



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



Category	Domestic Inspection Program			
Title	Requests for Inspected Vessels to Participate in Disaster Relief Operations			
Serial	CVC-WI-034(1)	Orig. Date	22JAN26	Rev. Date N/A
Disclaimer:	<p>This guidance is not a substitute for applicable legal requirements, nor is it itself a 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 and Offshore Compliance Division (CG-CVC-1) at CGCVC@uscg.mil who is responsible for implementing this guidance.</p>			

- A. Purpose. To provide guidelines to the Coast Guard and industry partners on permitting vessels to operate beyond the scope of their Certificate of Inspection (COI) when supporting disaster relief operations.
- B. Action. All units should apply this guidance when considering requests for vessels to participate in disaster relief efforts.
- C. Background. The Coast Guard recognizes that an emergency increase in maritime transport capability is an efficient and effective means to provide relief supplies following natural disasters. Vessels operating within the conditions outlined in their COI generally do not need additional permission from the Coast Guard to engage in relief operations. However, in situations where additional vessels are needed to support disaster relief efforts, vessels attempting to operate beyond the scope of their COI may require additional administrative determination and/or an onboard inspection from the Coast Guard.
- D. Policy. Vessel owners and operators should submit requests to operate beyond the scope of their COI for disaster relief operations in writing to the local Officer in Charge, Marine Inspection (OCMI). If necessary, the OCMI will forward the request to the appropriate Headquarters office for action. Requests should be accompanied by documentation showing the need for the vessel's services, a gap analysis of the regulations that the vessel does not meet, and a description of the relief activities that the vessel will perform.
- E. Guidelines.
 1. Exemptions or equivalencies for international certificates. For voyages that require an international certificate¹, an owner or operator may request an exemption or an equivalency from CG-CVC. A Safety of Life at Sea (SOLAS) exemption may authorize a vessel to make a single voyage without the appropriate international certificates; however, the exemption does not

¹ 74 SOLAS (20) 1/2(d) (International voyage means a voyage from a country to which the present Convention applies to a port outside such country, or conversely.); 46 CFR § 2.01-8(a)-(b) ("For details regarding application of Convention requirements to tankships, see § 30.01-6 of this chapter; to passenger vessels, see § 70.05-10 of this chapter; to cargo ships other than tankships, see § 90.05-10 of this chapter; and to small passenger vessels, see §§ 115.900 and 176.900 of this chapter.").

exempt or authorize the vessel to conduct any other types of operations outside the scope of the COI². If the destination is in a different country, the owner or operator should provide documentation that the Port State will accept the vessel without the required international certificates. A request for an exemption or equivalency from international instruments should be submitted to the cognizant OCMI, who will forward the request to the appropriate Headquarters office for action, if required.

2. Subchapter “I” or Dual Certificated vessels (“I” and “L”). Vessels with valid international certificates typically do not require a Coast Guard exemption to participate in relief efforts. Those vessels without valid international certificates may request an exemption or equivalency in accordance with the procedures in paragraph D of this policy³.
3. Subchapter “L” vessels and existing OSVs inspected under subchapter “I” or “T”. In accordance with 46 United States Code (U.S.C.) § 2101, an Offshore Supply Vessel (OSV) is defined as a “motor vessel that regularly carries goods, supplies, individuals in addition to the crew, or equipment in support of exploration, exploitation, or production of offshore mineral or energy resources.” These vessels are not authorized to carry freight for hire or passengers when not supporting the exploration, exploitation, or production of offshore mineral or energy resources. Vessel owners or operators may request an equivalency or exemption⁴ and must submit a gap analysis as part of the request to determine which laws and regulations the vessel does not meet, for the requested route and conditions. The owner or operator may propose alternative arrangements such that an equivalent level of safety is achieved for the regulatory gaps. These requests should be submitted using the same process outlined in paragraph D of this policy letter. These requests will only be considered when a national emergency has been declared, and a federal agency has requested a specific vessel or vessel capability (e.g. shallow draft self-propelled vessel, vessels with dynamic positioning systems, etc.).
4. Hazardous Material Cargo. Vessels may only carry hazardous cargoes that are already permitted by the vessel’s COI and applicable Cargo Authority Attachment (CAA)⁵. Waivers will not typically be granted to carry hazardous cargoes outside of what is authorized by the vessel’s COI.
5. Manning. Vessels are to be manned with appropriately licensed personnel as required by their COI. OCmis may modify COI manning requirements on a case-by-case basis consistent with existing policy⁶, however, OCmis shall not reduce manning below statutory minimums found in 46 U.S.C. Subtitle II Part F. Personnel onboard must comply with Standards of Training, Certification, and Watchkeeping for Seafarers (STCW) requirements based on the nature of the voyage and employment of the vessel, if applicable.

² 74 SOLAS (20) I/4(a) (“A ship which is not normally engaged on international voyages but which, in exceptional circumstances, is required to undertake a single international voyage may be exempted by the Administration from any of the requirements of the present regulations provided that it complies with safety requirements which are adequate in the opinion of the Administration for the voyage which is to be undertaken by the ship.”).

³ 46 CFR §§ 90.05-10 (c), 91.60-25(a).

⁴ 46 CFR §§ 90.05-10 (c), 91.60-25(a); 46 CFR §§ 125.170, 133.20; 46 CFR §§ 176.920, 176.930.

⁵ See COMDTINST M16000.70 (series), Marine Safety Manual (MSM), Marine Inspection Administration, §§ A.3.H.3., A.3.H.3.b.

⁶ See generally 46 CFR §§ 2.01-5(b), 15.501; MSM, Vol. II § A.3.H.

6. Carrying additional Passengers or Persons in addition to Crew.

- **Excursion Permits:** The OCMI may issue an Excursion Permit to vessels inspected under Subchapters H, K, M, and T, authorizing the carriage of additional personnel⁷ for relief operations.
- **Persons in Addition to Crew:** The OCMI may issue an amended or temporary COI authorizing a vessel to carry additional personnel beyond what is permitted on the vessel's COI⁸ if permitted by law or regulation after reviewing the submitted gap analysis to verify the vessel has the appropriate safety and lifesaving equipment onboard.
- **Vessels using overnight accommodations:** Vessels that use overnight accommodations for persons not already permitted on the COI may request a determination by the local OCMI to ensure the arrangements are adequate through onboard inspections and/or plan review. The OCMI may approve the request using one of the means outlined in the applicable subchapter. If the OCMI does not have the authority to approve the request, it will be forwarded to the appropriate office at Coast Guard Headquarters.
- **Portable Accommodation Modules:** In some cases, an equivalency or exemption may be necessary to permit Portable Accommodation Modules (PAMs) to serve as berthing arrangements. These requests should be sent to the cognizant OCMI and should follow the requirements outlined in CG-ENG Policy Letter 01-16 CH-1.

7. Advance Notice of Arrival (ANOA). When entering U.S. ports, notifications shall be made prior to arrival in accordance with 33 CFR part 160 subpart C. When entering foreign ports, it is incumbent upon the vessel to adhere to Port State requirements.

Corydon F. Heard IV

C.F. HEARD IV
Captain, U.S. Coast Guard
Chief, Office of Commercial Vessel Compliance
By direction

⁷ See 46 CFR §§ 2.01-45; 136.245; MSM, Vol. II § A.3.H.2.

⁸ See 46 CFR §§ 2.01-40.