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Michael L. Breslin
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MEMORANDUM

TO: AWO Members
AWO-Recognized Third-Party Auditing Organizations

FROM: Michael L. Breslin

DATE: Aug 26, 2025

RE: Clarifying RCP Training Requirements for Vessel Crew

Please be advised that this correspondence is sent on behalf of the Responsible Carrier Program ® (RCP) Standards Board of The American Waterways Operators (AWO), which “has the authority to issue Clarifications and Directives Memoranda, as needed, to guide RCP interpretation by AWO-recognized third-party organizations.”¹

This memorandum clarifies RCP training requirements for vessel employees based on their title, position, and responsibilities as defined in a company’s Towing Safety Management System (TSMS), with a focus on RCP.II.K.3., which addresses training for an “Engineer.”

RCP.II sections A through K outline all topics that must be included in a RCP TSMS. It states: “Where applicable, each towing company must develop and document written policies and procedures... and... must abide by these policies and procedures... and must ensure that their employees are aware of, and trained in, those policies and procedures which affect their job responsibilities.”²

RCP.II.B.8 describes requirements for vessel maintenance procedures, including defining “Persons responsible for maintenance”.³ It does not assign specific tasks to specific job titles; this should be included in a company’s TSMS. **Instead, it lists required training for named positions in RCP II.K,** including:

- All Vessel Personnel
- Master, Relief Captain, Mate (Pilot)
- Engineer
- Tankerman
- Deck Crew
- Entry-Level Personnel

Training requirements for these positions “apply to any individual serving in the listed capacity aboard a towing vessel, regardless of license held”.⁴ Therefore, it is important for companies to be clear about crew member responsibilities expected to be contained within each title. This

¹ RCP Addendum F-d

² RCP II: Safety Management System

³ RCP.II.B.8.a

⁴ RCP II K: Training

memorandum will clarify the application of RCP II.K.3, which lists the applicable training for an “Engineer”.

The title “Engineer” and the training requirements assigned to it in the RCP should be applied to employees whose primary duties include diagnosing and correcting engine deficiencies or failures, and those tasks require advanced knowledge or special tools to complete.

Crew members who perform basic engine room maintenance, including the examples listed below, do so in addition to their ‘primary’ duties, such as decking or piloting the vessel. These individuals should not be considered “Engineers” according to RCP.II.K.3.

Examples of basic engine room maintenance may include (but are not limited to):

- Starting and stopping engines
- Battery maintenance
- Changing filters or fluids
- Shaft-bladder or packing maintenance
- Air-line maintenance
- Cleaning or painting
- Exhaust insulation maintenance
- Fueling
- Documenting fluid levels, hours, or maintenance dates

Companies must clearly define job responsibilities and required qualifications for each title in their TSMS to avoid misapplying RCP.II.K.3. Questions about job titles not named in the RCP should be directed to the AWO RCP Standards Board at safety@americanwaterways.com.

Respectfully Submitted,



Michael Breslin
Sr. Director Safety and Sustainability