

Gulf Coast Mariners Association



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U.S. Department
of Transportation

United States
Coast Guard



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Gulf Coast Mariners Association
Attn: Mr. Dave Eckstein
P.O. Box 3589
Houma, LA 70360-3589

Dear Mr. Ekstein:

This responds to your letters of July 1 and September 14, 1999 on behalf of the Gulf Coast Mariners Association concerning the applicability of the Standards of Training, Certification and Watchkeeping for Seafarers (STCW) to the Gulf of Mexico. Your letter expressed concern as to the line beyond which STCW regulations apply.

STCW applies to seagoing vessels operating beyond the "Boundary Line" in the Gulf of Mexico. See 46 C.F.R. § 15.1101(a)(3). The Boundary Line for the Gulf of Mexico is described in 46 C.F.R. § 7.105. Generally, the Boundary Line extends from the baseline in the Gulf of Mexico seaward approximately 12 miles. This is the same line used under 46 C.F.R. § 10.103 to separate inland from ocean licenses.

If you have any questions regarding this matter, please contact Lieutenant Commander Chaney at (202) 267-0014.

Sincerely,

DAVID J. KANTOR
U.S. Coast Guard
Deputy Chief, Office of Maritime and
International Law
By direction of the Commandant

Copy: Commandant (G-MSO-1)
Commanding Officer, Coast Guard National Maritime Center
Commanding Officer, Coast Guard Marine Safety Office New Orleans

BOUNDARY LINES AND LINES OF DEMARCATION

Lines of Demarcation. The lines of demarcation separate the waters where mariners must comply with the international regulations for preventing collision at sea (COLREGS) and the inland navigation rules. The waters inside the lines are inland rules waters while those outside the lines are "COLREGS" waters where the international rules apply.

The lines of demarcation appear in Navigation Rules International-Inland (in the back of the book) and in 33 CFR Part 80. They apply only to the Rules of the Road! "Lines of demarcation" are labeled on navigation charts as such. These lines tell you which set of navigation rules you must use—either International or Inland—depending upon where you are at the time. All licensed masters, mates and operators must know which set of rules apply to the waters they operate in and must use the correct set of rules.

Boundary Lines. Boundary lines are different from the lines of demarcation. Boundary lines only apply to certain specific U.S. statutes (i.e., "laws") including:

ÉThe length of towing hawsers.

ÉThe Bridge to Bridge Radiotelephone Act.

ÉWhere certain vessels on domestic voyages are exempted from load line requirements.

ÉThe inspection of seagoing barges.

ÉThe inspection of seagoing motor vessels.

ÉThe Officers Competency Certificates Convention of 1936.

The complete definition of "boundary lines" appears in the Code of Federal Regulations at 46 CFR 7.1 and 7.5. The boundary lines along the Gulf Coast are drawn along the 12-mile line which marks the seaward limits of the "contiguous zone." In plain English, this line runs parallel to the beach and 12 miles offshore from the beach. This is true along the Gulf Coast but may be at some other place in other parts of the country.

Where does STCW apply? In April 1999, serious questions arose about where STCW would apply to mariners working in the Gulf of Mexico. GCMA received reports from its members that unidentified Coast Guard employees in the Regional Exam Center in New Orleans stated that STCW applied where the line of demarcation was drawn—essentially at all places beyond the shoreline. Other sources stated it was beyond a line either 12 or 20 miles offshore. Some boat owners believed STCW applied at a point 200 miles offshore at the boundary of the U.S. Economic Exclusion Zone (EEZ).

To end the confusion, GCMA wrote to the Chief of the Coast Guard's Office of Maritime and International Law at Headquarters on July 1, 1999. We received no reply. We wrote a second letter on September 14, 1999. When we received no answer, we appealed directly to the Commandant for a definitive answer. We finally received a letter (pre-)dated to October 1, 1999 that answered some of our questions.

The first point for mariners is that STCW regulations apply to seagoing vessels beyond the "Boundary Line" 12 nautical miles from shore. This is the figure we were looking for.

The second point for mariners is that the 12-mile "Boundary Line" in the Gulf of Mexico (only) also separates "inland" from "near-coastal" license requirements. However, if you operate within this 12-mile belt with an "inland" license, that license must have a COLREGS endorsement based on an exam that proves you know the international rules of the road (COLREGS) as well as the inland rules.