1. **PURPOSE.** This Circular provides information and policy on standards for acceptance of Fishing Vessel Safety Instructors and course curricula for training Fishing Vessel Drill Conductors in the proper procedures for conducting drills and providing instruction on federally documented commercial fishing industry vessels. The requirement for Fishing Vessel Drill Conductors to be trained was published in the Federal Register on August 14, 1991 (page 40364), as Part 28 of Title 46 Code of Federal Regulations (CFR), and is intended to help improve the overall safety record of the commercial fishing industry.

2. **DEFINITION.**
   a. **Fishing Vessel Drill Conductor** - Is an individual that meets the training requirement of 46 CFR 28.270(c) for conducting drills and providing instruction once a month to each individual on board documented commercial fishing industry vessels that operate beyond the Boundary Line.
   b. **Fishing Vessel Safety Instructor** - Is an individual that has been accepted by the local Officer-In-Charge, Marine Inspection (OCMI) to train individuals (Fishing Vessel Drill Conductors) to conduct drills and provide instruction on federally documented commercial fishing industry vessels that operate beyond the Boundary Line.

3. **DISCUSSION.**
   a. After September 1, 1994, individuals conducting drills required by 46 CFR 28.270 (Fishing Vessel Drill Conductors) must be trained in the proper procedures for conducting these activities or be an individual licensed for operation of inspected vessels of 100 gross tons or more.
   b. To be assured of meeting Coast Guard minimum training requirements of 46 CFR 28.270(c), Fishing Vessel Drill Conductors, who are not licensed for operation of inspected vessels of 100 gross tons or more, must be trained by a Fishing Vessel Safety Instructor that has been accepted by the local OCMI.
   c. The Coast Guard published a supplemental notice of proposed rule making (SNPRM) in the October 27, 1992, Federal Register (57 FR 48670). This SNPRM detailed proposed requirements for acceptance criteria for Fishing Vessel Safety Instructors and course curricula for training required by Part 28.270.
d. In the absence of significant differences between this NVIC and the final rule, the Coast Guard intends that the curricula need not be revised to meet the final rule for Part 28.275.

e. The training requirement for Fishing Vessel Drill Conductors is considered to be a onetime indoctrination course, and is not intended to have an expiration date.

f. The OCMI's acceptance of the Fishing Vessel Safety Instructor's credentials and curriculum must be renewed every five years.

4. IMPLEMENTATION.

a. Enclosure (1) details the guidelines for Fishing Vessel Safety Instructors to obtain U.S. Coast Guard acceptance to train Fishing Vessel Drill Conductors to conduct the drills required by 46 CFR 28.270(a). Those Fishing Vessel Safety Instructors meeting the guidelines and receiving the appropriate certification are authorized state that their courses are accepted by the U.S. Coast Guard and meet the established standards for training Fishing Vessel Drill Conductors.

b. Officer-In-Charge, Marine Inspections are urged to utilize local safety newsletters, fishing publications and local expositions to give these guidelines the widest possible dissemination.

R. C. NORTH
CAPTAIN, U.S. COAST GUARD
ACTING CHIEF, OFFICE OF MARINE SAFETY,
SECURITY AND ENVIRONMENTAL PROTECTION
GUIDELINES FOR ACCEPTANCE OF FISHING VESSEL SAFETY INSTRUCTORS
PROVIDING THE TRAINING REQUIRED IN 46 CFR 28.270(c)
AND
CURRICULUM OUTLINED IN 46 CFR 28.270(a)

The acceptance of Fishing Vessel Safety Instructors and curricula is intended to be administratively efficient and flexible, but also effective by ensuring that the Coast Guard accepted instructors meet a minimum standard of qualification and that curricula are evaluated using a standardized content for consistency purposes. On-site inspection of training sites are not required, but appropriate facilities and training aids must be suitable to the needs of the course and the students.

A Fishing Vessel Safety Instructor desiring to provide training may apply for Coast Guard acceptance by submitting a written request to the Officer-In-Charge, Marine Inspection (OCMI) in whose zone the training will take place, and by providing sufficient documentation establishing to the satisfaction of the OCMI that he/she meets the criteria set forth below. The Coast Guard District Fishing Vessel Safety Coordinators should be consulted or utilized to assist in this determination.

The OCMI or his representative may at any time:

1. Inspect the facilities, equipment, training site, and records;
2. Interview and survey students to aid in course evaluation; and,
3. Assign personnel to observe or participate in the course and practical demonstrations, with or without prior notification.

The Coast Guard, through the OCMI, will issue letters to Fishing Vessel Safety Instructors who have demonstrated that they meet the attached standards. Each OCMI will maintain a list of accepted Fishing Vessel Safety Instructors in their zone and make a copy available to the public upon request. Letters will be valid for a period of five years from the date of issue unless surrendered or revoked, or until superseded by regulations. A sample acceptance letter is attached.

When acceptance is desired in more than one location, the request shall so state. An OCMI reviewing requests for acceptance in multiple zones shall contact the respective OCMI(s) so that all comments can be addressed concurrently. Provided all of their respective comments have been resolved satisfactorily additional review should not be necessary and acceptance should be extended by letter from the respective OCMI. Copies of letters of acceptance to Fishing Vessel Safety Instructors will be provided to all OCMI(s) consulted during the review. The district Fishing Vessel Safety Coordinator(s) should be used to facilitate the acceptance process in multiple zones.

Fishing Vessel Safety Instructors accepted by the OCMI will be permitted to issue certificates which confirm that Fishing Vessel Drill Conductors have received the onetime instruction required by 46 CFR 28.270(c). The certificates will be accepted nationwide. Records of certificate issuance will be maintained for a period of five years and must be produced upon request by the Coast Guard.

EXISTING TRAINING FOR INDIVIDUALS CONDUCTING DRILLS

Fishing Vessel Drill Conductors who can produce evidence of having completed a similar training course prior to this guidance but after January 1, 1990, shall be considered to have been trained for the purpose of meeting 46 CFR 28.270(c) provided that this training is, in the opinion of the OCMI, at least equivalent to that specified in these guidelines.
FISHING VESSEL SAFETY INSTRUCTOR QUALIFICATIONS

For the purpose of these guidelines, a Fishing Vessel Safety Instructor may either be an individual or an organization utilizing more than one instructor. An organization providing training must ensure that all persons responsible for conducting the training collectively have the prescribed qualifications. Those instructors in an organization accepted under a collective arrangement and limited by their field of expertise, (i.e., liferaft or firefighting professional) are authorized to conduct only the applicable portion of the curriculum that is related to their experience.

A Fishing Vessel Safety Instructor shall:

1. Possess a valid merchant mariner’s license issued by the Coast Guard authorizing service as a master of inspected vessels of 100 gross tons or more, or master of uninspected fishing industry vessels, and experience that relates directly to the contingencies listed in 46 CFR 28.270(a) including experience as an instructor, or training received in instructional methods; and, provide, to the satisfaction of the OCMI, a detailed course curriculum; or,

2. Have at least one (1) year of experience in a marine related field, determined by the OCMI to meet the intent of these guidelines, and have received within the last five (5) years, specialized professional training or experience that relates directly to the contingencies listed in 46 CFR 28.270(a) including experience as an instructor, or training received in instructional methods; and, provide, to the satisfaction of the OCMI, a detailed course curriculum.

COURSE CURRICULUM GUIDELINES FOR TRAINING FISHING VESSEL DRILL INSTRUCTORS

Fishing Vessel Safety Instructors must have a detailed course summary outlining a curriculum which provides instruction in the contingencies of 46 CFR 28.270(a) and the methods of instruction to be utilized. The curriculum must include performance objectives required to measure the knowledge or skill the student is expected to possess when a course component is completed. Attached is a sample skills checklist that lists the minimum performance objectives for conducting drills and performing instruction. Performance objectives can be completed through hands-on-training, supplemented by videos and lectures. An adequate student teacher ratio of about 15 to 1 should be maintained to allow for personal attention and instruction during hands-on-training. Sufficient numbers of training aids should be maintained and utilized to properly train the students.

To adequately cover all of the required subject material and to achieve the required skill level to conduct drills on fishing vessels the course curriculum must contain a minimum of eight hours of instruction.

The following is a list of subjects which are to be covered in the course for training Fishing Vessel Drill Conductors in the proper procedures for conducting drills and performing instruction as required by 46 CFR 28.270(c).

I. Drills and Instructions

A. Abandoning the vessel

1. personnel and equipment; preparation and communication
2. Releasing and launching survival craft
3. Boarding survival craft from vessel and water

B. Fighting a fire in different locations on board the vessel
   1. Causes and prevention
   2. Equipment use and maintenance
   3. Techniques

C. Recovering an individual from the water
   1. Preparation and communication
   2. Person overboard methods/procedures/equipment
   3. Recovery procedures
   4. Precautions during and after retrieval

D. Minimizing the effects of unintentional flooding
   1. Preserving watertight integrity/knowledge and maintenance of watertight boundaries
   2. Damage control/emergency repair
   3. Dewatering equipment and techniques

E. Launching survival craft and recovering lifeboats and rescue boats
   1. Survival craft deployment and boarding techniques
   2. Survival and rescue procedures
   3. Deployment and retrieval of rescue craft

F. Donning immersion suits and personal flotation devices
   1. Quick, safe donning
   2. Entering the water/boarding the raft
   3. Function and precautions
   4. Stowage and maintenance

G. Donning a fireman's outfit and a self-contained breathing apparatus (if vessel is so equipped)
1. Quick, safe donning
2. Function and precautions
3. Stowage and maintenance

H. Making a voice radio distress call and using visual distress signals
1. Types and uses of radio communications equipment
2. EPIRBs
3. Types and uses of visual distress signals
4. Stowage and maintenance

I. Activating the general alarm
1. Importance of general alarm
2. Specific alarm signals
3. Muster stations

J. Reporting inoperable alarms
1. Testing and maintenance
2. Reporting responsibilities and procedures
3. Determining problems and solutions

II. How to Conduct a Drill
A. Realism/safe
B. Hands-on
C. Training in proper use of equipment
D. Working together; Accountability of a crew
E. Frequency of required drills
F. Evaluation/discussion

III. Vessel Safety Orientation/Emergency instructions (46 CFR 28.265 detail subjects to be covered)
SKILLS CHECKLIST

______ Don an immersion suit

______ Demonstrate proper use of EPIRBs, including arming, testing and battery replacement

______ Demonstrate proper entry of a survival craft (buoyancy apparatus/liferaft) wearing a PFD or immersion suit

______ Demonstrate proper water entry with a PFD or immersion suit

______ Demonstrate how to right a capsized liferaft

______ Demonstrate inspection, maintenance and pack immersion suit

______ Demonstrate inspection, maintenance and stowage of PFD

______ Demonstrate HELP and Huddle positions

______ Demonstrate hydrostatic releases and how they operate

______ Demonstrate proper radio techniques for MAYDAY and request for assistance

______ Demonstrate use of required visual distress signals ______ Operate a portable fire extinguisher

______ Demonstrate or explain the operation of a dewatering pump

______ Design a station bill

______ Recognize ship's signals
INDIVIDUAL

Dear:

This is in response to your letter of _____________, 199_, requesting acceptance for you and your curriculum for training individuals to conduct drills and provide instruction for crews of fishing vessels.

Your credentials and course curriculum have been evaluated and are accepted as meeting the Coast Guard standards for fishermen training requirements set forth in Title 46, Code of Federal Regulations, Part 28.270(a) and (c). This acceptance becomes effective on _________, 199_, and expires on (5 years)__ 199_. At any time during this acceptance period, proposed curricula or instructor changes must be submitted to this office for review.

As an accepted instructor:

a. You will be authorized to state that your course meets Coast Guard standards;
b. You will be permitted to issue certificates which confirm that the individuals who have passed your course have received the instruction required by 46 CFR 28.270(c); and,
c. Your name will be added to the current list of instructors and organizations that are currently authorized to conduct required training. This listing is available to the public upon request.

The Coast Guard appreciates the efforts you have taken in the field of safety training for fishermen.

Sincerely,

OCMI

Copy: Comdt (G-MVP-3)
CCGD__ Fishing Vessel Safety Coordinator
Dear:

This is in response to your letter of _____________, 199 requesting acceptance of your organization and curriculum for training individuals to conduct drills and provide instruction for crews of fishing vessels.

The course curriculum and instructors' credentials have been evaluated and are accepted as meeting the Coast Guard standards for fishermen training requirements set forth in Title 46, Code of Federal Regulations, Part 28.270(a) and (c). This acceptance becomes effective on _________, 199_, and expires on __(5 years)__ , 199_. At any time during this acceptance period, proposed curricula or instructor changes must be submitted to this office for review.

As an accepted organization:

a. You will be authorized to state that your course meets Coast Guard standards;

b. You will be permitted to issue certificates which confirm that the individuals completing your course have received the instruction required by 46 CFR 28.270(c); and,

c. Your organization will be added to the current list of instructors and organizations that are currently authorized to conduct required training. This listing is available to the public upon request.

The Coast Guard appreciates the efforts you have taken in the field of safety training for fishermen.

Sincerely,

OCMI

Copy: Comdt (G-MVP-3)  
CCGD__ Fishing Vessel Safety Coordinator