



USCG Office of Commercial Vessel Compliance (CG-CVC)
Mission Management System (MMS) Work Instruction (WI)



Category	Domestic Vessel Inspections			
Title	Articulated Tug-Barge (ATB) Vessel Manning: James Inhofe National Defense Authorization Act (NDAA) for Fiscal Year 2023, H.R. 7776, SEC. 11508			
Serial	CVC-WI-037(1)	Orig. Date	08MAY26	Rev. Date N/A
Disclaimer:	This guidance is not a substitute for applicable legal requirements, nor is it itself a substantive regulation. It is not intended to nor does it impose legally-binding requirements on any party. It represents the Coast Guard’s current thinking on this topic and may assist industry, mariners, the public, and the Coast Guard, as well as other federal and state regulators, in applying statutory and regulatory requirements. You can use an alternative approach for complying with these requirements if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach (you are not required to do so), you may contact the Coast Guard Domestic Vessel Compliance Division (CG-CVC-1) at CGCVC@uscg.mil who is responsible for implementing this guidance.			
References:	<ul style="list-style-type: none"> (a) James M. Inhofe National Defense Authorization Act (NDAA) for Fiscal Year 2023, H.R. 7776, SEC. 11508, Articulated Tug-Barge Manning (b) 46 Code of Federal Regulations (CFR) Subchapter M – Towing Vessels (c) 46 CFR Part 15.501 - Certificate of inspection. (d) 46 CFR Part 15.505 - Changes in the certificate of inspection. (e) COMDINST M16000.8B USCG Marine Safety Manual, Vol. III: Marine Industry Personnel (f) 46 CFR § 15.820(a)(1), Chief engineer (g) 46 CFR § 15.1109, Watches (h) 46 CFR § 15.1111, Work hours and rest periods (i) Standards of Training, Certification and Watchkeeping for Seafarers (STCW) Convention, Regulation VIII/2, Watchkeeping arrangements and principles to be observed (j) STCW Code, Section A-VIII/2, Watchkeeping arrangements and principles to be observed 			

- A. **Purpose.** This work instruction (WI) provides implementation guidance for Reference (a), which authorizes Officer in Charge, Marine Inspection (OCMI) to issue amended certificates of inspection (COI) for certain articulated tug-barge (ATB) units inspected under Reference (b).
- B. **Action.** Coast Guard District Commanders, Sector Commanders, Prevention personnel, and owners and managing operators should use this WI to assist with requests for reduced manning proposals for applicable inspected towing vessels per Reference (b), forming part of an articulated tug-barge (ATBs) unit, with approved engineering automation as identified within Reference (a).
- C. **Background.**
1. “The James M. Inhofe National Defense Authorization Act (NDAA) for Fiscal Year 2023 (Reference (a)) was signed into law December 23, 2022. Section 11508 of the NDAA, titled Articulated Tug-Barge Manning, states:
 - a. In General.—Notwithstanding the watch setting requirements set forth in section 8104 of title 46, United States Code, the Secretary shall authorize an Officer in Charge, Marine Inspection to issue an amended certificate of inspection that does not require engine room watch setting to inspected towing vessels certificated prior to July 19, 2022, forming part of an articulated tug-barge unit, provided that such vessels are equipped with engineering control and

monitoring systems of a type accepted for no engine room watch setting under a previously approved minimum safe manning document or certificate of inspection for articulated tug-barge units.

b. Definitions. –In this section:

- 1) Certificate of Inspection.—The term “certificate of inspection” means a certificate of inspection under subchapter M of chapter I of title 46, Code of Federal Regulations.
- 2) Inspected Towing Vessel.—The term “inspected towing vessel” means a vessel issued a certificate of inspection.”

2. Vessel “manning” prescribes both the number of persons required to safely operate a vessel and the credentialing requirements for those required persons serving aboard the vessel. While watchkeeping and manning are interrelated, there are separate standards in statutes, regulations, and policies that guide Coast Guard approval of an owner’s manning proposal and subsequent COI requirements per Reference (c) and (d). Guidance pertaining to vessel manning for automated vessels is found in Reference (e). A chief engineer or other individual credentialed to serve as chief engineer is required for a seagoing vessel greater than 200 GRT in accordance with Reference (f).

3. If an owner or managing operator provides evidence that the vessel is eligible in accordance with the criteria below, then the CG is authorized to issue an amended COI reducing the required number of licensed engineers from 3 to 2¹: (1 Chief Engineer and 1 Assistant Engineer). This reduction is limited to domestic voyages, or international voyages to Canada, and is subject to the additional conditions discussed within this WI.

- a. Subchapter M inspected towing vessel that is an ATB; and
- b. has a GRT between 200 and 300 GTs; and
- c. has a valid COI with a Periodically Unmanned Machinery Space (PUMS) endorsement; and
- d. had a valid COI or Safe Manning Document (SMD) issued before July 19, 2022; and
- e. that previous COI or SMD had authorized reduced engine room manning.

D. Discussion. Per 46 USC § 8101 Complement of inspected vessels – requires the COI issued to an inspected vessel “shall state the complement of licensed individuals and crew (including lifeboatman) considered by the Secretary to be necessary for safe operation.” Additionally, “[t]he Secretary may modify the complement, by endorsement on the certificate, for reasons of changed conditions or employment”. Reference (a) authorizes the OCMI to issue an amended COI if all of the requirements annotated within section 11508 of the NDAA are met. This section outlines actions that may be taken when reviewing manning proposals received pursuant to Reference (a):

1. Vessel owners/operators must submit a manning proposal to the cognizant OCMI per Reference (c) and (d), demonstrating compliance with all conditions in this WI.
2. OCMI must verify that all conditions are met before issuing an amended COI. This includes physical inspection of automated systems and review of shore-based support arrangements.
3. Reference (a) pertains to previously issued SMDs or a COI issued prior to July 19, 2022, and not to any current or future allowances.
4. Any removal of approved automated control and monitoring systems or failure to maintain compliance with any requirement of the WI, will result in manning levels restored back to statutory minimum requirements.

¹ Per 46 U.S.C. § 8301 (d)(2), the Secretary may increase the number of licensed individuals on a vessel to which this chapter applies if, in the Secretary's judgment, the vessel is not sufficiently manned for safe operation.

5. This reduction in manning is only authorized while the ATB is operating as an inspected towing vessel under Reference (b). If the vessel is a multi-service vessel, subject to inspection under other relevant subchapters of Title 46 CFR, the ordinary minimum manning is required for such other operations, regardless of voyage or route.

E. Guidance. The following conditions must be verified by the cognizant OCMI, prior to an amended COI being issued:

1. Vessel Eligibility:

- a. The ATB has a valid COI currently (inspected to Reference (b)); and
- b. the ATB towing vessel was issued a valid COI, under Reference (b), prior to July 19, 2022²; and
- c. the COI has a valid Periodically Unattended Machinery Space (PUMS)³ endorsement by the Coast Guard⁴; and
- d. the vessel had a previously issued COI or SMD with reduced engine room manning.

2. Technical Requirements:

- a. The current automated control and monitoring system onboard must be verified by the Coast Guard that it is installed and operating in good working order.⁵ The Coast Guard is required to authorize the PUMS prior to use for reduced manning authorizations per Reference (e). Documentation of this CG approval is still required. Documentation of having a Class notation for Automatic Centralized Control Unmanned (ACCU) does not mean that the CG has approved the installation for reduced manning.
- b. Any alterations or failure of the automated control and monitoring system must be reported immediately to the nearest OCMI. If the automation is not operable, engineering manning levels will be increased to that of a vessel without an automated control and monitoring system.

3. Operational Restrictions:

- a. The amended COI which authorizes reduced manning in accordance with this WI must be restricted to domestic routes and international voyages to Canada (other international routes

² If a vessel was issued a COI under subchapter M but later was determined to meet the tonnage and route requirements of Subchapter I, or any other inspection subchapter, this WI is not applicable.

³ Per Reference (e) Part B, Chapter 3 Section B.2.d.(2)e)3) (page B3-8): Prior to July 2016 Sub M towing vessel regulation implementation, it was authorized "For *uninspected* towing vessels to receive safe manning documentation endorsed for Periodically Unattended Machinery Space (PUMS), operators may present the OCMI with a Certificate of Class appropriately endorsed for unattended machinery status or meet the U.S. requirements (e.g. 46 CFR Part 62). Alternatively, as Part 62 and MSM Volume III Chapter B6 are not necessarily applicable to uninspected vessels, NVIC 1-78 may be used to establish PUMS." Therefore, previously approved Safe Manning Documents (SMD) issued to an uninspected vessel, may have utilized a certificate of Class with an ABCU or ACCU class notation as objective evidence for a previous PUMS notation approval.

⁴ If a vessel has an automated engineering system that qualifies for PUMS authorization but does not yet have the endorsement on its COI, the owner/operator must first secure the PUMS authorization from the cognizant OCMI before requesting a manning reduction. See MSM Vol III Chapter 2 Part B Section B.W.3.b. (page B2-47 & 48)

⁵ Per Reference (e) Chapter 6 Part B Section A.3.a. (page B6-3) "The Officer in Charge, Marine Inspection (OCMI) shall review and approve all requests for reductions in engine room manning, including requests to operate minimally attended or periodically unattended machinery spaces (MAMS/PUMS). The examination shall include a detailed analysis of the following: (1) the capabilities of the automated system; (2) the combination of the personnel, equipment, and systems necessary to ensure the safety of the vessel, personnel and environment in all sailing conditions; (3) the ability of the crew to perform all evolutions including emergencies and during control or monitoring system failure; (4) a planned maintenance program with regular testing and inspection procedures; and (5) the automated system's demonstrated reliability during its initial trial period and its continued reliability. Critical consideration shall be given to the degree of vital system automation, status of automation approval by the Marine Safety Center (MSC) and status of testing required by 46 CFR 61.40."

or routes that include Canada and another international stop, including one-time voyage requests, are not allowed). No further reductions on manning will be authorized (even on voyages of less than 600 NM).

- b. When operating under an amended COI that has authorized reduced manning amendment, the voyage may exceed 600 nautical miles; however, the ATB towing vessel's route should ensure it always remains within 600 nautical miles of a harbor of safe refuge. For this operation, a harbor of safe refuge⁶ is defined as a U.S. domestic port capable of accommodating both the towing vessel and barge in the event of a marine casualty, especially one involving the automated engineering system or other engineering systems. Following a casualty that has impacted the automated engineering system, the vessel must remain at the harbor of safe refuge until either the automated engineering system is restored to full operation or an additional, appropriately licensed engineer is embarked.

4. Manning and Work/Rest Requirements⁷:

- a. Manning proposals should specify how they will meet and maintain the work/rest requirements per Reference (f) through (j)⁸.
- b. There are no violations of statutory or convention hours of work/rest (See Reference (f) through (j)).
- c. If the vessel is also authorized for conditional occupancy with respect to the ATB barge, the engineering officers required by the ATB towing vessel for the minimum manning (COI) and watch requirements, must have no assigned duties on the associated barge. The applicable safety management system (SMS)⁹ procedures and/or emergency response procedures should document this information and requirements.

5. Support Systems:

- a. The ATB towing vessel's operational route should provide scheduled access to qualified shore-based maintenance facilities and personnel for routine and preventive maintenance activities, as detailed in the submitted manning proposal. As applicable, the vessel's SMS should incorporate comprehensive procedures governing shore-based maintenance operations and emergency response protocols.
- b. The ATB towing vessel should be monitored by the Company (owner or managing operator as specified in the SMS or emergency response procedure, as applicable) through a 24/7 shore-based operations center.

6. Compliance and Documentation:

- a. The ATB towing vessel is maintained in full compliance with the terms of its COI per 46 CFR § 136.200.

⁶ 46 CFR 136.110 Definitions – Harbor of safe refuge means a port, inlet, or other body of water normally sheltered from heavy seas by land, and in which a vessel can navigate and safely moor. The suitability of a location as a harbor of safe refuge will be determined by the cognizant OCMI, and varies for each vessel, dependent on the vessel's size, maneuverability, and mooring gear.

⁷ Manning is not a delegated function to a Class Society, Recognized Organization, or a Third Party Organization.

⁸ Per Reference (e) Chapter 2 Part B Section W.3.b (page B2-48), "Prior to any reductions in engineering personnel, the OCMI must be satisfied with the arrangements to ensure adequate watchkeeping, hours of rest, and provisions for onboard maintenance."

⁹ 46 CFR 136.110 Definitions - *Safety Management System* or *SMS* means a structured and documented system that enables personnel involved in vessel operations or management, as identified in the SMS, to effectively implement the safety and environmental protection requirements of this subchapter, and is routinely exercised and audited.

- b. The vessel maintains compliance with all applicable SMS requirements and emergency response procedures including updates that reflect reduced engine room manning. The Coast Guard must verify and review these procedures.

F. CG Documentation.

1. This WI does not create a policy that permits a blanket or automatic allowance. Owners and managing operators should make a request for a manning reduction in writing and provide evidence that they meet the requirements specified within Reference (a) and described in this WI.
2. Upon CG review of all the elements required, if approved, the OCMI is not required to issue a separate approval letter. Instead, the OCMI must document all elements of the requirements met or not met, in a CG Inspection Activity and add an *endorsement to the COI routes/conditions* that reads:

“This vessel has been evaluated for and approved for reduced engine room manning in accordance with the FY2023 Inhofe National Defense Authorization Act – ATB Manning. On domestic, and international voyages to Canada, > than 600 NM only, the engine room manning may be reduced to: 1 Chief Engineer and 1 Assistant Engineer”

3. If the request is denied, no endorsement is required. However, the Coast Guard must provide a written response describing why the manning request is being denied. COMDT-CVC must be copied on the response.
4. The list of items in section E. of this WI must be documented in the narrative of an Inspection Activity: Administrative.
 - a. The Coast Guard must scan into MISLE all documents provided by the Company.
 - b. The activity title must be: FY2023 Inhofe National Defense Authorization Act – ATB Manning Request.
5. A *Special Note* must be added to the vessel profile:

“This vessel has been evaluated for and approved for reduced engine room manning in accordance with the FY2023 Inhofe National Defense Authorization Act. See MISLE [Insert Activity#]”

G. Appeals. Appeals of decisions made under this WI letter follow the procedures outlined in 46 CFR § 1.03.

H. Questions. Questions concerning this WI and guidance may be directed to the Office of Commercial Vessel Compliance, COMDT (CG-CVC), via CGCVC@uscg.mil. This WI and other domestic vessel policy documents are posted on the CG-CVC website at: <https://www.dco.uscg.mil/Our-Organization/Assistant-Commandant-for-Prevention-Policy-CG-5P/Inspections-Compliance-CG-5PC-/Commercial-Vessel-Compliance/CVCmms/>.

Corydon F. Heard IV

C.F. HEARD IV

Captain, U.S. Coast Guard

Chief, Office of Commercial Vessel Compliance

By direction