



Office of Commercial Vessel Compliance (CG-CVC)

U.S. Supplement Frequently Asked Questions (FAQ)

Information

Introduction

In order to best serve our customers, we have compiled a list of answers to frequently asked questions. The guidance in these FAQs are not a substitute for applicable legal requirements and are not intended to impose legally-binding requirements on any party. If you want to discuss any topic with the Flag State Control Division (CG-CVC-4), you may contact us at FlagStateControl@uscg.mil.

Frequently Asked Questions

- 1. Does the new single U.S. Supplement supersede all other supplements?**
 - No, vessels previously enrolled in the Alternate Compliance Program (ACP) under a different supplement will continue to meet that supplement unless the owner or operator requests to meet the new single U.S. Supplement in its entirety.
 - Vessels proposed for ACP enrollment, including provisional enrollment, on or after the date the single U.S. Supplement is published, will meet the U.S. Supplement. Previous supplements will no longer be assigned to vessels enrolling in the ACP.
- 2. Can owners or operators request to meet the new single U.S. Supplement for an existing vessel enrolled in the ACP?**
 - Yes, owners or operators may request to meet the new single U.S. Supplement in its entirety for a particular vessel. All requests to switch to the single U.S. Supplement must be made to Commandant (CG-CVC-4) through the local Officer in Charge, Marine Inspection (OCMI). OCMI's may email these requests to CG-CVC-4 at FlagStateControl@uscg.mil.
 - Once the request and OCMI endorsement are received by CG-CVC-4, a new ACP enrollment letter will be issued for the vessel indicating the updated applicable U.S. Supplement.
- 3. Can owners or operators request to meet older supplements so long as the supplement does not predate the vessel's keel laid date?**
 - No, owners or operators may choose to comply with the most recent U.S. Supplement, but cannot change to an older U.S. Supplement. However, existing vessels enrolled in the ACP will continue to meet their existing U.S. Supplement unless the owner or operator chooses to comply with the most recent U.S. Supplement.
 - If a vessel cannot meet the requirements of the U.S. Supplement, but the desired requirements exist in a previous supplement, the owner or operator may request a Design Basis Agreement (DBA) from the Office of Design and Engineering Standards (CG-ENG) which incorporates the desired requirements. All DBAs are reviewed and approved by the Coast Guard.
- 4. Do existing Coast Guard work instructions and policy letters, including District or OCMI policies, still apply to my vessel if it is enrolled in the ACP?**



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- Yes, Navigation and Vessel Inspection Circulars (NVIC), CG-CVC work instructions, and policy letters related to International Maritime Organization (IMO) instruments or explicitly involving the ACP do apply to vessels enrolled in the ACP. For example, the Office of Commercial Vessel Compliance (CG-CVC) work instruction 004, "U.S. Flag Interpretations on the ISM Code," does apply to vessels enrolled in the ACP.
 - District or OCMI policies related to a particular inspection subchapter or vessel type, which create an alternate or conflicting standard to the ACP Standard, do not apply to vessels enrolled in the ACP.
 - Unless otherwise authorized by formal correspondence, Coast Guard policy or similar, ROs must adhere to all applicable IMO Interpretations, published IACS Unified Interpretations and Requirements, and published Coast Guard interpretations.
 - ROs must adhere to and apply Coast Guard work instructions, NVICs, and policy letters to vessels enrolled in the ACP to the extent they are authorized or permission has been granted.
 - If an RO is unsure if they can or should apply a particular Coast Guard work instruction, NVIC, or policy letter, guidance should be requested from CG-CVC-4 at FlagStateControl@uscg.mil.
 - If there exists a conflict between an ACP requirement, found in either an IMO instrument, Recognized Organization (RO) rule, or U.S. Supplement, and a requirement found in Coast Guard work instruction, NVIC, or policy letter, guidance should be requested from CG-CVC-4 at FlagStateControl@uscg.mil.
- 5. Are there further efforts to eliminate the gap between U.S. requirements and international standards, thereby further reducing the single U.S. Supplement?**
- Yes, the Coast Guard's intent is to continue to reduce the gap between U.S. requirements and international standards. The Coast Guard does this by taking an active role in the development of international standards and updating U.S. requirements as appropriate.
- 6. Can owners or operators still submit exemption and equivalency requests as alternatives to meeting the U.S. Supplement?**
- Yes, the process for exemptions and equivalencies can be found in NVIC 2-95 CH-3.
- 7. What happens when a requirement existed in a previous supplement, but no longer appears in the single U.S. Supplement?**
- If a particular requirement is missing from the U.S. Supplement, it should be assumed that the IMO instruments and RO's rules sufficiently cover the topic.
 - Specific questions or requests to update the U.S. Supplement should be directed to the Supplement Manager at FlagStateControl@uscg.mil.
- 8. Do vessels enrolled in the ACP have to comply with Title 46 Code of Federal Regulations (CFR)?**
- Vessels enrolled in the ACP meet an alternative standard for compliance with Title 46 CFR requirements. Unless expressly stated in the U.S. Supplement,



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vessels enrolled in the ACP do not have to comply with all of the requirements of 46 CFR. Instead, they must comply with the ACP Standard which consists of IMO instruments, the RO's rules, and the assigned U.S. Supplement.

9. Where can I find previous supplements?

- The supplements that were valid up to release of the single U.S. Supplement can be found [here](#).
- Previous supplements which had been superseded before the release of the single U.S. Supplement can be found at the following links:
 - [ABS](#)
 - [ClassNK](#)
 - [DNV](#)
 - [DNV GL](#)
 - [GL](#)
 - [LR](#)

10. How do I know if an RO is authorized to participate in the ACP? What certificates can they issue on behalf of the Coast Guard?

- ACP authorization is granted per each individual RO's agreement with the Coast Guard. The list of RO agreements can be found [here](#).
- For easy reference, a table of authorizations can be found [here](#).

11. What vessels can enroll in the ACP? Does Section 1.7 of the U.S. Supplement about DBAs allow vessels without international certificates to enroll in the ACP if they have a DBA?

- U.S. flag vessels certificated for international voyages, classed by a recognized classification society that is authorized by the Coast Guard to participate in the ACP, and whose vessel type is authorized to participate in the ACP per the applicable subchapter of 46 CFR chapter I, are authorized to enroll in the ACP.
- Vessels enrolled in the ACP must maintain applicable certificates for international voyages. The use of a DBA in lieu of strict adherence to the U.S. Supplement does not excuse compliance with international standards.

Helpful Links:

[U.S. Supplements](#)
[Classification Society Authorizations](#)
[Navigation and Vessel Inspection Circulars \(NVIC\)](#)
[NVIC 02-95, CH-3: The Alternate Compliance Program \(ACP\)](#)
[CG-CVC Policy Letters](#)
[CG-CVC Work Instructions](#)
[ACP Tactics, Techniques, and Procedures \(TTP\)](#)
[CG-CVC Contact List](#)
[Marine Inspections Contact List](#)
