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NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 1-95

Subj: VOLUNTARY TRAINING STANDARDS FOR ENTRY-LEVEL PERSONNEL ON TOWING INDUSTRY VESSELS

1. PURPOSE This circular recommends that the towing industry adopt voluntary measures pertaining to the training of individuals upon entry into the towing industry.
2. DIRECTIVES AFFECTED None.
3. BACKGROUND Pursuant to 46 U.S.C. 8904, as implemented by the regulations in Part 15 of Title 46 of the Code of Federal Regulations, a towing vessel that is at least 26 feet in length must be under the direction and control of an individual licensed by the Coast Guard. Pursuant to 46 U.S.C. 8702, as implemented by the regulations in Part 15 of Title 46 of the Code of Federal Regulations, a towing vessel of at least 100 GT., not operating exclusively on rivers, lakes, bays and sounds may operate only if at least 50% of the deck crew (excluding licensed individuals) have Merchant Mariners' Documents (MMD) endorsed for a rating of at least able seaman. The statutes do not require the Coast Guard to establish qualifications for entry-level personnel.
4. DISCUSSION
 - a. Although not required by statute, the Coast Guard believes that entry-level personnel on towing vessels should have minimum training prior to being assigned duties on a vessel. Every crew member has a vital role in controlling an emergency situation. Seafarers lacking minimal qualifications may endanger themselves, their fellow crew members, and their vessel.
 - b. Towing vessels are defined in 46 U.S.C. 2101 as "...commercial vessel engaged in or intending to engage in the service of pulling, pushing, or hauling alongside, or any combination of pulling, pushing or hauling alongside." Towing vessels do not include vessels used exclusively in towing assistance. Entry-level crew members are all members of the crew not required to be licensed or to hold an MMD endorsed as able seaman or qualified member of the engine department.
 - c. The Coast Guard requested the Towing Safety Advisory Committee (TSAC) at its April 1993 meeting to advise the Coast Guard if entry-level personnel on towing vessels should meet prescribed training standards and, if so, what standards should apply. A TSAC working group developed the basic guidelines for companies to follow and recommended that compliance should

The following training should be provided for all members of the crew employed in entry level positions:

- (1) Company orientation, rules and procedures:
 - (a) Vessel orientation, equipment and vessel terminology, and protocol aboard vessels;
 - (b) Introduction to first aid and CPR;
 - (c) Orientation to pollution prevention and applicable laws;
 - (d) Substance abuse regulations and policies; and
 - (e) Hearing protection regulations and policies.
- (2) General safety policies and procedures:
 - (a) Company safety policy;
 - (b) Workplace hazards including hazards of chemicals used as vessel's stores or being carried as cargo on a barge in tow;
 - (c) Vessel safety rules;
 - (d) Emergency station bill responsibilities;
 - (e) Vessel emergency procedures;
 - (i) Man overboard procedures,
 - (ii) Firefighting procedures and drilling,
 - (iii) Abandon ship procedures.
 - (f) Personal flotation device location and use;
 - (g) Fire safety and prevention;
 - (h) Personal protective equipment and apparel; and
 - (i) Confined space entry hazards.
- (3) Vessel equipment use and operation:

(d) Running light/mooring light placement; and

(e) Use of hand signals.

- b. Training may be conducted either shoreside or afloat. The Coast Guard believes that one to two days of orientation training should be conducted before an individual is assigned to a position aboard a towing vessel. Training should be on a level appropriate for newly-hired, entry-level personnel. The Coast Guard recognizes that the entry-level training process does not end when an individual is first assigned to a position aboard a vessel. On-the-job training or apprentice programs are a useful means of continuing an individual's training once he or she is employed on a vessel.

6. IMPLEMENTATION

- a. The Coast Guard strongly recommends that newly-hired, entry-level personnel for towing vessels receive the basic training discussed above before they are assigned underway tasks unless under the supervision of an experienced crew member. The Coast Guard recognizes that the needs and emphasis of entry-level training will vary depending on a vessel's trade, 'area of operation, etc. These guidelines are not intended to limit the flexibility of vessel owners and operators to develop the training program most appropriate to the company's operational needs.

- b. Entry-level personnel receiving this basic training should be issued a qualification letter from their employer stating that they completed such training. A record of the shoreside and underway training the individual received should be maintained by the employer.



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