



Office of Commercial Vessel Compliance (CG-CVC)

U.S. Supplement Frequently Asked Questions (FAQ)

Information

Introduction	To best serve our customers, we have compiled a list of answers to frequently asked questions. The interpretations 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 .
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Frequently Asked Questions

- 1. Does the revised U.S. Supplement supersede all other supplements?**
 - The U.S. Supplement released on November 12, 2025, supersedes all previous U.S. Supplements and applies to a vessel enrolled, provisionally enrolled, or proposed for enrollment, in the Alternate Compliance Program (ACP) on or after the issue date of the revised U.S. Supplement.
 - Vessels which were built to a previous U.S. Supplement or enrolled in the ACP under a previous U.S. Supplement, are not expected to retroactively meet the design and construction standards outlined in the revised U.S. Supplement. Specifically, those requirements in sections 3 and 4 of the revised U.S. Supplement generally will not be applied retroactively unless stated otherwise. Note that section 4 has specific applicability statements for both operational and design requirements contained in that section.
- 2. Can owners or operators request to meet the revised U.S. Supplement for an existing vessel enrolled in the ACP?**
 - The revised U.S. Supplement will be used for all vessels enrolled in the ACP. This is now the standard and does not require action from the vessel owner or operator.
 - A vessel provisionally enrolled in the ACP prior to the release of the revised U.S. Supplement on November 12, 2025, may choose to meet the previously assigned U.S. Supplement on the provisional ACP enrollment letter, or the revised U.S. Supplement.
 - If choosing to meet the revised U.S. Supplement, the vessel owner or operator must coordinate with the designated Recognized Organization (RO) for the vessel to ensure the vessel will meet the updated standards. Once that is determined, the request can be sent to CG-CVC-4 through the local OCMI to have the provisional ACP enrollment letter updated to include the revised U.S. Supplement.
 - If the previously assigned U.S. Supplement will continue to be used, no action is needed by the owner or operator. The design and construction will continue to be subject to the assigned U.S.



Office of Commercial Vessel Compliance (CG-CVC)

U.S. Supplement Frequently Asked Questions (FAQ)

Supplement on the provisional ACP enrollment letter. However, after delivery and initial certification, the operational requirements of the revised U.S. Supplement (i.e. sections 1 and 2 of the revised U.S. Supplement) will be applied to the in-service vessel.

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 not choose to comply with an older U.S. Supplement.

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?

- 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, 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 apply unless they create an alternate or conflicting standard to the ACP Standard.
- 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 the office that promulgated the document. If the office is unknown, guidance can 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.



Office of Commercial Vessel Compliance (CG-CVC)

U.S. Supplement Frequently Asked Questions (FAQ)

5. Are there further efforts to eliminate the gap between U.S. requirements and international standards, thereby further reducing the 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 and additional guidance has been added to the revised U.S. Supplement in section 1.7.

7. What happens when a requirement existed in a previous supplement, but no longer appears in the revised U.S. Supplement?

- If a particular requirement is missing from the revised U.S. Supplement, but existed in the previous 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 inspection and certification than those found in Title 46 CFR requirements. Unless expressly stated in the U.S. Supplement, vessels enrolled in the ACP do not have to comply with all the requirements of their vessel-specific subchapter of Title 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. Other requirements in 46 CFR, such as the documentation requirements in Subchapter G, still apply.

9. 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](#).

10. What vessels can enroll in the ACP? Does Section 1.7 of the U.S. Supplement 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



Office of Commercial Vessel Compliance (CG-CVC)

U.S. Supplement Frequently Asked Questions (FAQ)

applicable inspection subchapter of Title 46 CFR, chapter I, are authorized to enroll in the ACP. The following inspection subchapters are authorized to participate in the ACP:

- D – Tank Vessels (non-self-propelled vessels are not eligible for ACP)
- H – Passenger Vessels
- I – Cargo and Miscellaneous Vessels
- I-A – Mobile Offshore Drilling Units
- L – Offshore Supply Vessels
- U – Oceanographic Research Vessels

- 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.

11. The revised U.S. Supplement says Section 3, U.S. Supplemental Requirements and Interpretations, is only applicable to provisionally enrolled vessels or those undergoing a major modification. If my vessel was enrolled in the ACP under a previous supplement and I replace lifesaving equipment, does it need to meet the section 3.3, Coast Guard Type Approvals section from the revised U.S. Supplement?

- Yes. Generally, section 3 of the revised U.S. Supplement only applies to provisionally enrolled vessels or those undergoing major modification. However, any alterations, modifications, new installations, or retrofitting on a vessel enrolled in the ACP must meet the standards set out in the revised U.S. Supplement, including any amendments or revisions to IMO instruments, the RO's rules, or the U.S. Supplement, including section 3.3 for type approvals.

12. I manage a vessel that had enrolled in the ACP under an old supplement to the authorized classification society's (ACS) rules. Can I replace a piece of equipment "in-kind" that met the older standard from the previously assigned ACS supplement?

- Generally, equipment that constitutes a "replacement in kind" is permitted provided the equipment conforms to the ACS rules and international standards. For this purpose, "replacement in kind" is considered replacement of original equipment with equipment that is identical in fit and form to the original and where no modification or upgrade is completed.

13. The U.S. Supplement revision now has a specific requirement for testing and inspecting boilers on vessels in the ACP (paragraph 2.3). Noting this requirement is in section 2 and applicable to all vessels in the ACP, what is the expectation for testing and inspecting boilers on existing vessels that may not have been following these requirements prior to this revision? Do the boilers need to be tested at the next annual to catch up?

- Power boilers that would otherwise be subject to 46 CFR Part 52 and heating boilers that would otherwise be subject to 46 CFR Part 53 must comply with



Office of Commercial Vessel Compliance (CG-CVC)

U.S. Supplement Frequently Asked Questions (FAQ)

46 CFR 61.05, including the inspection and testing requirements at the intervals specified.

- If the inspections or tests have not been conducted within the specified timeframe required by 46 CFR 61.05, the owner or operator should coordinate an appropriate timeline to conduct the required inspections or tests with their ACS and the local OCMI. When determining the timeline for compliance, the ACS and OCMI should consider alignment with the appropriate surveys for the covered piece of equipment. However, in all cases the ACS and OCMI may require more immediate inspection or testing to determine that the complete unit is safe and in satisfactory condition.

14. I manage a vessel that had enrolled in the ACP using an old ABS supplement to their class rules. If we do a transfer of class to DNV, what supplement will the vessel be expected to follow?

- The revised U.S. Supplement published on November 12, 2025, should be used for all vessels enrolled in the ACP. Each section of the revised U.S. Supplement has specific applicability. In general, each in-service vessel must follow sections 1 and 2 of the revised U.S. Supplement. A new construction vessel, or one undergoing a major modification, would be expected to follow section 3 of the revised U.S. Supplement. Additionally, any alteration, modification, or replacement of equipment that is not a replacement in kind must also follow section 3 of the revised U.S. Supplement. Section 3 of the revised U.S. Supplement is not meant to be applied to an in-service vessel that is not undergoing a modification, alteration, or replacement that is not in kind. Section 4 of the revised U.S. Supplement has specific applicability and is detailed in that section.
- The previous ABS supplement may be used as a reference for the design and construction of the vessel, but it should not be used going forward for any modifications, alterations, nor equipment replacements that are not in-kind replacements.

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](#)

[Prevention Directory Contact List](#)