

**Supporting Statement
for
Standards of Training, Certification and Watchkeeping for Seafarers (STCW),
1995 and 1997 Amendments to the International Convention**

A. Justification

1) Circumstances that make the collection necessary.

The collection of information is needed to ensure that mariners have completed training and assessment necessary to receive STCW certification or endorsement. Collection of information is also needed to demonstrate to the International Maritime Organization that the United States has in place certain specific regulations that implement the international requirements. The requirements generally reflect routine practices for U.S. ship operating companies and training institutions.

On July 7, 1995, a Conference of Parties to the International Convention for Standards of Training, Certification and Watchkeeping for Seafarers, 1978 (STCW) Convention, meeting at the International Maritime Organization (IMO) in London, adopted a package of amendments to the STCW Convention. The International Convention on Standards of Training, Certification, and Watchkeeping sets qualifications for masters, officers and watchkeeping personnel on seagoing merchant ships. The amendments adopted by the Conference in July 1995 were comprehensive and detailed.

Regulation V/3 of STCW, as amended in 1997, mandated that its Parties ensure the training and certification for mariners serving on ships -- other than roll-on/roll-off (Ro-Ro) ships -- carrying more than 12 passengers on international voyages. They define standards of competence necessary to protect safety of life at sea and the marine environment and address the responsibilities of all State-Parties to ensure seafarers meet defined standards of competence and quality.

The 1995 and 1997 amendments also require communication of information to IMO to allow for mutual oversight of seafarers and vessel owners and operators and in order to ensure that State-Parties enforce the standards of competency and quality outlined in the Convention. The information collection requirements described in this supporting statement are necessary to implement the amendments to this important international treaty in 46 CFR sections 10.304, 10.309, 10.1105, 12.02-17, 12.03-1, 12.35-5, 15.1103, 15.1107 and 15.1111 [[CFR cites are found at -- http://www.access.gpo.gov/nara/cfr/waisidx_07/46cfrv1_07.html](http://www.access.gpo.gov/nara/cfr/waisidx_07/46cfrv1_07.html)].

STCW requires seafarers serving on vessels affected by STCW to either take training, or demonstrate competency, in skills necessary to perform assigned duties. The regulation contains collection of information requirements for the following: documentation of curriculum for training courses used to receive STCW certification or endorsement; documentation of practical skills demonstration; documentation of training and assessment; documentation of medical fitness; maintenance of seafarers' records by vessel owners or operators; and, documentary

evidence showing that the personnel serving on passenger ships (other than Ro-Ro's) on international voyages meet appropriate training.

There are no forms associated with this COI. Individuals/companies can develop whatever works for them as long as the info content follows the rules. The CG has published guidance on STCW requirements. Info can be found at -- <http://www.uscg.mil/STCW/stcw-help.htm> . There is no requirement to share or upload info electronically.

The table below identifies which part of the CFR corresponds to the subject.

Table 1
STCW 1995 and 1997 Amendments: CFR, Subject and Affected Population

46 CFR	Subject and Affected Population
10.304	<p>a) Recording of training and assessment record books.</p> <ul style="list-style-type: none"> • Candidates for an STCW certificate or endorsement as an officer in charge of an engineering watch applying to substitute approved training in place of required service. • Candidates for an STCW certificate or endorsement as an officer in charge of an engineering watch, for service in a seagoing vessel.
10.309, and 12.03-1	<p>b) Documentation of training courses and student's performance. c) Documentation and submission of skills demonstration to the National Maritime Center (NMC).</p> <ul style="list-style-type: none"> • Training and assessment providers.
10.1105, 12.35-5 and 15.1103	<p>d) Documentary evidence showing that the personnel serving on passenger ships (other than Ro-Ro's) on international voyages meet appropriate training</p> <ul style="list-style-type: none"> • All personnel serving on passenger ships (other than Ro-Ro's)
12.02-17	<p>e) Documentation of medical fitness.</p> <ul style="list-style-type: none"> • All applicants for merchant mariner's document.
15.1107	<p>f) Maintenance of merchant mariners' records by owner or operator.</p> <ul style="list-style-type: none"> • Seagoing vessels subject to the STCW.
15.1111	<p>g) Posting of watch schedules.</p> <ul style="list-style-type: none"> • Seagoing vessels subject to the STCW.

a) Recording of training and assessment record books. Candidates for an STCW certificate or endorsement as an officer in charge of a navigational watch or engineering watch may use a combination of training and sea service to meet STCW requirements. When seagoing service is combined with training in order to qualify for STCW certification, training must be documented in a Coast Guard-accepted-training-record book. Documentation of sea-service will ensure that seafarers that opt to use sea-service as the basis for their qualifications have the experience that will allow them to meet the standards of competency outlined in STCW.

b) Documentation of training courses and student's performance. Where courses are required, objectives and criteria used for training not subject to Coast Guard approval must be documented and available for evaluation. Documentation of course objectives and training

criteria will ensure that training and assessment activities prepare seafarers to meet the standards of competency outlined in STCW.

c) Documentation and submission of skills demonstration to the NMC. Under STCW, when courses are not required, candidates for original licenses and license renewals must demonstrate competency in skills necessary to perform assigned duties. Evidence of demonstrated competency must be documented and submitted to the NMC in order for candidates to receive STCW certification or documentation.

d) Documentary evidence showing that the personnel serving on passenger ships (other than Ro-Ro's) on international voyages meet appropriate training.

STCW Regulation V/3 requires that each mariner who completes the required training receive a certificate. Every five years, completion of a refresher course would be documented in the mariner's record and it would show that the mariner has received such training, or has otherwise maintained competence in the required areas of knowledge, understanding and proficiency.

e) Documentation of medical fitness. Applicants for merchant mariners' documents must submit written reports from medical practitioners stating that they are medically fit to perform assigned duties. Documentation of medical fitness will ensure that seafarers are fit to perform assigned duties.

f) Maintenance of merchant mariners' records by owner or operator. Ship companies must ensure that information regarding the medical fitness, experience, and competency of seafarers serving on any vessel is maintained and accessible to management. Seafarers' records maintained by the owners/operators would be subject to Coast Guard review in its oversight function to ensure that seafarers employed on vessels affected by STCW have the skills and fitness level necessary to perform assigned duties.

g) Posting of watch schedules. Rest hour minima will require posting of rest hour schedules for each vessel. These recordkeeping requirements are largely consistent with good commercial practices and dictate good seamanship for safe navigation.

Strategic Goals

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Marine Safety
- Protection of the Natural Resources

Marine Safety, Security and Stewardship Directorate (CG-5)

- Reduce crewmember deaths and injuries on U.S. commercial vessels
- Reduce the risk of major loss of life on passenger vessels
- Reduce the discharge of oil into the marine environment
- Reduce the discharge of chemicals into the environment

2) Purpose of the information collection.

The purpose of the information collection is to ensure compliance with international requirements and to maintain acceptable quality in activities associated with training and assessment of merchant mariners. Documentation of objectives and criteria used for training and assessment would ensure that training programs meet the objectives required by the IMO. Documentation of skill demonstration and sea-service would ensure that seafarers have the skills and experience necessary to perform assigned duties. Ship company record maintenance and rest hour posting requirements would make companies responsible for verifying the credentials of seafarers employed in their service.

3) Considerations of the use of improved information technology to reduce the burden.

The information collection may be in written or electronic form. There are no forms, structured format or system required for maintaining the information.

We estimate that about 27% of the reporting and recordkeeping requirements can be done electronically. At this time, we estimate that approximately 6% of the total number of responses are collected electronically. See Table 2 below for a more comprehensive breakdown of the collections of information that can be collected electronically.

The language in 46 CFR 12.02-17 requiring documentation of medical fitness (section e in Table 2), is at present focused on written reports, as it requires signature or thumb print of the mariner in question. Thus for now, we assume these cannot be collected electronically. Additionally, posting of watch schedules (section g in Table 2) also cannot be done electronically, for obvious reasons.

Table 2
Electronic Submissions

Requirement	Responses	Responses That Can Be Collected Electronically	Electronically Collected Responses
a. Recording of training and assessment record books.	106	106	11
b. Documentation of training courses and student's performance.	1,122	1,122	224
c. Documentation and submission of skills demonstration to the NMC.	165	165	33
d. Documentary evidence showing that the personnel serving on passenger ships (other than Ro-Ro's) on international voyages meet appropriate training.	562	562	562
e. Documentation of medical fitness.	12,325	N/A	N/A
f. Maintenance of merchant mariners' records by owner or operator.	4,080	4,080	408
g. Posting of watch schedules.	4,080	N/A	N/A
Total Annual Respondents and Burden (Hours)	22,440	6,035	1,238

4) Efforts to identify duplication. Why similar information available cannot be used.

There are no State or local regulations relating to this issue. No similar information collection is conducted by other Federal agencies. Similar information does not exist.

5) Methods used to minimize the burden to small businesses if involved.

Small passenger vessels, uninspected passenger vessels, fish tenders and vessels less than 200 gross tons are sectors of the maritime industry in which small businesses are disproportionately represented.

Since domestic law has generally excluded uninspected passenger vessels from regulations applicable to ocean-going vessels, the Coast Guard exempts personnel serving on uninspected passenger vessels from STCW requirements. Existing domestic regulations for small passenger vessels and for seagoing vessels less than 200 Gross Register Tons are considered equivalent to STCW standards. Fish tenders are exempt from application of STCW under Section 1147 of the Coast Guard Authorization Act of 1996 (Pub. L. 104-324). [Pub. L. 104-324 found at --http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=104_cong_public_laws&docid=f:publ324.104.pdf]

Some maritime training institutions are classified as small entities. STCW does not require seafarers to receive training and assessment from a single institution. Thus these smaller training institutions could, at their own discretion, offer some or all of the courses required for STCW 1995 and 1997 certification. Likewise, seafarers enjoy considerable flexibility in deciding how to meet STCW 1995 and 1997 training and assessment requirements.

6) Consequences to the Federal program if collection were not conducted or conducted less frequently.

Failure to effect the required collection of information relating to skills and experience could render unverifiable compliance with STCW training and assessment requirements.

Without an information collection, there would be no practical means for holding the owner or operator of a seagoing vessel accountable for inadequate navigational safety practices. Also, there would be no way to determine whether seafarers employed on vessels covered under STCW had successfully completed training or demonstrated competency in skills necessary to perform assigned duties.

7) Special circumstances that require collection to be conducted in an inconsistent manner.

This information collection is conducted in manner consistent with the guidelines in 5CFR 1320.5(d)(2).

8) Consultation.

A 60 day Notice was published in the Federal Register to obtain public comment on this collection (See [USCG-2008-1036], October 27, 2008, 73 FR 63720). The USCG has not received any comments on this information collection

9) Provide any payment or gift to respondents.

There is no offer of monetary or material value for this information collection.

10) Assurances of confidentiality provided to respondents.

There are no assurances of confidentiality provided to the respondents for this information collection.

11) Additional justification for any questions of a sensitive nature.

There are no questions of sensitive nature.

12) Estimate of Annual Hour and Cost Burden.

The reporting burden includes the recordkeeping burden for training and assessment record books, monitor approved training, document skills demonstration, documentary evidence showing that the personnel serving on passenger ships (other than Ro-Ro's) on international voyages meet appropriate training maintenance of seaman records, and posting of rest hour minimums.

Annual Hour Burden (Respondents):

The total **annual recordkeeping burden is 17,927 hours for 22,440 respondents.** Table 3 below indicates the hour burden associated with the requirements in this collection of information.

Table 3
Annual Hour Burden of Collection of Information

Requirement	Respondents	Responses	Burden (Hours)
a. Recording of training and assessment record books.	106	106	106
b. Documentation of training courses and student's performance.	165	1,122	1,287
c. Documentation and submission of skills demonstration to the NMC.	165	165	53
d. Documentary evidence showing that the personnel serving on passenger ships (other than Ro-Ro's) on international voyages meet appropriate training. ¹	562	562	47
e. Documentation of medical fitness.	12,325	12,325	3,081
f. Maintenance of merchant mariners' records by owner or operator.	1,360	4,080	12,333
g. Posting of watch schedules.	1,360	4,080	1,020
Total Annual Respondents and Burden (Hours)	14,518	22,440	17,927

a) Recording of Training and Assessment Record Books

Approximately 106 mariners annually would use training to substitute for required sea service when applying for an STCW certificate or endorsement. It is estimated to take 1.0 hour for assessors to document training in a Coast Guard-accepted training-record book. Records inspection burden: 1.0 hour (management time) x 106 mariners = 106 hours.

b) Document Training Courses

Approximately 165 training institutions, manage 1,122 courses that have been approved by the Coast Guard. We estimate that it takes 1 hour of training institution management time per course

¹ The burden that was determined in the Collection of Information section of the Notice of Proposed Rulemaking for 46 CFR 15.1103 would double count the burden determined for 46 CFR 10.1105 and 12.35-5. Therefore, the burden imposed by requiring documentary evidence proving that mariners meet the appropriate training standards was counted only *once*, as presented in paragraph d.

to provide the Coast Guard with the required updates on their approved Coast Guard training. Records inspection burden: 1.0 hour (management time) x 1,122 courses = 1,122 hours.

In addition, these 165 training institutions submit updated training paperwork to the Coast Guard, in order to meet the 1997 Amendments of STCW. We estimate that each training institution would take one hour to provide the Coast Guard with updated paperwork on training approved or accepted by the Coast Guard. Consequently, the burden for the affected training institutions is: 1.0 hour (management time) x 165 = 165 hours.

The documentation of training courses burden is: 1,122 hours + 165 hours = 1,287 hours.

c) Documentation of Skills Demonstration

The documentation is kept by the 165 training institutions. However, the burden is tied to the number of trainees these institutions serve. Therefore the estimate is based on a per trainee basis. The Coast Guard estimates that 106 mariners will have demonstrated skills through training and will need documentation annually. Assessors would perform an estimated 0.5 hour of management time to comply with providing the Coast Guard documentation of demonstrated skills. Records inspection burdens: 0.5 hours (management time) x 106 mariners = 53 hours.

d) Documentary evidence showing that the personnel serving on passenger ships (other than Ro-Ro's) on international voyages meet appropriate training

We estimate that it takes 5 minutes for the mariner to file the documentary evidence in an easily accessible location. There are 562 mariners each year that complete the training required by STCW Regulation V / 3. We calculate the annual burden placed on these mariners, which is: 0.083 hours x 1,046 seafarers = 47 hours.

e) Documentation of Medical Fitness

“An applicant for a merchant mariner’s document who will be serving on a seagoing vessel of 200 GRT or more,” has to show documentation of medical fitness (46 CFR 12.02-17(e)). The Coast Guard estimates it takes ¼ hour to document a statement noting that seafarers are medically fit to perform the duties assigned to an entry-level unlicensed seafarer. The Coast Guard estimates that 12,325 seafarers apply for an unlicensed entry-level position annually and would therefore require a statement certifying their fitness in order to comply with STCW.

Records inspection burden: 0.25 hours (management time) x 12,325 seafarers = 3,081 hours.

f) Maintain Seaman Records

Seafarers’ records would have to be coordinated and maintained once by vessel owners and operators during the length each seafarer works on a specific vessel. The Coast Guard estimates that 1,360 vessels would have to comply with STCW requirements, each vessel is estimated to take 3 trips per year. From that, seaman records will have to be coordinated and maintained

4,791 times per year [1,360 x 3 = 4,080 crews]. The Coast Guard estimates that each trip will be crewed by an average of 18 seafarers. It is estimated to take 10 minutes to file each seafarer's records in a place accessible to the Coast Guard, so that the Coast Guard can verify seafarer's records. From that it is estimated to take 3 hours to coordinate records for each new crew [(10/60) x 18 = 3 hours]. Records inspection burden: 3 hours (management time) x 4,080 crews = 12,240 hours.

Approximately 562 seafarer's records will be maintained in response to STCW Regulation V/3. It is estimated to take 10 minutes to file each seafarer's records in a place accessible to the Coast Guard. Consequently, the burden of this addition is: 0.166 hours x 562 mariners = 93 hours.

The burden of maintaining seaman's records is: 12,240 hours + 93 hours = 12,333 hours.

g) Posting of Rest Hour Minimums

The Coast Guard estimates it takes ¼ hour to post rest hour minima. Rest hour minima have to be posted for each new crew. The Coast Guard estimates that 1,360 vessels would have to comply with STCW requirements, each of which is estimated to take 3 trips per year. From that, there will be 4,080 crews or 4,080 rest hour postings per year [1,360 x 3 = 4,080 crews]. Records inspection burden: 0.25 hours (management time) x 4,080 crews = 1,020 hours.

Annual Cost Burden

Mariners, owners and operators of merchant marine industry, and maritime training institutions will incur costs. The Coast Guard estimates the **annual cost burden** for these information collection activities is **\$883,410** in current dollars. Table 4 below identifies the cost burden by the requirements covered in this collection of information.

Table 4
Annual Burden Cost of Collection of Information

Requirement	Current Dollars
a. Recording of training and assessment record books.	7,738
b. Documentation of training courses and student's performance.	48,906
c. Documentation and submission of skills demonstration to the NMC.	3,869
d. Documentary evidence showing that the personnel serving on passenger ships (other than Ro-Ro's) on international voyages meet appropriate training.	7,347
e. Documentation of medical fitness.	308,125
f. Maintenance of merchant mariners' records by owner or operator.	468,665
g. Posting of watch schedules.	38,760
Total Annual Burden Cost	\$883,410

a) Recording of Training and Assessment Record Books

Approximately 106 burden hours would be required annually to provide the Coast Guard records that illustrate updates of seafarers' training and assessment record books. A qualified assessor must record the training and assessment. The Coast Guard estimates that a qualified assessor would earn an effective hourly wage (including all benefits) equal to that of an out-of-government GS-13. The 9 April 2008 COMDTINST 7310.1L indicates that the assumed hourly out-of-government wage rate for a GS-13 equivalent is \$73. The total annual cost to the industry is \$7,738 (106 x \$73).

b) Document Training Courses

Approximately 1,287 burden hours would be required by maritime training institutions to provide the Coast Guard records that illustrate curriculum of training courses offered for STCW certification or endorsement. The Coast Guard estimates that a qualified clerk could perform this work, requiring the services of an out-of-government equivalent of a GS-07. The 9 April 2008 COMDTINST 7310.1L indicates that the assumed hourly out-of-government wage rate for a GS-07 is \$38 (including all benefits). The total cost to the industry is \$48,906 (1,287 x \$38).

c) Documentation of Skills Demonstration

Approximately 53 burden hours would be required annually to provide the Coast Guard records illustrating the skill areas in which seafarers have demonstrated competency. Skills must be demonstrated in the presence of a qualified assessor. The Coast Guard estimates that a qualified assessor would earn effective hourly wages (including all benefits) equivalent to that of an out-of-government GS-13. The 9 April 2008 COMDTINST 7310.1L indicates that the assumed hourly out-of-government wage rate for a GS-13 is \$73. The total annual cost to the industry is \$3,869 (53 x \$73).

d) Documentary evidence showing that the personnel serving on passenger ships (other than Ro-Ro's) on international voyages meet appropriate training

The estimated burden that the mariner bears to display the certification has been estimated above at 47 hours. The wage of the mariners that complete the training required by STCW Regulation V / 3 is \$156 (determined as an average based on daily wage rates for licensed and unlicensed mariners in 1999, \$200 and \$117 respectively, and imposing observed 3.1% annual growth in the annual wage²). The burden to industry is: \$7,347 = 47 hours x \$156.

e) Documentation of Medical Fitness

Approximately 3,081 burden hours would be required annually to furnish records for Coast Guard inspectors demonstrating that entry-level seafarers are medically fit to perform assigned duties. A qualified medical practitioner must issue this document. The Coast Guard estimates

² This growth rate is equal to the combined Social Security Administration Trustees history and assumptions for the national average wage index for the period 1999-2005 as listed in the 2005 Report of the Social Security Trustees.

such a professional would earn hourly wages equivalent to those of an out-of-government GS-15. The 9 April 2008 COMDTINST 7310.1L indicates that the assumed hourly wage (including all benefits) for an out-of-government GS-15 is \$100. The total annual cost to the industry is \$308,125 (3,081 x \$100).

f) Maintain Seaman Records

The Coast Guard estimates that 12,333 burden hours would be required annually of owners and operators in order to provide the Coast Guard records that verify seafarers' qualifications and credentials. The Coast Guard assumes that a qualified clerk, earning at the equivalent of an out-of-government GS-07 level, could furnish such documentation. The 9 April 2008 COMDTINST 7310.1L indicates that the assumed hourly wage of an out-of-government GS-07 (including all benefits) is \$38. The total annual cost to the industry is \$468,665 (12,333 x \$38).

g) Posting of Rest Hour Schedules

The Coast Guard estimates that 1,020 burden hours would be required annually of owners and operators in order to post rest hour schedules through notices verified by the Coast Guard during annual inspections. Rest hour schedules are posted once for each crew. A qualified clerk, working at the GS-07 level, could perform this duty. The 9 April 2008 COMDTINST 7310.1L indicates that an out of government GS-07 should be assumed to earning at an hourly rate of \$38 (inclusive of all benefits). The total annual cost to the industry is \$38,760 (1,020 x \$38).

13) Estimate of annualized capital and start-up costs.

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

14) Estimates of annualized cost to the Federal Government.

Government costs will come from examining and reporting of training record information. These costs come from reporting of training record inspections of mariners for medical fitness, experience, training and competency. LTJGs are expected to spend 30 minutes (0.5 hours) in checking/updating training records per mariner. The average annual hour burden would be 6,163 hours per year (12,325 mariners X 0.5 hour/response). The 9 April 2008 COMDTINST 7310.1L indicates that the assumed hourly wage of a LTJG (including all benefits) is equal to \$54. The average annual cost burden to the Federal Government would be \$332,802 (6,163 hours X \$54/hour).

15) Reasons for change in the burden.

The change in the burden is an ADJUSTMENT. The change is primarily due to 2 factors—(1) a change in the estimated population of mariners, and (2) a change in the number of training institutions and courses submitted by them to the Coast Guard for approval. There is no programmatic change associated with this change in burden.

16) Plans for tabulation, statistical analysis and publication.

This information collection will not be published for statistical purposes.

17) Approval for not explaining the expiration date for OMB approval.

USCG will display the expiration date for OMB approval of this information collection.

18) Exception to the certification statement.

USCG does not request an exception to the certification of this information collection..

B. Collection of Information Employing Statistical Methods

This information does not employ statistical methods.