

# **MEMBER ALERT**



Shipowners Claims Bureau, Inc., Manager  
One Battery Park Plaza 31<sup>st</sup> Fl., New York, NY 10004 USA  
Tel: +1 212 847 4500  
Fax: +1 212 847 4599

<https://www.american-club.com>

**DECEMBER 1, 2023**

## **US COAST GUARD (USCG) POLICY LETTERS ON COMBATING SEXUAL ASSAULT AND SEXUAL HARRASSMENT (SASH) IN THE MARITIME INDUSTRY**

The USCG Office of Commercial Vessel Compliance (CG-CVC) has recently released three policy letters that are intended to provide additional guidance on the implementation of the James M. Inhofe National Defense Authorization Act (NDAA), Title 46 amendments for combating sexual assault and sexual harassment in the maritime industry.

These policy letters provide applicability, clarification, and guidance to US flagged vessels subject to inspection under 46 U.S.C. § 3301. Members should be aware that USCG Policy Letters, Marine Safety Information Bulletins and Work Instructions take effect immediately unless explicitly noted otherwise in the publications.

*Accommodations for Seamen* (codified in 46 U.S.C. § 11101) [CG-CVC Policy Letter 23-04](#) specifies what physical signage information must be posted including company policies prohibiting sexual assault and sexual harassment and procedures to report and respond to such matters.

*Audio and Video Surveillance Requirements* (codified in 46 U.S.C. § 4901) [CG-CVC Policy Letter 23-05](#) details the requirement for applicable vessels to install and maintain audio and visual surveillance systems, implement relevant crew training, and observe specific data handling protocols no later than December 23, 2024 or during the next scheduled drydock, whichever date is later.

*Master Key Control* (codified in 46 U.S.C. § 3106) [CG-CVC Policy Letter 23-06](#) provides initial guidance on implementation and management of a master key control system, control access and use of master keys, and observe specific information handling protocols.

Additionally, the Coast Guard Office of Commercial Vessel Compliance has released a November 13, 2023 update to [CVC Work Instruction 004\(3\)](#), *US Flag State Interpretations on the ISM Code*. While these instructions are not a rule and still under review, they provide industry with the USCG's current approach on safety management system related procedures and training concerning harassment, sexual harassment, and sexual assault.

The policy letters and other vessel inspection policy documents are posted on the CG-CVC website and are found by clicking [here](#).

Your Managers recommend that Members take note of this information and be guided accordingly and thank the American Bureau of Shipping for their assistance in providing this update.