel security endorsements have to be renewed?**

No, the endorsements do not have to be renewed. However, the medical certificate and MMC do have to be renewed.

13. (ADDED 03/24/14**) How does a mariner obtain a valid STCW endorsement for vessel personnel with designated security duties (VPDSD) or security awareness (SA) after 24 March 2014 without having to complete a Coast Guard-accepted or Coast Guard-approved course?**

The requirements for obtaining an endorsement as VPDSD are located in 46 CFR 12.625. The requirements for obtaining an endorsement as SA are located in 46 CFR 12.627. Mariners need to submit an application that meets the requirements of Parts 10 and 12.

14. (ADDED 03/24/14**) Which U.S. mariners are required to have a security endorsement as vessel personnel with designated security duties (VPDSD)?**

Mariners serving on vessels to which STCW applies, who meet the definition below, must have an endorsement as VPDSD. Those mariners serving on vessels to which STCW does not apply must meet the requirements of 33 CFR 104.220.

46 CFR 10.107 defines vessel personnel with designated security duties as “a person, excluding the designated security officer (e.g., Company Security Officer (CSO), as defined in 33 CFR chapter I, subchapter H, and Vessel Security Officer (VSO)), having specific security duties and responsibilities in accordance with the ship security plan.”

15. (ADDED 07/07/14**) I currently have a Vessel Security Officer (VSO) endorsement on my document. Do I need to submit an application for the new security sticker also?**

If you already have an endorsement as VSO, you do not need any additional endorsements on your MMC. As discussed in section 7.b of enclosure (2) of NVIC 02-14 (Grandfathering and Transitional Provisions for Merchant Mariner Credentials), an MMC with a VSO endorsement will also be endorsed with both the Vessel Personnel Designated with Security Duties (VPDSD) and Security Awareness (SA) endorsements at the next renewal or during the application process for the endorsement.

16. (ADDED 07/07/14**) For those crew members who have undergone security training prior to 24 March 2014 and have the course completion certificate in their file, do they need to submit application for the new security sticker?**

Those crew members who have undergone security training prior to 24 March 2014, and have the course completion certificate in their file, will need to submit an application for the new security endorsements if not already issued.

17. (ADDED 07/07/14**) What must be submitted as “documentary evidence of meeting the requirements” mentioned in 46 CFR 15.1113(c)? My company is a USCG certified VPDS course provider and we give the students the required certificate/documentation to meet this statement. However, how else can a mariner meet the documentation requirement? Can an employing company simply give them a piece of letterhead that says “John Smith meets all the requirements set forth in 33 CFR H 104.225” without physically demonstrating 104.225 (a) - (n), certified by the Company Security Officer (CSO)?**

To qualify for an STCW endorsement as VPDS, a mariner must present satisfactory documentary evidence, such as a certificate or letter signed by a company official.

18. (ADDED 07/07/14**) The IMO site states: “Guidance on training and certification requirements for ship security officers and seafarers with designated security duties has been agreed by IMO, to address practical difficulties seafarers have reportedly experienced in obtaining the necessary security certification under the 2010 Manila amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW) and STCW Code.” The guidance recommends that, until 1 July 2015 relevant training under section 13 (Training, drills and exercises on ship security) of the International Ship and Port Facility Security (ISPS) Code should be accepted as being equivalent to that required under the STCW Convention and Code. How does this impact U.S. mariners/US vessels if at all? Or does the 24 March 2014 date stand?**

The Coast Guard strongly encourages owners and operators of U.S.-flagged vessels subject to STCW to ensure that mariners obtain the STCW security endorsements as soon as possible. See the Coast Guard’s [Marine Safety Information Bulletin 06-14](#).

19. (ADDED 07/07/14**) With the recent publication of MSIB 06-14, regarding Uniform Approach on Treatment of Mariner Security Training Certification; under the 2010 Manila Amendments to the STCW Convention, does this mean that a current mariner could still apply for a VPDS endorsement with a letter stating that they have a minimum of six months of sea service within the previous three years aboard ships that conduct security drills in order to meet the requirements, or would they now have to attend an approved VPDS class?**

MSIB 06-14 discusses the enforcement of security endorsement requirements. Applicants seeking these endorsements after 24 March 2014 must meet the requirements of 46 CFR 12.625.

20. (ADDED 07/07/14**) Is it true that all mariners employed or engaged in any capacity on ships which are required to comply with the ISPS Code must complete approved security awareness (or higher) training and get an endorsement on their MMC by 1 January 2014? Unless their sea service began before 1 January 2012, in which case they could obtain this certification by simply documenting six months of sea service during the preceding three years, as long as it was accomplished by 1 January 2014?**

Yes, all mariners on vessels to which the ISPS Code applies must be in compliance with the training requirements by 33 CFR 104.220 and 104.225. After 24 March 2014 mariners seeking endorsements as VPDS or security awareness must comply with the requirements found in 46 CFR 12.625(a) or 12.627(a), as appropriate.

21. (ADDED 07/07/14**) For towing vessels subject to STCW, embarked on national voyages only and without a security plan, is there a requirement for STCW security training and endorsements?**

Onboard a seagoing vessel (as defined in 46 CFR 10.107) of 500 GT or more to which the International Ship and Port Facility Security (ISPS) Code applies, the requirements for STCW security training and endorsements apply. If your vessel is less than 200 GRT, and is engaged exclusively on domestic near-coastal voyages, then it is not subject to any obligation for the purposes of the STCW Convention.

22. (ADDED 05/27/15**) Security endorsements: The technicians on my vessel are standing security watches at the gangway and, as such, we are requiring them to obtain entry level and VPDS endorsements to meet the regulatory requirements. Please clarify the medical application requirements for these technicians.**

In 46 CFR Table 1 to section 10.302(a), the regulations require only a CG-719K/E for these applicants.

STCW Frequently Asked Questions: Tankerman Endorsements

- 1. Regarding 46 CFR 13.203 (c), has the specific wording of this section changed under the final rule? Changes to this section would have ramifications regarding crossover between DL and LG endorsements as well as obtaining advanced tanker endorsements under STCW.**

No, only minor grammatical changes have been made to this section.

- 2. With regard to STCW endorsements for advanced oil, chemical and LG when already holding an advanced endorsement, there do not appear to be any provisions to reduce the sea time required from 90 days, other than as a supernumerary in a 30-day program. This makes obtaining an STCW tankerman endorsement based on our national tankerman endorsements much more difficult. There should be a provision to obtain STCW advanced endorsements when crossing over with reduced time similar to the provisions in 13.203.**

The provisions in 13.603, 13.605, and 13.607 were included to provide for the issuance of STCW endorsements in accordance with the Convention through compliance with the requirements for national endorsements. In order to be consistent with the STCW Convention, we have not included a crossover provision from one endorsement to another at the advanced level in this final rule. To alleviate this issue, 13.603(d) 13.605(d) and 13.607(d) all include the option of a 30-day onboard program in order to cross over from one endorsement to another. With regard to those mariners who already hold a valid PIC endorsement and who will be issued an STCW advanced level endorsement in accordance with 13.603(e), 13.605(e), or 13.607(e), they can continue to renew the endorsement without any additional sea service in accordance with 13.120 by showing proof of having completed a course appropriate to the endorsement within the preceding 5 years.

- 3. I want to apply for an STCW endorsement for service on tank vessels. How will policy letter 12-07 affect me?**

Mariners who hold an endorsement for Tankerman-PIC (Barge) qualify for an STCW endorsement for tank vessel service. A mariner who holds or qualifies for an endorsement as Tankerman-PIC (Barge) will qualify for an STCW endorsement for advanced tanker operations with a limitation to vessels that are not self-propelled. The wording of the endorsements has also changed. All applications for an STCW tank vessel endorsement will be issued with the new wording.

4. I currently have a domestic tankerman endorsement. Will I automatically receive an STCW tankerman endorsement when I apply?

Yes, applications will automatically be evaluated for STCW tank vessel endorsements. If you have a valid qualification in BST, you will be issued the STCW tank vessel endorsement.

5. (ADDED 02/14/14**) Will there be a NVIC on the tankerman endorsements? If so, will it address how sea service should be documented to address type of cargo carried and how to obtain crossovers for vessels certified to carry chemicals and oil?**

Yes. We intend to publish a Tankerman NVIC.

6. (ADDED 07/07/14**) Is a tankerman-engineer required to prove participation in at least two transfers of liquid cargo in order to maintain their tankerman-engineer endorsement?**

No. 46 CFR 13.120(d) states that in order to renew a tankerman-engineer endorsement, all the mariner needs to do is produce evidence of: (1) at least 90 days of service during the preceding 5 years onboard a tank vessel for which the endorsement is valid, performing duties appropriate to the tankerman endorsement held; or (2) completion of a course approved for this purpose, appropriate for the endorsement to be renewed, within the previous 5 years.

STCW Frequently Asked Questions: QMED Endorsements

1. Will the NMC issue stand-alone pumpman, machinist, electrician, and reefer engineer endorsements until 2017?

For mariners who began service or training before March 24, 2014, the Coast Guard will only issue these stand-alone endorsements until March 23, 2015. After that date, the Coast Guard will no longer issue original individual endorsements for refrigerating engineer, machinist, electrician, or pumpman. However, a mariner who holds any of these endorsements may continue to renew them as long as he or she is qualified.

STCW Frequently Asked Questions: OSV Endorsements

- 1. For Officer endorsements for Offshore Supply Vessels (OSVs). The text of 46 CFR 11.493 master (OSV) says that at least one-half of the required experience must be served as chief mate. The FR defines chief mate as the deck officer next in rank to the master and upon whom the command of the vessel will fall in the event of incapacity of the master. On nearly all OSVs there is no requirement for an officer to hold a national endorsement as chief mate on the Certificate of Inspection due to the two-watch system in effect, yet the person serving as mate meets the definition of chief mate stated above. Yet in multiple locations in the preamble the text says, “Where the mariner holds a management-level credential, and fills the position as mate, and the position meets the definition of chief mate found in 10.107, then that service will be credited as chief mate.” The preamble view would make achievement of master (OSV) not possible by a person holding and serving as mate (OSV). Please confirm that a mate (OSV) serving on a vessel where the only required deck officers are a master and a mate will be given chief mate service credit despite text in the preamble that attempts to override the chief mate definition in the FR text?**

For Officer endorsements for Offshore Supply Vessels (OSVs). “Chief Mate” is defined in 46 CFR 10.107 as “the deck officer next in rank to the master and upon whom the command of the vessel will fall in the event of incapacity of the master.” In the event that a vessel’s Certificate of Inspection does not require that a licensed chief mate be assigned, service credit will be granted to the officer onboard who serves the chief mate’s function. In regard to the STCW endorsement, the mariner must also meet the requirements for master as identified in the regulations (46 CFR 11.305 or 11.311 as applicable).

- 2. I currently hold a Master OSV 6,000 ITC endorsement, have been working under authority of that license as chief mate on an OSV of over 4,000 GT for well over 360 days, and have completed all of the master’s assessments. It appears that, under this final rule, I may be able to test directly for a master unlimited endorsement and bypass the chief mate endorsement. I want to be sure that that is the case so I can make application immediately.**

Yes, you may use documented service as chief mate towards the master unlimited endorsement. You may receive a tonnage limitation based upon the service that you submit. (In this case, the mariner would not receive a limitation since all service is over 3,000 GT.)

3. **Mate (OSV).** The requirements for Master and Chief Mate (OSV) have qualification provisions leading to tonnage limitations set above or below 3,000 GT up to a limit of 10,000 GRT/GT. The requirements in 11.497 for Mate (OSV) have such no provisions for any tonnage limitation. Does this mean that a person endorsed for Mate (OSV) under 11.497 will have a tonnage limitation automatically set at 10,000 GRT/GT?

The requirements for an endorsement as mate (OSV) may be found in 46 CFR 11.497. Mariners found qualified for this endorsement will be issued a mate (OSV) endorsement with no tonnage limitations and, comparable to OICNW, will authorize service on vessels of 500 GT or more.

4. **(**ADDED 02/14/14**) Liftboat endorsements.** Can the Coast Guard create a liftboat-only endorsement allowing the same or closely related sea service requirements for equivalent licensing?

Creation of liftboat endorsements was not included in this rulemaking. We will forward this e-mail to the appropriate Coast Guard office for consideration.

5. **(**ADDED 02/14/14**) Offshore supply vessels (OSVs).** How does a mariner who holds an officer endorsement as master or chief mate that allows them to work on an OSV up to 6,000 GT (ITC) get a master or chief mate endorsement for service on OSV's up to 10,000 GT (ITC), as we now have OSV's coming in over 7,000 GT (ITC)?

As masters and chief mates of offshore supply vessels gain experience on vessels of higher tonnage, they may request that the Coast Guard increase the tonnage on their endorsement as described in 46 CFR 11.493(c) and 11.495(c).

6. **(**ADDED 07/07/14**) Q – I currently hold a national endorsement as mate (OSV) 3,000 GT (ITC). What are the requirements to upgrade to a national endorsement as Master (OSV) 3,000 GT (ITC)?**

As stated in 46 CFR 11.493(b), the minimum service required to qualify an applicant for a national endorsement as master (OSV) of 1,600 GRT/3,000 GT or more is 24 months of total service as mate, chief mate, or master of ocean or near-coastal and/or Great Lakes on self propelled vessels of more than 100 GRT. At least one-half of the required experience must be served as chief mate. The national endorsement also requires completion of an examination. Those mariners seeking this endorsement, with service or training that began before March 24, 2014, may qualify under the regulations in effect at that time, which included meeting the appropriate requirements of STCW Regulation II/2.

7. (**ADDED 07/07/14**) Mate (OSV) tonnage limitations: I was recently issued an MMC endorsement as mate (OSV). It does not have a tonnage limitation on it. What tonnage OSVs can I serve on?

Mariners with a national endorsement as mate (OSV) may serve on any vessel **inspected and operated** as an offshore supply vessel, regardless of its tonnage.

STCW Frequently Asked Questions: Towing Endorsements

1. **(**ADDED 02/14/14**) How does a limited tonnage master of towing vessels, 200 GRT tons or less, remove the tonnage limitation?**

To remove a tonnage limitation from a master of towing vessel endorsement, an applicant must submit 24 months of service as master or mate (pilot) of towing vessels, 90 days recent service within the last 3 years, and either successfully complete an approved steersman course within the last year or pass the following exams for the route(s) requested: Rules of the Road, Navigation and Chart Navigation, Deck and Navigation General, and Deck Safety. This does not apply to any applicant with an original license or endorsement issued after 21 May 2001 who now wishes to obtain an original endorsement as Master of Towing Vessels.

2. **(**ADDED 07/07/14**) I hold an endorsement as master of towing vessels upon near-coastal waters and western rivers for domestic voyages only, 500 GT (ITC). My MMC meets the STCW 1995 regulations without further endorsement. I also have a radar observer (unlimited) certificate. I am due for renewal in July 2014. Am I eligible to apply for a 200 GRT oceans endorsement and get grandfathered into the program without returning to school and also STCW?**

Because you began your service and training before 24 March 2014, you may obtain an STCW endorsement under the previous regulations. This requires you to provide evidence of completing approved training in basic training, ARPA (if installed), GMDSS (if installed), and procedures for bridge team work.

3. **(**ADDED 07/07/14**)** The checklists that the NMC uses for both national master of towing vessels on western rivers and national mate (pilot) of towing vessels on western rivers state: “If service or training commenced after March 24, 2014 approved basic firefighting course within 5 years of application date (unless previously met)”. What this seems to state is that, after 24 March 2014 if a steersman applies for an endorsement as mate (pilot), he or she must complete a basic firefighting course and, likewise, if a mate (pilot) applies for a raise in grade to master, he or she must also complete a basic firefighting course (unless they have previously met the requirement). However, a master or mate (pilot) who started work before 24 March 2014 doesn’t have to complete a basic firefighting course; he or she would be grandfathered. Also, applicants for MMC renewals would not need to complete a basic firefighting course. Is this correct?

46 CFR 11.201(h)(3) adds a basic firefighting course requirement for national endorsements as master or mate (pilot) of towing vessels on all routes except oceans. Applicants for oceans endorsements must complete basic and advanced firefighting courses; this is not a change in the regulations. Until 24 March 2019, mariners who began service or training for mate or master of towing vessels before 24 March 2014 will not have to meet the requirement for the basic firefighting course. For a mate endorsement, this would mean they were issued the apprentice mate endorsement and have at least one day of service before 24 March 2014 after issuance of the apprentice mate endorsement. As long as the endorsement is issued before 24 March 2019 the mariner will not need to take a basic firefighting course in order to renew.

4. **(**ADDED 07/07/14**)** Does NVIC 13-14 (for Master/OICNW Less Than 500GT Near Coastal) apply to mariners holding an Operator of Uninspected Towing Vessels endorsement?

NVIC 13-14 could be applicable to mariners holding an endorsement as Master of Towing Vessels (formerly Operator of Uninspected Towing Vessels) if the mariner intends to operate on international voyages.

STCW Frequently Asked Questions: Basic Training

1. Am I required to take Basic Safety Training (BST) to get other STCW endorsements?

BST is not required for Security Awareness or VPDS. For all other STCW endorsements, valid BSTs are required. Continued competence in basic training, advanced firefighting, and proficiency in survival craft and/or fast rescue boats.

2. **(**AMENDED 07/22/15**)** Is Basic Safety Training (BST) now required to be repeated every 5 years regardless of whether a mariner sails or not? Before the Manila Amendments, the training did not have to be repeated if the mariner had recent service at sea.

Until January 1, 2017, mariners may provide evidence of having maintained the minimum standards of competence in basic training (formerly named basic safety training) by complying with 46 CFR 11.302(b) of the regulations in effect before publication of this Final Rule or documenting 12 months of service within the last 5 years. After January 1, 2017, mariners must provide evidence of maintaining the standards of competence in basic training every 5 years.

3. If a mariner has an MMC endorsed for entry-level only, but he or she sails on vessels to which STCW applies, and he or she holds a BT certificate, will the NMC now issue the VI-1 and BT endorsements on the MMC?

Yes. 46 CFR 10.109 specifies the issuance of the BT endorsement. Port state control officials may want to see the BT endorsement required by 15.1105(c).

4. **(**ADDED 02/14/14**)** Are mariners now required to renew their basic training every 5 years by attending classes all over again?

Consistent with pre-existing regulations, you must meet the renewal requirements for BT. Under this final rule, you will continue to be provided credit for your service (1 year of service within the last 5 years); however, you must also complete requirements ashore to renew the basic training on each renewal after January 1, 2017. Mariners without ongoing service will continue to be required to complete approved or accepted refresher training, or apply for a new endorsement. See 46CFR 11.302(b)-(e) and 12.602(b)-(e).

5. **(**ADDED 02/14/14**)** Since the name of basic safety training (BST) has now been changed to basic training (BT), should the schools change the names of their courses to match the new language in the BT NVIC as we renew?

While not required, and in order to avoid confusion, schools with approved BST courses are recommended to change the course name to basic training during their next renewal cycle.

6. **(**ADDED 02/14/14**)** With regard to basic training, what do you mean in NVIC 02-14 by the term “assessment conducted ashore”?

Some of the requirements for renewal or revalidation of the basic training endorsement cannot be performed safely onboard a vessel. Therefore, these components must be successfully demonstrated in Coast Guard approved training ashore.

These competencies are listed in 46 CFR 11.302(d) and 12.602(d), as well as in enclosure (1) of NVIC 08-14, “Guidelines for Qualification for STCW Endorsements in Basic Training (Formerly Basic Safety Training)”.

Beginning on 1 January 2017, these shoreside assessments must be completed every 5 years when renewing the basic training endorsement and/or your MMC.

7. **(**ADDED 02/14/14**)** Can I demonstrate onboard training and experience, through evidence of 1 year of sea service within the last 5 years, or do I have to take additional classes in order to renew my basic training endorsement?

Until 31 December 2016, you may demonstrate onboard training and experience through evidence of 1 year of sea service within the last 5 years. After that date, you must comply with the requirements of 46 CFR 11.302(d), since this requirement for renewal or revalidation of the basic training endorsement cannot be performed safely onboard a vessel.

8. **(**ADDED 02/14/14**)** Do mariners have to meet the new renewal requirements for basic training by 1 January 2017, or will it be at first renewal after 1 January 2017?

A – Mariners must comply with 46 CFR 11.302(b) and 12.602(b), as applicable, at the first renewal after 31 December 2016. Until that date, mariners may renew using the regulations and policy in effect before 24 March 2014.

9. (ADDED 02/14/14**) Will the Coast Guard accept sea service earned on a vessel operating inside the boundary line towards renewal of a basic training endorsement?**

Yes, the Coast Guard will accept inland service towards renewal of a basic training endorsement. You must demonstrate onboard training and experience, through evidence of 1 year of sea service within the last 5 years, on or after 1 January 2017. You will also have to document completion of shoreside assessments.

10. (ADDED 07/07/14**) If an entry level mariner who sails on vessels to which STCW applies wants to qualify for a basic training (BT) endorsement, what does he or she need to provide to the Coast Guard in order to apply for the endorsement besides a CG-719? Is there a fee, does he or she need a physical examination and, if so, which one? Does he or she need to provide the results from a drug test? What does he or she need to provide as proof of continued proficiency in BT? Can he or she show prior BT certificates and one year of sea service or does he or she need to provide certificates within the past 5 years?**

46 CFR 10.209 provides the general application requirements for merchant mariner credentials (MMCs), which includes requirements to undergo a drug test and physical examination. Entry level endorsements, for those serving on vessels to which STCW applies, must complete at least a CG-719K/E. The requirements for basic training (BT) may be found in 46 CFR 12.602. Renewal requirements for a BT endorsement are located in 12.602 (b) through (e). There is no fee associated with any STCW endorsement.

11. (ADDED 07/07/14**) If I renew my MMC now, and can provide proof of 12 months of sea service in the previous five years, will my renewed MMC satisfy the STCW basic training component of this final rule until my next renewal date? If not, what do I need to do to ensure that my MMC will be compliant with the STCW requirements for the next five years?**

Twelve months of seagoing service in the previous 5 years will meet the renewal requirements until the first renewal transaction after 31 December 2016. Where an STCW endorsement was required by the Coast Guard or where the vessel is conducting regular drills, inland service can be acceptable for renewal of basic training during the transition period.

12. (ADDED 07/07/14**) Firefighting: In accordance with STCW, there is a requirement for seafarers on fire teams to have basic fire fighting training. What is the requirement for firefighting training on a MODU if the seafarer is: 1) a rated seafarer on a fire team; and 2) a rated seafarer not on a fire team?**

Any credentialed seafarer, whether assigned to a fire team or not, serving on a MODU to which STCW applies must comply with the requirements of 46 CFR 12.602. That regulation states all applicants seeking an STCW rating endorsement must provide evidence of meeting the standard of competence for basic training. One of the elements of basic training is fire prevention and firefighting, as set out in Table A–VI/1–2 of the STCW Code.

13. (ADDED 07/07/14**) If I take a basic training (BT) course now, is it good for 5 years, or do I have to re-take it based on the BT renewal requirements valid after January 1, 2017?**

If you take a BT training course now, the course will be valid for 5 years from the date on the course completion certificate. At the first renewal of your merchant mariner credential after 1 January 2017 you must provide evidence of maintaining the standard of competence for BT. (See 46 CFR 11.302(b) or 12.602(b).)

14. (ADDED 07/07/14**) I cannot meet the requirement for one year of sea service within the last five years. Do I need to take a 3-day or a 5-day refresher basic training course?**

You would need to take an approved basic training course or approved or accepted refresher training course. See 46 CFR 11.302(e). The length of the course would depend upon the length necessary for the course provider to cover the material required to be in the course. The National Maritime Center's website at <http://www.uscg.mil/nmc> has a listing of all approved basic training and basic training refresher courses.

15. (ADDED 07/07/14**) I completed a lifeboatman course which included the first three sections of basic training (BT). It seems as though I simply need to complete firefighting in order to complete the BT requirements for STCW. Is that true? Or are there other courses or more paperwork that I would have to fill out?**

The four sections of BT are: 1-1 Personal Survival Techniques; 1-2 Fire prevention and Fire Fighting; 1-3 Elementary First Aid; and 1-4 Personal Safety and Social Responsibilities. If the lifeboatman course you took is also Coast Guard approved to meet sections 1-1, 1-3, and 1-4 of BT, then you need only complete a Coast Guard course approved for BT section 1-2 in order to meet all training requirements for an endorsement of BT. Additionally, for mariners serving on vessels to which STCW applies, applicants for entry level endorsements must complete at least a CG-719K/E. The requirements for BT may be found in 46 CFR 12.602. Renewal requirements for a BT endorsement are located in 12.602 (b) through (e). There is no fee associated with any STCW endorsement.

16. (ADDED 07/07/14**) STCW FAQ #4 for basic training states that, under the final rule, mariners with 1 year of sea time must also complete requirements ashore to renew the basic training (BT) endorsement at each renewal after January 1, 2017. It also refers to a refresher course for those who do not have the 1 year of sea time in the last 5 years. How exactly are the requirements ashore fulfilled for those with the required sea service? This is also referenced in question #10 in the STCW-FAQ General Questions section, which refers to revalidation for those with appropriate sea service. What is the difference between those who fall under the category of revalidation, and others who fall under the need for a refresher course and how does a mariner revalidate?**

For those mariners who have the required 1 year of sea time in the previous 5 years, some of the requirements for renewal of the BT endorsement cannot be performed safely onboard a vessel. Therefore, these components must be successfully demonstrated in Coast Guard approved revalidation training ashore. Those mariners who cannot meet the requirement for 1 year of sea service within the last 5 years will be required to complete approved or accepted refresher training, or apply for a new endorsement.

17. (ADDED 07/07/14**) STCW FAQ #4 for basic training (BT) states that mariners must comply with 46 CFR 11.302(b) and 12.602(b) at their first renewal after December 31, 2016. If a mariner renews his or her MMC before that date, will there be any limitations in the STCW portion of the MMC pertaining to BT after January 1, 2017, or when I revalidate for the first time after January 1, 2017?**

No, you will receive no limitation; however, you will be required to show evidence of meeting the continued competence in BT at your first renewal after December 31, 2016.

18. (ADDED 05/27/15**) If a mariner has 1 year (360 days) of relevant seagoing service in the last 5 years, is he or she required to take a BT Refresher course?**

Under the new regulations, every 5 years mariners must demonstrate that they retain the standards of competence for BT and advanced firefighting. For mariners who have 1 year of sea service during the previous 5 years, some of the competencies for BT can be demonstrated by having 1 year of sea service, but others that cannot be reasonably or safely demonstrated aboard ship need to be completed ashore. This may be done in a BT revalidation course that only covers the competencies and KUPs that cannot be done onboard ship. For mariners who do not have the 1 year of service in the previous 5 years, all competencies and KUPs must be demonstrated ashore in either a refresher course, or by re-taking the original course. Until December 31, 2016, applicants can qualify for BT renewal through completion of approved training or 1 year of sea service in the last 5 years.

19. (ADDED 05/27/15**) Advanced Firefighting: Regarding NVIC 09-14, will mariners who provide evidence of 1 year (360 days) of sea service in the last 5 still need to take an advanced firefighting refresher course?**

If a mariner has at least 1 year of sea service in the past 5 years, and he or she also completes the revalidation course described in 46 CFR 11.302(d), he or she not need to take an advanced firefighting course.

20. (ADDED 05/27/15**) When does the requirement to demonstrate continued competency in BT and/or advanced firefighting go into effect?**

The requirement to demonstrate continued competence in BT will take effect on the first renewal or raise of grade of an STCW endorsement that occurs after December 31, 2016.

21. (ADDED 05/27/15**) How often does the BT and/or advanced firefighting refresher or revalidation courses need to be taken?**

Mariners required to be proficient in BT or advanced firefighting must show that they have either had 1 year of service in the previous 5 years and completed a revalidation course in the previous 5 years, or that they have taken an approved comprehensive refresher course or complete original courses within the previous 5 years.

NOTE: *This applies to more than just applying for an original or renewal of an MMC, it also applies for port state compliance matters when mariners are required to have valid BT OR advanced firefighting to serve in their shipboard assignments.*

22. (ADDED 05/27/15**) In certain positions on our current Safety billet (i.e., Steward/Stewardess) have safety responsibilities for the mustering of passengers. Can these positions be limited in their training requirements to just Crowd and Crises management? Or will they also require Basic Training?**

Those persons serving in safety and environmental protection positions would require basic training. This training will either be documented as an endorsement on a credential or if no credential is issued the vessel will need to carry the documentary evidence. See 46 CFR 15.1105.

23. (ADDED 07/22/15**) Refresher. I have a question regarding an STCW certification. I received a certificate from one of my employees that states he has completed a Basic Safety Course (Refresher), which included the following:**

**Personal Survival Techniques (STCW A-VI/1-1);
Fire Prevention & Fire Fighting (STCW A-VI/1-2);
Elementary First Aid (STCW A-VI/1-3); and
Personal Safety & Social Responsibility (STCW A-VI/1-4).**

However, at the bottom of the certificate, it says: "Using the STCW 1978 Convention as amended, as guidelines, and for having been assessed by a qualified assessor in accordance with the approved method and criteria". Would this be a valid certificate if it states STCW 1978 or should it have STCW 95 listed instead? This certificate was issued in the Philippines on October 9, 2012.

Can you please advise?

The official title of the Convention is the International Convention on Standards and Training, Certification, and Watchkeeping for Seafarers, 1978, therefore it would be appropriate to refer to the Convention as STCW 1978 as amended.

24. (**ADDED 09/15/15**) I know all the literature says that Basic safety revalidation must be completed by first upgrade or renewal after 2014. Does this apply if sailing on a U.S. Flagged vessel that is currently working overseas in the Black Sea? My concern is if inspected by Port State control in Romania we should have the Basic Safety Training revalidation prior to 01 Jan 2017.

Basic training revalidation was required as part of the renewal process for your current credential. At your first renewal after January 1, 2017, you will be required to complete the revised training requirements to revalidate basic training. As such, the current STCW basic training meets the requirements of STCW until your next renewal.

STCW Frequently Asked Questions: National – Officer – Deck

- 1. Master of ocean or near-coastal self-propelled vessels of less than 1,600 GRT. I am having some trouble understanding the changes that are being proposed to the service requirements for master 1,600 GRT (11.412). According to my reading of the new regulations it appears that they allow for upgrade from 1,600 GRT mate to 1,600 GRT master with only one year of sea time as long as the year was on vessels over 100 GT and you held either a 1,600 GRT mate oceans or a 1,600 GRT mate of towing. Is my interpretation correct?**

Yes, a mariner holding an endorsement as mate of self-propelled vessels of less than 1,600 GRT or as master or mate/pilot of towing vessels and who has 12 months' service as master or mate on seagoing vessels over 100 GRT may upgrade to master of self-propelled vessels of less than 1,600 GRT.

- 2. (**ADDED 07/07/14**) Master, 500 GRT endorsements: Does an applicant for the national master 500 GRT/1,600 GT (ITC) near-coastal endorsement have to qualify as an able seaman?**

No. Consistent with page 77851 of the preamble to the final rule, applicants for this national endorsement are no longer required to qualify as an able seaman.

- 3. (**ADDED 07/07/14**) Signaling (flashing light): Are mariners upgrading to national endorsements of unlimited tonnage required to complete flashing light? This requirement is not in 46 CFR 11.401 (h) in the final rule. When will mariners need to complete signaling?**

Mariners seeking national deck officer endorsements do not need to complete a signaling course. However, mariners should be aware that there may be questions concerning visual signaling on national endorsement examinations.

Mariners qualifying for a national endorsement under the grandfathering provisions do not need to meet the requirements of the old 46 CFR 11.401(h).

4. **(**ADDED 07/07/14**) First class pilots: What are the requirements for pilots regarding the new STCW regulations for tracking and compliance as it applies to the new regulations?**

If a pilot holds or wishes to apply for STCW endorsements, he or she is subject to the same requirements as other mariners to obtain and maintain those endorsements.

5. **(**ADDED 07/07/14**) First class pilots: What will I be required to do to keep my documents current if I am serving as pilot and I hold a master (unlimited) endorsement?**

The general renewal requirements for MMCs are found in 46 CFR 10.227. The renewal requirements for an STCW endorsement as master of vessels of 3,000 GT (ITC) or more are found in 46 CFR 11.305 (b). The requirements for maintaining current knowledge of waters to be navigated by a pilot may be found in 46 CFR 11.713.

6. **(**ADDED 07/07/14**) For the sea service required in 46 CFR 11.404 (a)(1) for a national endorsement as master (unlimited), does the required service as chief mate have to be on vessels of a specific tonnage, and, must the service be obtained while holding an endorsement as chief mate of unlimited tonnage?**

All applicants for a national endorsement as master (unlimited) must have either: 1 year of service as chief mate on ocean self-propelled vessels; or 1 year of service on vessels of unlimited tonnage while holding a license or MMC endorsement as chief mate of ocean self-propelled vessels. At least 6 months of this service must be as chief mate, and the remainder may be as second mate, third mate, or officer in charge of a navigational watch accepted on a one-for-two basis (12 months as officer in charge of a navigational watch equals 6 months of creditable service).

7. **(**ADDED 07/07/14**) Third Mate Unlimited: If a mariner has a national endorsement as master for service on vessels of less than 1,600 GRT, is it possible for him or her to obtain an endorsement as third mate for service on vessels of unlimited tonnage?**

Yes, per 46 CFR 11.407, you may qualify for the endorsement however, if at least half of your service is not on vessels of more than 1,600 GRT your endorsement will receive a tonnage limitation per 46 CFR 11.402(b).

8. (ADDED 07/07/14**) Radar Observer: Will radar observer completion date become part of the MMC or will we have to carry a course completion certificate?**

No, the STCW Final Rule did not change how the radar observer endorsement appears on the MMC. Removing the date occurred in an earlier rulemaking to reduce the burden for mariners by eliminating the need to have the endorsement re-issued each time the radar endorsement was renewed. Mariners with a radar endorsement should continue to carry the current course completion certificate or have it readily available.

9. (ADDED 07/07/14**) Will mariners with the new endorsement of Chief Engineer (limited) be qualified to sail on international voyages, even if they were previously limited to near-coastal voyages?**

Chief Engineer (limited) is not an STCW endorsement, but a national endorsement (see 46 CFR 11.518). In order to sail internationally on vessels subject to the STCW, a mariner holding a national endorsement as chief engineer (limited) would first need to obtain an STCW endorsement. The requirements for an STCW endorsement as chief engineer are in 46 CFR 11.325 (for 4,000 HP or more) or 46 CFR 11.331 (for 1,000 HP or more and less than 4,000 HP). However, if you held your national chief engineer endorsement before 24 March 2014 or began the service or training for your STCW endorsement before that date, you may qualify for the STCW endorsement under the old rules until 31 December 2016.

10. (ADDED 07/07/14**) Master unlimited: I currently hold an endorsement as master OSV 6,000 GT (ITC) and have been working under the authority of that license as a master for several years on vessels over 3,000 GT (ITC). I received an endorsement as third mate unlimited last year. Under the final rule, would I be able to by-pass the chief mate unlimited examination and take the examination for master unlimited?**

No, in order to be qualified for the national endorsement as master unlimited, you must meet the professional requirements in 46 CFR 11.404 and be approved to test for that endorsement. For a quick reference on the structure of the national deck officer endorsements and the crossover between those endorsements, refer to 46 CFR Figure 11.403.

11. (ADDED 07/07/14**) I am going from a national chief engineer (limited oceans) endorsement to a second assistant engineer (unlimited) endorsement which is not a management position. Why do I have to take another examination for an endorsement with less responsibility? Why can't those who took the examination for chief engineer (limited oceans) be grandfathered to a national endorsement as second assistant or third assistant engineer, even if it would require us to obtain more sea service time if we want to obtain a management endorsement?**

You must take an examination, because it is a requirement of the regulations. Under 46 CFR 11.514(c) which was in effect before 24 March 2014, a mariner may qualify for a second assistant engineer endorsement based on his or her chief engineer (limited oceans) service. That regulation requires the completion of an examination to qualify for the sought after endorsement. Under 46 CFR 11.512(a)(2), that went into effect on March 24, 2014, he or she may qualify for first assistant engineer based on chief engineer (limited) service and completion of an appropriate examination. 46 CFR 11.903 requires an examination for both options.

12. (ADDED 05/27/15**) What endorsements must a master/mate of towing vessels with oceans or near coastal route endorsements hold to be authorized to operate towing vessels of less than 300 GRT?**

A deck officer working on towing vessels of 200-300 GRT operating beyond the boundary line (on near coastal or oceans waters) must hold a national officer endorsement as master or mate of towing vessels (or master or mate of vessels greater than 200 GRT with a completed TOAR) and an STCW endorsement as master/mate authorizing service on vessels greater than 500 GT and authorizing service on the waters upon which they are serving. All officers serving on the towing vessel must hold an appropriate national and STCW endorsement authorizing service on the vessel (tonnage) and waters (oceans or near coastal waters).

STCW Frequently Asked Questions: National – Officer – Engine

- 1. Chief engineer of steam, motor and/or gas turbine-propelled vessels. Will a new MMC be issued for the chief engineer (limited) endorsement, or will both chief engineer (limited-oceans) and chief engineer (limited near-coastal) be simply recognized as the same for now?**

Mariners holding an endorsement as chief engineer (limited-oceans) or chief engineer (limited near-coastal) will be issued a chief engineer (limited) endorsement at the first credential transaction following March 24, 2014, without further sea service or examination requirements.

- 2. (**ADDED 02/14/14**) Chief engineer (limited) endorsement. Why does the chief engineer (limited) endorsement still have tonnage restrictions?**

The tonnage limitations on chief engineer (limited) endorsements reflect the maximum tonnage on which the endorsement may be used, as specified in 46 CFR 15.915(b), and reflect the limited nature of the examination and service requirements to qualify for the endorsement.

- 3. (**ADDED 07/07/14**) I hold a 1st engineers unlimited license but I am currently sailing as a 3rd Asst Engineer on a vessel with 12,000 hp and tonnage of 3500 GT ITC. The vessels manning list calls for only a Offshore Supply Vessel (OSV) Chief with unlimited horsepower and a Designated Duty Engineer (DDE) or 3rd Asst Engineer. Since there are only two engineers on the vessel am I allowed to get discharges as a 1st asst Engineer toward my Chief Unlimited License without sailing on a vessel that requires a 1st Asst Engineer on its manning list?**

The Coast Guard will accept the service towards chief engineer where it can be demonstrated that the position in which you serve was next in rank to chief engineer and that position becomes responsible for the engineering installations of the vessel in the event of the incapacitation of the chief engineer.

STCW Frequently Asked Questions: National – Rating – Deck

1. **(**ADDED 07/07/14**) We are teaching an able seaman (A/B) course and need to clarify if applicants need an endorsement as Proficiency with Survival Craft (PSC). Is an applicant for an A/B endorsement required to meet the STCW endorsement requirements as PSC and must he or she also meet the basic training requirements?**

No. To qualify for a national endorsement as A/B, 46 CFR 12.401 requires the applicant to qualify for lifeboatman. Those qualification requirements are spelled out in 46 CFR 12.407. There is no requirement for a mariner to obtain an STCW endorsement in order to hold the national endorsement as A/B.

2. **(**ADDED 07/07/14**) Lifeboatman-limited endorsements:**

1. **The new regulations for an able-bodied seaman (A/B) endorsement imply that if you have an A/B endorsement, you will also receive an endorsement as lifeboatman-limited. This conflicts with the NMC checklist for lifeboatman-limited. The regulations also appear to state that an A/B can get an endorsement for lifeboatman-limited without taking the lifeboatman exam. Is this true?**

2. **Can an approved A/B course be modified to include the requirements for a lifeboatman endorsement?**

1. The new regulations require that in order to qualify for an endorsement as A/B, applicants must have qualified for an endorsement as either lifeboatman, or lifeboatman-limited. The requirements for lifeboatman are found in 46 CFR 12.407, and those for lifeboatman-limited are in 46 CFR 12.409. The regulations for both endorsements require an examination; thus it is not possible for an applicant to qualify for an endorsement as lifeboatman or lifeboatman-limited without taking an examination of the candidate's knowledge and ability to serve as lifeboatman or life-boatman-limited.

2. A/B courses may be modified to include the requirements for lifeboatman and/or lifeboatman-limited. However, the course would need to be increased in length and would need to be about the same length as the total hours in the separate courses. In addition, as specified in 46 CFR 12.407(b)(3) and 12.409(b)(3) any course for lifeboatman or lifeboatman-limited must include practical demonstrations of ability. This would necessitate that the school use actual equipment in its courses; for lifeboatman courses, this would include a full gravity-davit lifeboat arrangement; and for lifeboatman-limited courses, a survival craft fitted with an engine (inboard or outboard) and a launching apparatus, such as a davit or crane and sling.

3. **(**ADDED 05/27/15**) Able Seamen (A/B) and lifeboatman endorsements. I would like to request clarification of 46 CFR 12.401 (d)(2), which states “After March 24, 2014, any MMC endorsed as A/B will also be endorsed as lifeboatman or lifeboatman-limited, as appropriate.” However, I have been told that the A/B would still have to take the lifeboatman course and examination. This is in conflict with the regulations, which state, very clearly, that if you have an A/B endorsement, you will also get the lifeboatman endorsement.**

As described in the Table of Changes to the final rule, 46 CFR 12.401(c)(6) revises the general requirements to obtain an endorsement as able seaman (A/B) to include holding or being qualified to hold an endorsement as lifeboatman. In addition, 46 CFR 12.407(b)(3) requires that applicants for a lifeboatman endorsement must prove to the satisfaction of the Coast Guard, by oral or other means of examination, and by actual practical demonstration of abilities, knowledge of seamanship and the ability to carry out effectively all the duties that may be for handling required of a lifeboatman.

STCW Frequently Asked Questions: National – Rating – Engine

Pending.

STCW Frequently Asked Questions: STCW – Officer – Deck

1. Will there be any limitations or restrictions placed on my credential as a result of policy letter 12-07 or the new regulations?

All limitations currently on your STCW endorsements will be retained, such as “Not valid for vessels equipped with ARPA,” unless you meet the current requirement. There is also a new limitation with regard to Electronic Chart Display Information Systems (ECDIS). Any application that is in process for an endorsement as Chief Mate, Master, or OICNW will have a limitation added to their endorsement stating they are not qualified to work on a vessels equipped with ECDIS after December 31, 2016, unless they can show successful completion of a Coast Guard approved or accepted ECDIS course.

2. Why isn't ECDIS endorsed?

ECDIS is a part of the STCW required competencies for master, chief mate, and OICNW, it is not itself an endorsement. If you do not have approved ECDIS training, your STCW endorsement(s) for master chief mate, and/or OICNW will have a limitation indicating that it is not valid for vessels with ECDIS after December 31, 2016.

3. If I had the ECDIS limitation placed on my MMC and I apply to have it removed, does this result in a new MMC book? Or will they reprint an endorsement with my highest officer capacity showing no ECDIS limitation?

In most cases, NMC will issue you the endorsement without the ECDIS limitation to add to your existing MMC book.

4. I am a 2nd Mate and qualify for unlimited OICNW and have a Master 1,600 Oceans. Why do I have the 1,600 tonnage limitation?

This limitation will only apply to your endorsement as Master. Your endorsement for OICNW, which corresponds to your 2nd Mate endorsement, will not have a tonnage limitation.

5. **(**ADDED 07/07/14**) Electronic Chart Display & Information System (ECDIS): If a master or mate is on a vessel that does not have ECDIS, and they have not received ECDIS training, will their MMC contain an endorsement limiting them to service on vessels without installed ECDIS?**

Yes. 46 CFR 11.301(e) states that training and assessment in the use of ECDIS is not required for those who serve exclusively on ships not fitted with ECDIS. However, if the mariner cannot provide evidence of ECDIS training, a limitation will be placed on his or her STCW endorsement limiting service to vessels that are not equipped with ECDIS.

6. **(**ADDED 07/07/14**) Global Maritime Distress and Safety System (GMDSS): Does 11.315(a)(3)(vi) refer to a vessel that is carrying GMDSS equipment due to a regulatory requirement or does it include a vessel that only has a DSC VHS radio onboard?**

46 CFR 11.315(a)(3)(vi) refers to a vessel that is carrying GMDSS equipment due to regulatory requirement. The VHF (or HF) Digital Selective Call (DSC) radio would be only one of the pieces of equipment in a GMDSS suite. Having only a DSC radio on a vessel that is not required to carry GMDSS does not require officers serving onboard this vessel to undergo GMDSS training. Please refer to the following link as it provides useful GMDSS carriage information: <http://rtcm.org/gmdssguide.php>.

7. **(**ADDED 07/07/14**) Once a mariner has completed all the training that is required for an STCW endorsement as chief mate, is there any additional training requirements in order to obtain a master's endorsement, or is only additional sea time required?**

As discussed in 46 CFR 11.305, if a mariner has already completed all of the training requirements to obtain an STCW endorsement as chief mate on vessels of 3,000 GT or more (management level), he or she only needs to provide evidence of the appropriate sea service and the gap closing requirements, if not already completed, in order to obtain an STCW endorsement as master on vessels of 3,000 GT or more (management level).

8. **(**ADDED 07/07/14**)** According to the Final Rule, 11.307, Requirements to qualify for an STCW endorsement as chief mate on vessels of 3,000 GT or more, “Provide evidence of having satisfactorily completed approved training in the following subject areas; (I-IX).” Can a mariner complete training by having all of the required assessments listed in Policy Letter No. 04-02 signed off during onboard training or must he or she complete an approved chief mate/ masters programs?

The transitional provisions for chief mate 3,000 GT or more are found in NVIC 02-14 enclosure 2 table 2 on page 14.

9. **(**ADDED 07/07/14**)** Renewal: I understand that I need to take basic training and leadership classes by 1 January 2017. My question is, do they have to be the full class, or can they be a refresher class, if I have already taken these classes in the past and I have been working at sea for about 7 years?

Mariners who apply for an STCW officer endorsement with service before 24 March 2014 need to meet the gap closing training identified in NVIC 02-14 which for deck officers requires the appropriate leadership skills training and ECDIS. (If serving on a vessel so equipped, a limitation will be applied if not completed.) For engine officers, this training would include engine room management and the appropriate leadership skills, and for engine management endorsements, management of electrical and electronic control equipment.

10. **(**ADDED 07/07/14**)** Officer in Charge of a Navigational Watch (OICNW): 46 CFR11.309 requires “approved training” in emergency procedures for OICNW. But Column 3 of Table A-II-1 allows a KUP to be demonstrated in four different ways. Will any of those four ways be accepted as satisfying the requirement imposed by STCW or will only one way be permitted? This is just one example of the flexibility of STCW (as described in 46 CFR11.301) perhaps being limited by the rules.

The new regulations specify those areas where “approved training” is required. The regulations do not specify the type of approved training: classroom, training ship, e-learning, etc. It is up to the industry, including training institutions, to submit their training for approval.

11. (ADDED 07/07/14**) STCW endorsement as master 500 GT or more and less than 3,000 GT: I hold a national endorsement as master of steam and motor vessels of not more than 1,600 GRT/3,000 GT (ITC) upon oceans. For vessels less than 200 GRT/500 GT (ITC) on domestic voyages only, the holder of this credential meets the STCW 1995 regulations without further endorsements.” What are the minimum requirements I would have to meet to obtain an STCW endorsement?**

In order to qualify for an STCW endorsement as master on vessels of 500 GT or more and less than 3,000 GT, you must meet the minimum requirements found in 46 CFR 11.311. However, mariners with service and training before 24 March 2014 are eligible for the grandfathering provisions found in 46 CFR 11.301(g)(3) and explained in NVIC 02-14.

12. (ADDED 07/07/14**) Master unlimited: 46 CFR 11.305 seems to say that a mariner can move directly from a 1,600 GRT/3,000 GT oceans master’s endorsement to an unlimited master’s endorsement by taking classes in: advanced shiphandling; advanced stability; advanced meteorology; leadership and managerial skills; search and rescue; ARPA; and ECDIS. This section does not require testing for the unlimited master’s endorsement. Is this correct?**

Yes. The United States has not made examination a requirement to obtain an STCW endorsement; however, an examination is required in order to obtain the associated national endorsement. 46 CFR 11.305 (d) states that seafarers holding an STCW endorsement as master of vessels of 500 GT or more and less than 3,000 GT, in accordance with 46 CFR 11.311, are eligible to apply for the STCW endorsement as master on vessels of 3,000 GT or more upon completion of six months of sea service, under the authority of the endorsement. Applicants for this endorsement must also complete any items in 46 CFR 11.305(a)(2) (assessments) and (a)(3) (training) not previously completed. Additionally, applicants for this endorsement would also have to meet the requirements for an appropriate national endorsement as required by 46 CFR 11.201(a) which may have different service requirements from those STCW endorsement requirements found in 46 CFR Part 11 Subpart C.

- 13. (**ADDED 07/07/14**) I am trying to get my STCW OICNW 500 GT endorsement. The NMC check list, under sea service, requires “360 days as part of an approved training program, which includes onboard training that meets the requirements of section A-II/1 of the STCW code.” Where can I find information on section A- II/1 of the STCW Code or what training it requires?**

If a mariner has service before 24 March 2014 he or she may qualify under the requirements existing before that date. This includes the policy and assessments published in policy letter 11-07, which is located on the NMC website. Candidates who apply for a credential based on approved or accepted training or approved seagoing service that was started on or after 24 March 2014, or who apply for the MMC endorsement on or after 1 January 2017 must meet the requirements of 46 CFR 11.309. Further guidance applicable to those mariners is found in NVIC 12-14 which is also located on the NMC website.

- 14. (**ADDED 07/07/14**) Can a mariner obtain an STCW endorsement as master on vessels of 3,000 GT or more without first obtaining a national endorsement or is there a route to get the national endorsement that is not currently listed in the regulations?**

No, 46 CFR 11.201(a) specifies that an applicant for any STCW endorsement must hold the appropriate national endorsement unless otherwise specified.

Applicants for this STCW endorsement (authorizing service on vessels of 3,000 GT or more) must hold a national officer endorsement authorizing service on vessels of 1,600 GRT/3,000 GT or more in order to qualify for the STCW endorsement as master on vessels of 3,000 GT or more.

- 15. (**ADDED 07/07/14**) If a mariner is applying for an endorsement as master on vessels of 3,000 GT or more under 46 CFR 11.305(d), from master 500 to 3,000 GT, the NMC checklists for the national endorsement do not list this as an option, while the NMC checklists for the STCW do list this as an option.**

The regulations in 46 CFR Part 11, Subpart D do not provide a path from master of self-propelled vessels of less than 1,600 GRT to master of self-propelled vessels of unlimited tonnage, so that path is not on the checklist for the national endorsement. See 46 CFR 11.404 for the service requirements for master of ocean or near-coastal self-propelled vessels of unlimited tonnage. The STCW checklist for master on vessels of 3,000 GT or more does provide the path from master on vessels of 500 to 3,000 GT, since it would be applicable to master of OSV who are authorized to operate on vessels of 3,000 or more. (See 46 CFR 11.493.)

16. (ADDED 07/07/14**) If a mariner holds an STCW endorsement as OICNW on vessels of less than 500 GT (46 CFR 11.319), is there a minimum tonnage for the vessels served on as master while holding that endorsement and applying for an upgrade to master on vessels of 3,000 GT or more?**

There is no tonnage requirement for the OICNW service specified in 46 CFR 11.305(a)(1). However, as stated in 46 CFR 11.201(a), mariners must also hold the appropriate national officer endorsement authorizing service as master on vessels of 3,000 GT (1,600 GRT) or more or 500 GRT or more, and must meet any service requirements applicable to the national endorsement, before they can apply for an STCW endorsement as master on vessels of 3,000 GT or more.

17. (ADDED 07/07/14**) Chief mate (unlimited): According to the final rule, 46 CFR 11.307 requires that, in order for an applicant to qualify for an STCW endorsement as chief mate on vessels of 3,000 GT or more, he or she must provide evidence of 12 months of service as OINCW on vessels operating in Oceans. Will 12-hour days be counted as day and a half service for each 12 hours worked in a 24-hour period?**

Not in all instances. On vessels authorized to operate a two-watch system by 46 U.S.C. 8104 and 46 CFR 15.705, a 12-hour working day may be creditable as 1 1/2 days of service.

18. (ADDED 05/27/15**) Master 100 GRT endorsement: With regard to the requirements for an STCW endorsement as Master 100 GRT, I found the following in the MMC checklist (mcp_fm_nmc5_66_web.pdf) but could find no similar language in the regulations. Is this correct? Master 100 GRT needs only BT and the STCW endorsement will be limited to 100 GRT, 50, or 25 GRT based upon submitted service experience.**

The checklist on the NMC website reflects the policy and practice in place and is applicable to those mariners who began service or training before March 24, 2014. Those mariners who began service or training on or after that date and for all mariners after January 1, 2017, will be required to meet the requirements found in the regulations in 46 CFR 11.315 for oceans waters and 11.317 for near coastal waters.

19. (ADDED 07/22/15**) I have a 100 GRT domestic master's endorsement. When I renewed it, the STCW '95 endorsement was not included, as it had been on my old credential. Is there a reason why this STCW endorsement was not included and, if so, what do I need to do to obtain the STCW endorsement?**

The recent STCW rulemaking added requirements for STCW endorsements, including endorsements for mariners on vessels less than 500 GT (200 GRT) on near-coastal voyages.

Your previous endorsement most likely specified that it was limited to near-coastal, domestic voyages. Mariners serving on small vessels engaged exclusively in near-coastal, domestic voyages do not require an STCW endorsement [see 46 CFR 11.301(h)]. As an STCW endorsement is not required on near-coastal domestic voyages, it is no longer necessary to add such an endorsement to your credential. If a mariner intends to serve on a vessel that is subject to STCW, he or she must meet the requirements for an endorsement as master of vessels of less than 500 GT limited to near-coastal waters [see 46 CFR 11.317].

20. (ADDED 09/15/15**) NVIC 10-14 and NVIC 11-14 Record of Assessment: The performance condition for task 11.1.B, "Prepare a loading and discharge plan", does not require it to be done in a course. It is required to be performed "on board a ship, or in a laboratory, when given information concerning a future cargo operation and given ship stability data for a vessel of at least 1,600 GRT or 3,000 GT and/or use of vessel specific software." The NVIC 10-14 and 11-14, Record of Assessment (enclosure 3) does not have a box for the assessor to initial (it incorrectly says course). Again the performance condition (enclosure 2) gives individuals the option to get it signed off onboard (or in a laboratory) as part of a class. This is a clear mistake in the record of assessment. Please confirm that the NMC will accept this task signed off outside of a course if an individual has 11.1.B in the record of assessment initialed where it says course.**

You are correct; task 11.1.B does not have to be performed in a course. The assessment MAY be done in a course. If it is performed in a course, the approval of the course will either note that completing the course is evidence of successful completion of the assessment (if assessment is mandatory to complete the course), or the approval will note that an assessor may sign a student's Record of Assessment for a successful demonstration (when the assessment is not a mandatory part of the course).

Also, you are correct, the shading of the box and addition of "course" in NVIC 10-14 and 11-14 Enclosure (3) (Record of Assessment) was an error. It will be corrected when the NVIC is revised.

STCW Frequently Asked Questions: STCW – Officer – Engine

1. Please define the requirements for electronics technician and electronics support mariners.

The requirements for an endorsement as electro-technical officer may be found in 46 CFR 11.335 and those for electro-technical rating may be found in 46 CFR 12.611. Guidance will be provided in a forthcoming NVIC, including demonstrations of competence. The Coast Guard will not issue these endorsements until this guidance is published.

2. (ADDED 02/14/14**) Electro-technical officer. Does an applicant for an STCW endorsement as electro-technical officer have to have an officer endorsement?**

No, 46 CFR 11.335(d) does not require an applicant for an STCW endorsement as electro-technical officer to hold any other national or STCW officer endorsement.

3. (ADDED 07/07/14**) What classes am I going to have to take before I renew my national and STCW chief engineer (unlimited) endorsements in 2016?**

There are no changes in these regulations to renew your national endorsement. With regard to your STCW endorsement, 46 CFR 11.325(b) states that, for a renewal of an STCW endorsement, without limitation, to be valid on or after 1 January 2017, each candidate must provide evidence of successful completion of approved training in the following:

- (1) ERM if not completed at the operational level;
- (2) Leadership and managerial skills; and
- (3) Management of electrical and electronic control equipment.

4. (ADDED 07/07/14**) Can you please advise:**

(1) When will the courses required for renewal of an STCW endorsement as chief engineer (11.325(b)) be available at approved schools?

(2) How long will the certificates of completion for these courses be valid (1 year, 5 year, unlimited)?

(3) Are these courses required once in a lifetime or do they have to be taken every five years?

(1) As discussed in 46 CFR 10.402, organizations desiring course approval by the Coast Guard must submit a written request and a complete curriculum package to the National Maritime Center for consideration of approval. Availability will depend upon course submission.

(2) The course completion certificate will need to be submitted within 5 years of course completion.

(3) These courses (listed in 46 CFR 11.325(b)) must only be completed once provided the course completion certificate is submitted to the Coast Guard within 5 years of course completion.

5. (ADDED 07/07/14**) 46 CFR 11.325(a)(3)(i) states that to qualify for an STCW endorsement as chief engineer officer, an applicant must provide evidence of having satisfactorily completed approved training in engine room resource management (ERM) if not completed at the operational level. What does “operational level” mean?**

As defined in 46 CFR 10.107, “operational level” means the level of responsibility associated with—

(1) Serving as officer in charge of a navigational or engineering watch, or as designated duty engineer for periodically unmanned machinery spaces, or as radio operator onboard a seagoing ship; and

(2) Maintaining direct control over the performance of all functions within the designated area of responsibility in accordance with proper procedures and under the direction of an individual serving in the management level for that area of responsibility.

6. **(**ADDED 05/27/15**)** If someone who holds a DDE 4,000 HP endorsement already has an STCW III/3 designation from the old system, will that STCW endorsement renew when he upgrades or renews? I did not find exact verbiage to back that up. The table in Enclosure (3) of NVIC 02-14 simply states STCW Engineer Officer Endorsement 4,000 HP which could mean a few different things and could easily exclude DDE.

If a mariner currently holds an STCW III/3 endorsement and applies for renewal, he or she will receive that endorsement regardless of the national endorsement they hold. However, the endorsement may receive a limitation as discussed in NVIC 02-14 (Table 1 of enclosure (2)).

7. **(**ADDED 05/27/15**)** I hold a U.S. chief engineer's endorsement, but work overseas on non-U.S. flagged vessels with an international crew. 46 CFR 11.325 states that in order for me to renew and retain my endorsement I will need to meet additional training requirements. Is it acceptable to take these courses at a training provider that is not located in the U.S. and therefore is not directly USCG approved?

No. 46 CFR 11.325(b) specifically states that applicants for renewal of an STCW chief engineer's endorsement must provide evidence of having satisfactorily completed approved training in those areas for their STCW endorsement to be valid on or after January 1, 2017.

For additional information, see definitions for "approved training" and "Coast Guard-accepted" in 46 CFR 10.107.

8. **(**ADDED 05/27/15**)** STCW OICEW endorsement renewal requirements. My third assistant engineer unlimited license and STCW OICEW endorsement expire in 2018. Will I need to take any training courses before the January 1, 2017 deadline? If so, what courses will I need?

No, you do not need to take training courses before January 1, 2017; however, when you renew your OICEW endorsement, you must provide documentary evidence of satisfactorily completing ERM training and meeting the standard of competence in leadership and teamworking skills for the OICEW endorsement.

9. **(**ADDED 07/22/15**)** Electro-Technical Officer (ETO): I am serving as an ETO. What requirements do I need to meet to get that endorsement?

In order to receive an endorsement as ETO, you must meet the requirements of 46 CFR 11.335 as implemented by NVIC 24-14.

STCW Frequently Asked Questions: STCW – Rating – Deck

- 1. RFPNW/able seafarer-deck endorsements. In order to qualify for an endorsement as able seafarer-deck (or engine), is it sufficient for an able seaman to hold an endorsement for rating forming part of a navigational watch (RFPNW) or (for engineer ratings) for a QMED to hold an endorsement for rating forming part of an engineering watch (RFPEW)?**

As stated in 12.603(b), until January 1, 2017, seafarers will be considered to have met the requirements for able seafarer-deck if they have served as a watchstanding A/B or as an RFPNW for a period of not less than 12 months within the 60 months prior to application. If you can't qualify above, than 12.603(c) states that seafarers holding a rating endorsement as able seaman before January 1, 2017, will be eligible for the A/S-deck endorsement upon showing evidence of ; (1) Holding an endorsement as an RFPNW; and (2) Having satisfactorily completed approved training in—(i) Proficiency in survival craft and rescue boats, other than fast rescue boats (PSC); or (ii) Proficiency in survival craft and rescue boats, other than lifeboats or fast rescue boats-limited (PSC-limited), as appropriate.

46 CFR 12.607(b) and (c) have similar language for able seafarer-engine endorsement applicants.

- 2. Do I need to currently hold RFPNW to get an AS-D?**

No.

- 3. Is there is a scenario where I do not need to qualify for RFPNW or RFPEW to get AS-D or AS-E?**

No. STCW requires Able Seafarers to qualify for RFPNW or RFPEW. Some mariners who are applying for Able Seafarer but do not currently hold RFPNW or RFPEW may be eligible to be grandfathered in. In such situations both the Able Seafarer and RFPNW or RFPEW will be endorsed on your MMC. See Coast Guard Policy Letter 12-07 for more details.

- 4. What does the Able Seafarer-Deck and Able Seafarer-Engine endorsements allow a mariner to do?**

Able Seafarer-Deck and Able Seafarer-Engine are the STCW counterparts to the U.S. ratings of Able Seaman and QMED. These STCW endorsements are required by mariners serving as Able Seaman or QMED on vessels that are on voyages to which the STCW applies.

5. I already have RFPNW. Am I qualified for an endorsement as AS-D?

Maybe. The AS-D is considered a higher endorsement than the RFPNW, however, by itself RFPNW will not qualify you for an AS-D endorsement.

- If you do not hold an endorsement as Able Seaman, you must show at least 12 months of service as RFPNW.
- If you hold an endorsement as Able Seaman-Unlimited or Able Seaman-Limited, you can qualify for AS-D without showing sea service.
- If you hold an endorsement as Able Seaman-Special, you must show evidence of at least 6 months of service
- If you hold Able Seaman-OSV, Able Seaman-Sail or Able Seaman-Fishing industry, you must show evidence of at least 12 months of service.

See [Coast Guard Policy Letter 12-07](#) for more details.

6. **(***ADDED 07/07/14***) Proficiency in survival craft (PSC) endorsement renewals: I believe PSC NVIC 04-14 contains a typographical error. Specifically, the renewal requirements of enclosure (1), paragraph 2.c.2 appears to be in conflict with NVIC 02-14 and the new regulations. Can you please confirm what the PSC renewal requirements are?**

NVIC 04-14 provides the method through which the Coast Guard will implement the regulations. The required assessments ashore are duplicative of those that must be done ashore for the personal survival component of basic training, and do not need to be done more than once. If a mariner has one year of service in the previous five years and meets the requirements for continued competency in basic training, then they will also satisfy the requirement for continued competency for PSC or PSC-limited.

7. (ADDED 05/27/15**) Can I obtain an STCW endorsement as able seafarer-deck without holding a national endorsement as able seaman-limited?**

46 CFR 12.601(a) states that an applicant for any STCW endorsement must hold the appropriate national endorsement, unless otherwise specified. Table 1 to 46 CFR 12.603 provides eligibility of national endorsements for an STCW endorsement as able seafarer-deck. Applicants for able seafarer-deck must hold one of the national endorsements as able seaman. Additionally, you need meet one of the transitional provisions listed in [NVIC 02-14 Encl \(2\) paragraph 4](#).

8. (ADDED 05/27/15**) RFPNW-Lookout Duties Only: Enclosure (2) of Grandfathering NVIC-02-14 states in # 3: Rating Forming Part of a Navigational Watch. Beginning March 24, 2015, the Coast Guard will no longer issue the interim, non-renewable endorsement of Rating Forming Part of a Navigational Watch - Lookout Duties Only. Endorsements issued prior to this date, will remain valid until their specified expiration dates.” If a person applies prior to March 24, 2015, will they be granted the “Rating Forming Part of a Navigational Watch - Lookout Duties Only” rating for 1 year or do they expire March 24, 2015?**

As long as the mariner applies for his or her RFPNW-Lookout Duties Only endorsement before March 24, 2015, the endorsement will be good for 1 year from the date the endorsement is issued.

9. (ADDED 05/27/15**) A review of NVIC 06-14 RFPNW shows that Assessment 2.1.A, Performance Standard 1. States that “Reports the large vessel before it is within 5 miles of own ship”. Prior to NVIC 6-14, this assessment was required to done at 10 miles, much like the Assessment 2.1.B. as printed in NVIC 06-14. Is this an error in publication?**

No. The assessment was intentionally revised but, as explained in paragraph 3.d of enclosure (1) to the NVIC, mariners may continue to qualify using the previous model assessments until December 31, 2016.

STCW Frequently Asked Questions: STCW – Rating – Engine

1. Do I need to currently hold RFPEW to get an AS-E?

No.

2. Are non-watchstanding Able Seaman or QMEDs such as pumpmen, electricians, or machinists required to hold endorsements for Able Seafarer?

Yes, if they are serving on vessels engaged on voyages to which STCW applies.

3. I already have RFPEW. Am I qualified for an endorsement as AS-E?

Maybe. The AS-E is considered a higher endorsement than the RFPEW, however, by itself RFPEW will not qualify you for an AS-E endorsement.

- If you do not hold an endorsement as QMED, you must show at least 12 months of service as RFPEW.
- If you hold a QMED endorsement as Engineman or Deck Engine Mechanic, you can qualify for AS-E without showing sea service.
- If you hold any other QMED endorsement you must show evidence of at least 6 months of service.

See Coast Guard Policy Letter 12-07 for more details.

4. (**ADDED 07/07/14**) Does successful completion of a QMED FWTO training course qualify as special RFPEW pre-sea training? Does the requirement for our students to provide evidence of 90 days of engine room service if coupled with completion of STCW RFPEW competencies, satisfy the seagoing service of not less than two months? Our students receive total class room training of 30 days and must obtain documented engine room service of 90 days.

“Pre-sea” training applies only to a comprehensive training program that includes a period of onboard service and training. If the training ashore is not followed by a structured program of shipboard training, the training ashore is not considered pre-sea training. The shipboard training must be under an approval granted by the National Maritime Center and must follow the approved curriculum. For a conventional school that does not operate vessels, there would need to be a training agreement in place with a vessel operator under which the vessel operator would provide the program’s approved shipboard training. Simply “obtaining” sea service after some training ashore, does not constitute a training program if the service does not include structured training pursuant to an approved training curriculum. While this service may be creditable towards an STCW endorsement as RFPEW, the mariner would need to obtain 180 days of service.