MEASUREMENT ORGANIZATION WEEKLY NOTES - 04/01/2020

REMOTE INSPECTIONS AND SURVEYS The Coast Guard's Assistant Commandant for Prevention Policy issued Marine Safety Information Bulletin (MSIB) 09-20, describing how the Coast Guard will use remote inspection techniques for commercial vessel compliance purposes in response to the COVID-19 outbreak. It also addresses certain ACS surveys conducted on the Coast Guard's behalf, subject to case-by-case approval. Because tonnage measurement surveys are performed under a different authority, the provisional ACS remote tonnage survey authorizations described in recent Weekly Notes editions need not be on a case basis. Last week, the MSC granted its first authorization for such remote tonnage surveys in response to the COVID-19 outbreak.



Marine Safety Information Bulletin

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MSIB Number: 09-20 Date: March 26, 2020

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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

- 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 vear.):
 - 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

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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.

Weekly Notes are issued by the Coast Guard Marine Safety Center's Tonnage Division (MSC-4) for use by organizations that perform measurement work on the Coast Guard's behalf. They are for informational purposes only, and are not intended as, nor should they be construed to represent, revisions of or substitutes for applicable statutes or regulations or established interpretations of either.