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MEMO TO STAFF

Subject: TWIC

Effective immediately, the USCG has announced a change in the TWIC program. The announcement is detailed in the Federal Register of December 22, 2011 (page 79544) and in Policy Letter 11/15.

There are two elements to the change:

1. Certain excluded mariners will not be required to present a valid TWIC during Coast Guard Inspections.
2. Certain excluded mariners “do not need to obtain a ... TWIC in order to receive an MMC, and mariners can renew an existing MMC even if their TWIC has expired.”

The Coast Guard recognized that “even after these policy changes many excluded mariners will continue to need or choose to go through the TWIC enrollment process. This is because the current MMC credentialing process required inputs from the TWIC enrollment process. The Coast Guard relies on biometric and biographic information collected as part of the TWIC enrollment process...” (emphasis added).

The list of excluded mariners is limited to those mariners who function solely in the following roles:

1. Mariners serving on uninspected passenger vessels of less than 100 GRT;
2. Mariners serving on inspected T vessels (except those on international voyages);
3. Mariners serving on towing vessels not involved in towing barges inspected under 46 CFR subchapters D, I or O;
4. Mariners serving on towing vessels involved in fleetling, docking or ship assist excepted in Title 33 CFR, Section 104.105(a)(11); and
5. Mariners who are inactive, or not operating under that authority of their credentials for long periods of time.

Bottom line:

If you are going to renew a license, and you fall into one of the excluded categories you will not need to renew your TWIC card. Save \$132.50! If you do not yet hold a TWIC, and you are going to apply for a license, you will need to apply for your TWIC card, but you DO NOT need to go back to pick it up. For everybody else it's business as usual.

M0466, 01/12