

MEMBER ALERT



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

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

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UNITED STATES COAST GUARD MARINE SAFETY INFORMATION BULLETIN REGARDING COVID-19: VESSEL INSPECTIONS, EXAMS AND DOCUMENTATION

The US Coast Guard has just issued its latest Marine Safety Bulletin, MSIB Number 09-20, [Vessel Inspection, Exams and Documentation](#) (attached) how it will make liberal use of remote inspection techniques to verify vessel compliance and, if needed, defer inspections.

Your Managers recommend that Members take note of this information and be guided accordingly.



Marine Safety Information Bulletin

Commandant
U.S. Coast Guard
Inspections and Compliance Directorate
2703 Martin Luther King Jr Ave SE, STOP 7501
Washington, DC 20593-7501

MSIB Number: 09-20
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E-Mail: OutbreakQuestions@uscg.mil

Vessel Inspections, Exams, and Documentation

The uninterrupted flow of commerce on our Marine Transportation System (MTS) is critical to both National Security and National economic well-being. During this National emergency for COVID-19 it is paramount that the Coast Guard safeguards the continued operation of the MTS to ensure our domestic supply chain continues uninterrupted. Commercial vessel compliance activities should, to the extent possible, continue so as to safeguard the MTS and prevent an undue backlog from causing future delays. To facilitate the safe flow of commerce, the Coast Guard will liberally use remote inspection techniques to verify vessel compliance and, if needed, defer inspections. The following is the Coast Guard's current position on commercial vessel compliance activities:

Prior to boarding a vessel or immediately prior to conducting a pre-exam/inspection meeting, Marine Inspectors, Port State Control Officers (PSCOs), and Commercial Fishing Vessel Examiners will verify with the vessel representative that there are no ill persons onboard. Coast Guard personnel will practice the appropriate protective measures as outlined by the Centers for Disease Control and Prevention (CDC).

U.S. Flagged Vessel and Outer Continental Shelf (OCS) Inspections:

1. U.S. flagged vessels and OCS units due for Certificate of Inspection (COI) Renewals, Annual Inspections, Periodic Inspections, Dry Dock Exams, and Internal Structural Examinations (ISE) that are based on statutory or regulatory requirements should be addressed on a case-by-case basis by the local OCMI. Based on the OCMI's evaluation of the history of the vessel and in consultation with the vessel owner or operator, the OCMI may:
 - Require Coast Guard attendance onboard the vessel to conduct a full or abbreviated inspection;
 - Accept objective evidence such as recent classification surveys, pictures, video, vessel logs, machinery alarm reports, etc., in lieu of Coast Guard attendance onboard the vessel to credit a required inspection or exam. (A dry dock, pressure vessel, or other non-annual exam may only be credited for a maximum of one year.);
 - Defer a required inspection or exam for up to 90 days; or
 - Issue a CG Form CG-835V to restrict the vessel movement as a worklist item.
2. Recognized Organizations (ROs) and Third Party Organizations (TPOs) that are conducting surveys and audits on behalf of the Coast Guard may request extensions on a case-by-case basis on behalf of the vessel owner or operator. This includes both internal and external surveys for those companies/vessels subject to Subchapter M requirements. Surveys and audits that require travel to or through high-risk affected areas will generally constitute sufficient reason for the Coast Guard to grant an extension. When evaluating if an extension will be granted, the OCMI or the Office of Commercial Vessel Compliance (CG-CVC) will evaluate the vessel's history of compliance and may require objective evidence to verify if the vessel complies with the applicable laws and regulations. Any extension of a statutory or

regulatory required survey or audit will be documented in writing by the RO/TPO and should generally not be more than 90 days. ROs/TPOs that seek to use remote survey in lieu of attendance on vessels that are both classed and certificated should contact the Flag State Control Division (CG-CVC-4) or the Towing Vessel National Center of Expertise (TVNCOE) to propose the methods and administrative procedures that will be used. Extension requested for vessels subject to Subchapter M requirements should be relayed by the TPO to the OCMI.

3. The same allowances should be considered for companies that are required to complete internal vessel and management audits as required by ISM or TSMS. These companies should work through their RO/TPO for extension requests; however, extensions granted for this work is not required to be reported to the CG, but rather documented by company and RO/TPO.

Port State Control (PSC) Exams:

1. The Coast Guard will continue to use a risk based program to determine which vessels will be required to undergo a Port State Control Exam. The Coast Guard will not issue deficiencies or detain vessels for expired certificates, documents or mariner credentials until October 1, 2020.
2. Certain Certificate of Compliance (COC) exams are a statutory and regulatory requirement. Based on the OCMI's evaluation of the history of the vessel, the OCMI may:
 - Require Coast Guard attendance onboard the vessel to conduct a full or abbreviated exam;
 - Accept objective evidence such as vessel status within Qualship 21, previous port state or flag state exams, recent classification surveys, pictures, video, vessel logs, machinery alarm reports, etc. in lieu of Coast Guard attendance onboard the vessel to credit a required inspection or exam; or
 - Defer a required inspection or exam for up to 90 days

Fishing Vessel Safety (FVS) Exams:

1. U.S. flagged commercial fishing industry vessels that are due for a 5 year commercial fishing vessel safety dockside exam that is based on statutory or regulatory requirements, will be addressed on a case-by-case basis by the local OCMI.
2. Based on the OCMI's evaluation of the history of the vessel and in consultation with the vessel owner or operator, the OCMI may:
 - Require Coast Guard attendance onboard the vessel to conduct a full or abbreviated exam; or
 - Defer a required exam for up to 90 days.
3. If a deferral is made, the OCMI will issue a letter of deferral to the vessel owner/operator. The letter of deferral will be retained on board the vessel.
4. Accepted Organizations (AO) and Similarly Qualified Organizations (SQO) that are recognized TPOs conducting FVS Exams on behalf of the Coast Guard. The TPO may defer a required FVS Exam for up to 90 days. If a deferral is made, a signed letter of deferral will be issued by the TPO to the vessel owner/operator. The letter of deferral will be retained on board the vessel. If a deferral is made, the TPO shall notify the cognizant OCMI or Coast Guard District Commercial Fishing Vessel Safety (CFVS) Coordinator.

Commercial Fishing Industry:

1. Certain commercial fishing vessels request a FVS Exam prior to carrying a National Oceanic & Atmospheric Administration National Marine Fisheries Service (NOAA-NMFS) observer. These requests shall continue to be coordinated through the cognizant OCMI. Processing and accommodating requests for a FVS Exam will be addressed on a case-by-case basis by the OCMI.

For additional information, please use the following contact information:

U.S. Flagged vessels CGCVC@uscg.mil

PSC examinations PortStateControl@uscg.mil

Commercial Fishing Vessel Safety CGFishSafe@uscg.mil

Richard V. Timme, RDML, U. S. Coast Guard, Assistant Commandant for Prevention Policy sends