

# Coast Guard rescinds OICNW training requirements for vessels of more than 200GRT/500GT

With a surprising and an unexpected move, the Coast Guard reset how candidates for Officer in Charge of the Navigational Watch (OICNW) can satisfy the STCW training and assessment requirements. The Coast Guard's Mariner Credentialing Program Policy Division (CG-543) announced in the Federal Register on July 1, 2011 a new Policy Letter No. 11-07. The policy letter is guidance to the National Maritime Center pertaining to applicants who are qualifying for an officer endorsement (license) through "in-service experience" rather than completing a comprehensive, Coast Guard approved program such as that offered at a maritime academy or public and private training schools and institutions.

Policy Letter No. 11-07 cancels the OICNW qualification provisions of National Maritime Center (NMC) Policy Letters 01-02 and 16-02 (Change 1 to NMC Policy Letter 01-22) that "Hawsepipe mariners" have been complying with to obtain the Mate 500/1600GRT and Third Mate Near Coastal and Oceans licenses with the STCW OICNW (Operational Level) endorsement since STCW 95 came into force nearly a decade ago.

According to Policy Letter 11-07, applicants must now complete only a hand full of training that is required by regulations in 46 CFR Part 11, as follows:

- Basic Safety Training
- Radar Observer
- Advanced Fire Fighting
- Bridge Team Work (a.k.a Bridge Resource Management)
- ARPA (to work on vessels equipped with ARPA)
- GMDSS (to work on vessels equipped with GMDSS)

The Policy Letter No. 11-07 states that applicants may satisfy the STCW knowledge-based competencies by completing a Coast Guard administered examination for the associated license endorsement and/or by completion of relevant Coast Guard approved training. Applicants will also be required to complete the 79 so-called "Control Sheets" documenting demonstrations of proficiency that for the most part were carried over from the original NMC Policy Letter 01-02.

The new policy provided no explanation for this drastic reversal, nor does it offer any consolation to mariners or to training schools. Hundreds if not thousands of mariners have made the sacrifices and paid the price to meet requirements that are no longer are in force. Many training schools have invested untold man hours as well as made substantial financial commitments to be able to offer the approved "Operational Level" OICNW course modules.

---

## Quality Maritime Training

Not unlike other Coast Guard policy letters, the new policy has several areas that are either ambiguous and/or open to interpretation. One example is the statement “*applicants may satisfy the STCW knowledge-based competencies by completing a Coast Guard administered examination for the associated license endorsement and/or by completion of relevant Coast Guard approved training.*” Does this mean if a OICNW candidate chooses to still complete all of the OICNW training modules and the assessments, that they will not be required to take and pass the Coast Guard license examinations?

There are other concerns and questions about this policy. One must remember that the Coast Guard issued deck licenses for vessels of 500 or 1600GRT are U.S. Domestic licenses. What International routes the mariner is authorized to operate a vessel on is determined by what is stated in the STCW certificate/endorsement section their Merchant Mariner Credential (MMC).

Regarding the “Hawsepipe” Mate/OICNW who chooses the short route allowed by the new policy of getting deck officers to sign off their assessments, complete the minimal required training and passes the Coast Guard administered examination. Will the Coast Guard really put the same STCW Roman Numerals in the MMC of the short route mariner as the mariner that actually completed all of the relevant OICNW training modules and was assessed for proficiency in a consistent manner? If the answer is yes, then what a slam to those mariners who qualified by actually completing all of required STCW training and assessments. If the answer is no, then that creates further questions.

Will the short route Hawsepipe Mate/OICNW ultimately find that under this policy, the Coast Guard will in reality put a “domestic waters/voyages” restriction on their STCW OICNW endorsement? If the answer is yes, then the Coast Guard will have done many mariners a great disservice by instituting this new policy. If the answer is no, then once other Flag and Port Administrations understand how the Coast Guard has striped down our STCW qualification requirements, how will they generally view the STCW endorsements of the U.S. credentialed mariner in their waters and ports?

There’s another potential ticking bomb in all of this. It is possible that the OICNW training requirements will be reinstated when the Coast Guard finalizes the rules that were published in 1997 to implement the provisions of STCW 95. Revisions to these “interim” rules, which have been in force since 2002, were proposed in 2010 but were withdrawn for redrafting after generating substantial negative public comment. A revised version of the proposal is expected to appear yet this summer.

Adding to the uncertainty is the unknown impact of the 2010 “Manila” Amendments” to STCW that become effective on January 1, 2012. The additional requirements and changes to existing STCW provisions in those Amendments will likely be addressed in the Coast Guard’s proposed revisions to U.S. Regulations.

---

### Quality Maritime Training

Until the NMC publishes its intentions, mariners, training schools, and vessel companies can only wonder what will be required of them. To date, the NMC has reacted to CG-543 Policy Letter 11-07, by posting a Marine Safety Information Bulletin (MSIB) on their web site along with new Mate 500/1600GRT Upon Near Coastal and Oceans Waters check lists.

For now, at least, the door appears to be open for Mate/OICNW candidates to take advantage of the drastically reduced STCW requirements. However to the Mate/OICNW candidate, I would remind them of the old saying, “what appears to be to good to be true, probably is.”

---

### Quality Maritime Training