

# TOWING SAFETY ADVISORY COMMITTEE (TSAC) TASK STATEMENT

## Task # 16-01

### I. TASK TITLE

“Recommendations on the Implementation of 46 Code of Federal Regulations Subchapter M – Inspection of Towing Vessels” (Short Title: Subchapter M Implementation)

### II. BACKGROUND

The Coast Guard has completed its work on the creation of a regulation to inspect commercial towing vessels. The Final Rule published on 20 June 2016 established the safety standards that towing vessels must meet in order to receive a Certificate of Inspection from the U.S. Coast Guard. In anticipation of the need for additional guidance on the implementation of this regulation, the Coast Guard Headquarters Office of Commercial Vessel Compliance (CVC) with assistance from the Towing Vessel National Center of Expertise (TVNCOE) has created a Navigation and Vessel Inspection Circular (NVIC) to clarify many of the processes involved.

### III. PROBLEM STATEMENT

CVC and the TVNCOE created the NVIC and its associated enclosures to assist the industry, our CG field inspectors and their leadership with the implementation of Subchapter M. While the Final Rule was in clearance, the Coast Guard was unable to share this guidance with the industry or its own end users in the field. Now that Subchapter M is published, we can share this draft guidance with the industry for their review and comment.

In fact, this guidance will be published in the Federal Register within the next few weeks. The public will be given 60 days to provide their comments and concerns.

### IV. TASK

Following the publication of Subchapter M Final Rule, the associated NVIC and enclosures, the Coast Guard requests that TSAC review the implementation guidance and provide their expert opinion and recommendations.

This task may result in more than one report to the Coast Guard as we are expecting to draft additional NVIC enclosures as we proceed towards the eventual issuance of COIs to towing vessels.

TSAC is tasked with:

1. Review and comment on the draft NVIC and enclosures as soon as they are published in the Federal Register.
2. Review any additional implementation guidance documents including future draft enclosures or revisions to the NVIC.
3. Provide any additional comments on the implementation of Subchapter M that the Committee feels are necessary, which may include special attention to the unique aspects of Subchapter M as compared to past Coast Guard vessel compliance rulemakings (e.g., Towing Safety Management Systems, use of Third Party Organizations (TPOs), and the implementation of the TSMS Option inspection regime).

V. ESTIMATED TIME TO COMPLETE TASK

TSAC will provide an Interim Final Report regarding its review and recommendation of the initial NVIC and enclosures to the Coast Guard at its Fall 2016 meeting. The Committee will keep the task open in anticipation of the Coast Guard's creation and publication of additional guidance materials after that.

VI. COAST GUARD TECHNICAL REPRESENTATIVES

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VII. TSAC CONTACT

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