



**16721  
NMC-4 Policy Letter 24-98**

**DEC 18 1998**

**From: Commanding Officer  
To: Distribution**

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

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

5. The United States considers the Great Lakes to be inland waters not subject to the STCW; however, the Canadian government will issue STCW forms to its mariners serving on Great Lakes vessels. It is our understanding that the Canadian government will not require mariners serving on U. S.-flagged vessels operating exclusively on the Great Lakes to hold an STCW form. If Canada begins to require STCW forms for these mariners, we will issue STCW forms valid for service limited to the Great Lakes only.

/s/

**W. C. BENNETT**

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

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

**APPLICATION OF THE STCW TO LICENSED ENGINEERS  
WHO DO NOT MEET THE STCW'S REQUIREMENTS**

IF AN APPLICANT HAS	AND APPLIES FOR	THEN THE APPLICANT	SHOULD BE ISSUED*
Service or training before 1 August 1998	original license	qualifies for an STCW-78 form**	STCW-78 form and the oceans (or near coastal for service on ocean or listed in 46 CFR 10.202(endorsement, and on vessels of any gross tons."
Service or training before 1 August 1998	upgrade of a license based on that service	qualifies for an STCW-78 form**	Same as above
Service or training before 1 August 1998	renewal of a license	qualifies for an STCW-78 form**	Same as above
No service or training before 1 August 1998	original license	does not qualify for any STCW form ***	a license endorsed "Valid waters only on vessels without further endorsement, and inland waters upon
No service or training before 1 August 1998 applicable to the upgrade, but has a license based on service before that date	upgrade of a license based on service occurring after 31 July 1998	does not qualify for an STCW form at the upgraded level. If the applicant was eligible for an STCW-78 form at the level before the upgrade, the applicant qualifies for continuation of that STCW qualification until 1 February 2002. *** (An upgrade from 3AE to 2AE is not considered a change in level by the STCW. Treat this transaction as an upgrade based on service before 1 August 1998.)	STCW-78 form valid at granted and the license) level, valid waters only on vessels without further endorsement, and inland waters upon ___(original license)___ near coastal waters) and service only on ocean in 46 CFR 10.202(k) and for service on Great Lakes any gross tons."
No service or training before 1 August 1998	upgrade of a license	does not qualify for an STCW form	a license endorsed "Valid waters only on small seagoing 10.202(k) and (l) without Lakes and inland waters

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

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

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

**APPLICATION OF THE STCW TO QUALIFIED ENGINEERING RATINGS  
WHO DO NOT MEET THE STCW'S REQUIREMENTS**

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

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

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

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