

U.S. Department of
Homeland Security

United States
Coast Guard



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Distribution to Coast Guard Accepted Independent Laboratories

Dear Sir/Ma'am,

The U. S. Coast Guard (USCG) has received numerous ballast water management system (BWMS) type approval applications intended for installation on U.S. flag vessels. In some of these applications, a USCG Accepted Independent Laboratory (IL) has not verified that the BWMS meets the U.S. recognized national standard for all related marine engineering and electrical engineering applications. This letter provides amplifying guidance for ILs when verifying that a BWMS meets a recognized national standard for U.S. flag vessels.

The USCG notes that as per 46 CFR 162.060-20(a)(4), manufacturers have a choice in designing their BWMS to a recognized national or international standard for all related marine engineering and electrical engineering applications. However, for type approval applications intended for installation on U.S. flag vessels, the IL should verify that the BWMS is designed and constructed according to the requirements in 46 CFR Subchapters F and J. If it is the intention of the manufacturer to seek type approval for installation on both U.S. and international vessels, the IL should verify that the BWMS meets both the recognized national and international standard. For applications where the IL verifies the design and construction to a single standard, the Marine Safety Center will consider type approval for use on vessels to which the standard is applicable.

USCG Type Approval Certificates are valid for a period of 5-years from the date set forth on the type approval certificate (46 CFR § 2.75-1). When renewal is required, the manufacturer may seek to change design and construction standards and/or the USCG may have new information indicating the previously identified system's design and construction standards need to be reviewed. It is within the USCG's discretion to:

- 1) amend a type approval certificate based on new information which was not available at the time the original type approval certificate was issued; or
- 2) require the manufacturer to submit additional information supporting a claim that the BWMS's design and construction standards meet the requirements of 46 CFR Subchapters F and J.

The USCG reiterates that the design verification is the responsibility of the IL, as required by reference (a). Please note that requesting type approval to a standard for which the system was not designed and constructed may cause significant delays in the type approval process. The USCG recommends the ILs contact the Marine Safety Center for questions relating to applicability well in advance of type approval application submission to avoid such delays.

Sincerely,



J. D. BUTWID
Commander, U. S. Coast Guard
Chief, Operating and Environmental Standards

Copy: Commanding Officer, Coast Guard Marine Safety Center