

National Offshore Safety Advisory Committee (NOSAC)

FINAL REPORT AND RECOMMENDATIONS

NOSAC Task Statement of September 13, 2023 – Recommendations for the Criteria Used to Apply the Term “Occasional Towing”

The Occasional Towing Task Statement was issued to NOSAC by the USCG on September 14, 2022. Tim Sullivan was nominated Chair and Tom Horan was nominated Co-Chair.

Background (from the Task Statement)

46 CFR §136.105(a)(5) states that Subchapter M is applicable to all U.S. flagged towing vessels except when the vessel is inspected under other subchapters and performs *occasional towing*.

The towing industry has expressed concern regarding the lack of a clear and explicit definition for the term *occasional towing*. The towing industry’s contention is that the ambiguity of the term *occasional towing* has resulted in the inconsistent implementation of Subchapter M across Officer in Charge, Marine Inspection (OCMI) Zones and has created confusion amongst vessel operators who are eager to learn what methodology the U.S. Coast Guard uses when applying such a term.

Discussion (from the Task Statement)

The U.S. Coast Guard provided the following clarification on the meaning of *occasional towing* within the Frequently Asked Questions repository for Subchapter M:

Request that the Coast Guard provide a definition of “occasional towing” as it is used in 46 CFR §136.105(a)(5), which exempts “a vessel inspected under other subchapters of this chapter that may perform “occasional towing” from Subchapter M.

“Occasional towing” is described as engaged in the “infrequent” and “irregular” act of commercial towing (assistance towing exempt). “Infrequent” describes engaged in towing a minority amount of time. “Irregular” describes towing not on an established and routinely scheduled route or operation.

Task (from the Task Statement)

Identify the parameters that should be used to determine whether a vessel inspected under subchapters other than Subchapter M or Subchapter I performs *occasional towing*.

- Take into consideration the type of service that a vessel is constructed and certified to perform.

- Provide written examples of vessel operations that the U.S. Coast Guard should consider *occasional towing*.
- Examples should account for and describe the infrequent and irregular nature of the operation. Referencing the 'Discussion' section of the Task Statement -
 - "Infrequent" describes engaged in towing a minority amount of time.
 - "Irregular" describes towing not on an established and routinely scheduled route or operation.

Plan of Action

1. Provide research and familiarization to the Subcommittee about USCG towing regulations.
2. Review the USCG National Towing Safety Advisory Committee's recommendations for Occasional Towing.
3. Identify examples of possible occasional towing activities.
4. Recruit industry participation across the 46 CFR Subchapters (vessel service types) that may be performing the occasional towing activities identified by the Subcommittee.
5. Assess the infrequent and irregular nature of the towing activity examples taking into consideration the type of service the vessel is constructed and certified to perform.

Conduct of Work

The plan of action was implemented over five Subcommittee meetings and multiple Working Group meetings. Three Working Groups were set-up for the following towing activities: oil spill response, survey, and static towing. Participants included vessel owners representing some vessel types in the respective 46 CFR Subchapters, two industry associations, and one Classification society. There were no participants from the Subchapter M towing vessel sector. See Enclosure (1) for the Subcommittee Meeting Schedule.

References

- Enclosure (1): Subcommittee Meeting Schedule
- Enclosure (2): Static Towing Assessment for Occasional Towing
- Enclosure (3): Survey Gear Towing Assessment for Occasional Towing
- Enclosure (4): Overview of USCG Towing Regulations Particular to Occasional Towing
- Enclosure (5): National Towing Safety Advisory Committee's Recommendations for Occasional Towing
- Enclosure (6): Table of towing activities identified by the Subcommittee for an assessment of occasional towing criteria

USCG Towing Regulations

In the year 2016, Subchapter M under 46 CFR (“Subchapter M”) was established to provide “safety regulations governing the inspection, standards, and safety management systems of towing vessels”.

Prior to the establishment of Subchapter M, regulations that govern safety management systems for ships and regulations that govern the stability and manning requirements for towing activities already existed. These regulations reside outside of Subchapter M, and continue to apply to vessels performing towing activities, including occasional towing.

See Enclosure (4) for the overview of USCG Towing Regulations Particular to Occasional Towing.

Identifying Occasional Towing Activities

The first three actions of the Subcommittee’s plan of action was to understand the regulations particular to the Task Statement, review the NTSAC recommendations, and identify other possible forms of occasional towing activities amongst the vessels inspected in the other Subchapters in 46 CFR, excluding Subchapters I and M.

Regarding the examples of occasional towing identified in the NTSAC report, there is a distinct difference between the two Task Statements issued to NTSAC and NOSAC. The Task Statement issued to NTSAC did not exclude Subchapter I (cargo) vessels from examples of occasional towing, whereas the NOSAC Task Statement, consistent with the regulatory exceptions of Subchapter M, excludes Subchapter I vessels from examples of occasional towing.

The NTSAC report identified the towing of survey gear and static towing as forms of towing activity that are being performed by oceanographic research vessels, seismic survey vessels, school vessels, offshore support (supply) vessels and others. To clarify, static towing is understood as one vessel being used to hold another vessel in position or on a certain heading, also referred to as a “hold-back” vessel. The Subcommittee discussed a variety of other possible examples of occasional towing activities, all of which were dismissed from assessment either because they were examples of exceptional circumstance such as an unrecoverable lifeboat being towed by its ship, or considered not to be a towing activity such as subsea, construction, or decommissioning work involving remotely operated vehicles or construction cranes. Examples of occasional towing that may arise from a national disaster or emergency response (other than oil spill) were not thought of and therefore not considered by the Subcommittee.

The towing of containment boom, skimming equipment, and other tools for purposes of emergency response and for training were assessed for occasional towing. Response to oil spills is excepted from Subchapter M by regulation 46 CFR 136.110(1)(iii). Regarding training exercises, given that most training exercises are mandated for oil spill recovery organizations on a regular basis and given that the CG Act of 2022 requires the USCG to review existing policies for exception of participation in an oil response exercise from the applicability of Subchapter M, training exercises were determined by the subcommittee not to meet the criteria for occasional towing. Also, USCG CVC-WI-032(1) “U.S. Flagged Vessels Inspected Under Multiple Subchapters” issued on June 23, 2023, includes additional guidance for these towing activities. For these reasons, the Subcommittee’s assessment of this activity is not included in the report.

The Subcommittee identified and assessed the examples of towing survey gear and static towing as possible activities of occasional towing.

See Enclosure (6) for a table of towing activities identified by the Subcommittee for an assessment of occasional towing criteria

Executive Summary for the Assessment of Static Towing as an Occasional Towing Activity

The Subcommittee and Working Group found that static towing, the use of one vessel to hold-back another vessel in order to maintain position or heading, is currently being conducted by vessels inspected under Subchapter I and vessels inspected under Subchapter I and L, both of which are excepted by regulation from inspection under Subchapter M. Historically however, prior to the establishment of Subchapter M, Subchapter L only anchor handling towing supply vessels, known as AHTSs, towed and set anchors for MODUs in shallow waters. In the future, these vessels may, on occasion, be requested to perform static towing activities. Specifically, these vessels may be requested to assist self-propelled FPSOs, drill ships, and MODUs with heading and/or position keeping during adverse weather or water current conditions.

The Subcommittee assessed the parameters of these examples of occasional towing and concluded that based on the construction, certifications, and service of an anchor handling towing supply (AHTS) vessel, and the irregular, infrequent, and inherently less risky nature of static towing, the USCG should continue regulating static towing activities conducted by AHTSs under the discretion of the OCMI (and in consultation with the D8 OCS OCMI for operations in the Gulf of Mexico). The static towing activities described above are generally not predictable, are not constant, and are lower in risk. Static towing activities are rarely performed by an AHTS inspected under Subchapter L and should be considered occasional towing. AHTSs that perform these activities comply with IACS Classification Society towing rules, operate under a safety management system, and should comply with applicable towing regulations. See Enclosure (2) for the full assessment of static towing activities by an anchor handling towing supply vessel.

Executive Summary for the Assessment of Towing Survey Gear as an Occasional Towing Activity

The Subcommittee and Working Group found that the towing of survey gear is being conducted by offshore supply vessels inspected under Subchapter L, small passenger vessels inspected under Subchapter T, and oceanographic research vessels inspected under Subchapter U. The population of vessels conducting these activities is limited, which was evidenced by the level of industry participation in the Task Statement. There was no participation in the Subcommittee from oceanographic research vessels inspected under Subchapter U or small passenger vessels inspected under Subchapter T for the towing of survey gear.

Several survey vessels are currently being constructed and delivered under Subchapter T which have the necessary stability and are fitted with an A-frame for the launching and recovery of towed instrumentation. There are some, perhaps approximately 20 Subchapter L only vessels,

that may be currently fitted to conduct survey towing activities. For each of these vessel categories, the towing of survey gear is not the only mission or capability of the vessels.

The Subcommittee did assess the parameters of a Subchapter L only OSV for occasional towing and concluded that OSVs are constructed, certified, subjected to adequate inspection and audit schemes, and capable of performing multiple missions for the demands of offshore energy exploration, including the inherently less risky nature of towing objects for survey activities. A lease holder's activity of surveying their lease area is not routine in the sense that surveying is conducted early in the exploration or planning phase for a limited term, and is not part of an established ongoing "transportation" schedule. The duration of a survey on a lease could be anywhere from a few weeks to two years. Given the infrequent demand for lease surveys, survey gear towing activity represents a small portion of the overall service intent and history of an OSV.

The USCG should not set parameters to determine whether or not the towing of survey gear offshore by an inspected vessel qualifies as occasional towing. The USCG should continue regulating the towing of survey gear (and other objects) under the discretion of the OCMI, as the application of 'all' towing regulations to the towing of 'any' object is not practical. See Enclosure (3) for the full assessment of survey gear towing activities by an offshore supply vessel.



Tim Sullivan, Chair

Tom Horan, Co-Chair

Subcommittee Meeting Schedule

1 st Meeting	November 28, 2022	Overview of regulations; NTSAC Report review
2 nd Meeting	January 31, 2023	Discuss possible examples of occasional towing
3 rd Meeting	March 10, 2023	Review list of possible examples of occasional towing
4 th Meeting	May 2, 2023	Subchapter T oil spill recovery vessel assessment
5 th Meeting	July 24, 2023	Subchapter L static and survey towing assessment
6 th Meeting	September 12, 2023	Finalize Task Statement Report

Static Towing Assessment for Occasional Towing

The Subcommittee and Working Group found that static towing, the use of one vessel to hold-back another vessel in order to maintain position or heading, is currently being conducted by vessels inspected under Subchapter I and vessels inspected under Subchapter I and L, both of which are excepted from inspection under Subchapter M. Historically however, prior to Subchapter M, Subchapter L only anchor handling towing supply (“AHTS”) vessels towed and set anchors for MODUs in shallow waters. The demand for this activity is reportedly low given MODUs primarily operate in waters too deep for anchor setting. At some point in time, these vessels may re-enter into service and on occasion, maybe requested to perform certain forms of static towing. Specifically, in the future, an AHTS rated to handle anchors and inspected under Subchapter L (only), may be requested to assist self-propelled FPSOs, drill ships, and MODUs with heading and or position keeping during adverse weather or water current conditions. As such, the Subcommittee and Working Group assessed these static towing examples to identify occasional towing parameters taking into consideration the type of service that this vessel is constructed and certified to perform.

Nature of static towing. The Subcommittee provided the following elements to describe the nature of static towing:

- Loads are moderate to heavy when assisting FPSOs, drill ships, and MODUs.
 - Vessels associated with an FPSO are tandemly moored and are not underway
 - The vessel being assisted is self-propelled and maybe fitted with a dynamic positioning system
 - Towline pull criteria, bollard strength, towline gear, and intact stability are calculated and approved by an IACS Classification Society
- Length of a static tow wire is generally several hundred feet
- Speed over the ground of a static tow is basically stationary, less than 1 knot
- Make-up of static tows are astern, not alongside or pushed ahead
- Risk of static towing is lower in comparison to conventional towing
 - hold-back activity involves assisting self-propelled vessels offshore, some of which are moored
 - occurs in a limited geographic area
 - does not involve inland navigation

The service of an Offshore Supply Vessel (“OSV”) is defined as a 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. It is not uncommon for a charterer to request an OSV to provide services to support a wide variety of activities offshore which may include geotechnical / seismic support, anchor handling, hold-back, offshore worker transportation, flotel service, deck cargo support, bulk transfer of drilling fluids such as fuel / dry bulk / water / other hazardous substances, deploying and retrieving remotely operated vehicles, well intervention / stimulation, subsea construction in the form of installation or removal of tree / jumper / pipeline / well flowback / pipeline flush / pipeline flowback, and decommissioning.

The certification of an AHTS vessel inspected under Subchapter L only, that may be asked to perform static towing activities is described as follows:

- USCG. Inspected under Subchapter L.
- Load Line. Certificated for Load Line permitting operation beyond the boundary line.
- Classification Society. Vessels are greater than 500 GT ITC and certificated with an IACS Classification Society.
- Safety Management System. Vessels are operating under a safety management system that includes a risk assessment and procedures to carry out the safe operations of the vessel.

The construction of an AHTS vessel inspected under Subchapter L only, that may be asked to perform static towing activities is described as follows:

Maneuverability

Anchor handling OSVs are typically constructed and fitted with dynamic positioning (“DP”) systems rated to the equivalency of an IACS Classification Society’s DP1 rating, most are rated DP2, both of which provide increased maneuverability and propulsion redundancy if needed.

Arrangements

New towing vessels must meet the ABS rules for Building and Classing Marine Vessels. Anchor handling OSVs are required to satisfy IACS Classification Society vessel design requirements, which may go as far as qualifying for an IACS Classification notation for towing.

Stability

OSVs performing any towing activity must meet the same stability requirements in Subchapter S that a towing vessel inspected under Subchapter M meets, with the exception of Part 174, Subpart E – tugboats and towboats intact stability

- Same stability requirements -
 - Part 170 – applicable to all vessels
 - Part 173, Subpart E – towline pull criteria
 - Part 174, Subpart G – offshore supply vessels
- Exception –
 - Part 174, Subpart E – applicable to tugboats and towboats inspected under Subchapter I

For any towing activities, special attention should be made in evaluating compliance with 46 CFR Part 173, Subpart E towline pull criteria, and 46 CFR Part 174, Subpart E intact stability requirements.

OSVs subject to IACS Classification Society rules performing this towing activity are required to satisfy IACS Classification Society stability requirements.

Enclosure (2) to NOSAC Final Report for Occasional Towing Task Statement

An OSV's safety management system risk assessments, regulatory oversight, and IACS Classification Society oversight ensures their towing activity will not exceed their stability criteria under Parts 170, 173, and 174.

Marine Engineering and Electrical Engineering Design

OSVs subject to IACS Classification Society rules performing these towing activities are required to satisfy Classification towing gear requirements.

OSVs performing static towing meet the same marine engineering (Subchapter F) and electrical engineering (Subchapter J) design criteria as vessels inspected under Subchapter M with the exception of towing machinery requirements under part 143.560 of Subchapter M

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- Towing bitt crossbar
- Towing machinery suitable for intended purpose
- Warning sign for uncontrolled release
- Procedures for routine examination and maintenance

For any towing activity, special attention should be made in evaluating the towing machinery requirements under 46 CFR 143.560.

An OSV's safety management system risk assessment, regulatory oversight, and IACS Classification Society oversight ensures adequate installation and operating procedures for towing machinery associated with these towing activities.

Lifesaving Appliances

Lifesaving appliance requirements for OSVs inspected under Subchapter L provide equivalent levels of protection for vessels inspected under Subchapter M

Firefighting Protection

For towing purposes, the fire protection appliance requirements for OSVs inspected under Subchapter L provide equivalent levels of protection for vessels inspected under Subchapter M. The following three fire protection requirements under Subchapter M differ with Subchapter L, but they have no bearing or relevance to towing activities –

- 142.325(c)(d) Fire pumps, fire mains, and fire hoses. The fire main must have a sufficient number of fire hydrants with attached hose to allow a stream of water to reach any part of the machinery space using a single length of fire hose. The hose must be a lined commercial fire hose 15 meters (50 feet) in length, at least 40 millimeters (1.5 inches) I diameter
- 142.227 Fire axe. Each towing vessel must be equipped with at least one fire axe that is readily accessible for use from the exterior of the vessel
- 142.226 Firefighter's outfit. Each towing vessel 79 feet or more in length operation on oceans and coastwise routes that does not have an installed fixed fire-extinguishing

system must have at least two firefighter's outfits and two self-contained breathing apparatus

Infrequent Activity of Static Towing *(minority amount of time)*

The amount of time an AHTS is providing static tow service, assisting self-propelled and DP capable FPSOs and drill ships with heading and or position keeping in adverse weather or water current conditions, is seasonal, not necessarily constant, and a minority of the time.

Irregular Activity of Static Towing *(not on an established and routinely scheduled route or operation)*

The service for assisting self-propelled and DP capable FPSOs and drill ships with heading and or position keeping in adverse weather or water current conditions is unscheduled and is only provided as needed if/when an offshore water current or weather event impedes the position-keeping capability or heading aspect needed to carry-out a specific operation.

Recommendation for Static Towing Activities

The USCG should continue regulating static towing activities conducted by AHTSs under the discretion of the OCMLs (and in consultation with the D8 OCS OCMI for operations in the Gulf of Mexico). The static towing activities described above are generally not predictable, are not constant, and are lower in risk. Static towing activities are rarely performed by an AHTS inspected under Subchapter L and should be considered occasional towing. AHTSs that perform these activities comply with IACS Classification Society towing rules, operate under a safety management system, and should comply with all applicable towing regulations outside of Subchapter M.

Survey Towing Assessment for Occasional Towing

The Subcommittee and Working Group assessed offshore supply vessels inspected under Subchapter L (only) towing survey gear (sonar array, instruments, etc.) to identify occasional towing parameters taking into consideration the type of service that this vessel is constructed and certified to perform.

Nature of survey towing. The subcommittee provided the following elements to describe the nature of towing survey gear:

- Load of survey gear is relatively light in comparison to a “transportation” tow of a commodity. Survey gear is comprised of an object(s), not a barge(s) or a vessel(s). A towing package in the form of a winch, typically for the size of 3/8 inch diameter cable, and sometimes an A-frame.
- Length of a survey gear tow can vary – several hundred feet up to several thousand feet
- Speed over the ground of survey gear tows are generally 6 knots or less
- Make-up of survey gear tows are astern, not alongside or pushed ahead
- Risk of towing objects offshore in lieu of towing vessels, barges, or hazardous materials is significantly less

The service of an Offshore Supply Vessel (“OSV”) is defined as a 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. It is not uncommon for a charterer to retrofit an OSV with changes to its equipment or accommodations in order to support a wide variety of activities offshore which may include geotechnical / seismic support, anchor handling, pull-back, offshore worker transportation, flotel service, deck cargo support, bulk transfer of drilling fluids such as fuel / dry bulk / water / other hazardous substances, deploying and retrieving remotely operated vehicles, well intervention / stimulation, subsea construction in the form of installation or removal of tree / jumper / pipeline / well flowback / pipeline flush / pipeline flowback, and decommissioning.

The certification of a Subchapter L only vessel that may tow survey gear is described as follows:

- USCG. Inspected under Subchapter L.
- Load Line. Certificated for Load Line permitting operation beyond the boundary line.
- Classification Society. Depending on the tonnage of the OSV, the OSV may or may not be certified by a Classification Society (less than 500 GT ITC may not be)
- Safety Management System. OSVs conducting surveys for lease holders, either by regulation or by conformance with a lease holders safety management requirements, are operating under a safety management system that includes a risk assessment and procedures to carryout the safe operations of the vessel.

The construction of a Subchapter L only vessel that may tow survey gear is described as follows:

Maneuverability.

Although dynamic positioning (“DP”) systems generally are not engaged during survey towing activities, OSVs are typically constructed and fitted with DP systems which provides increased maneuverability and propulsion redundancy if needed.

Stability

OSVs performing any towing activity must meet the same stability requirements in Subchapter S that a towing vessel inspected under Subchapter M meets, with the exception of Part 174, Subpart E – tugboats and towboats intact stability

- Same stability requirements in Subchapter S -
 - Part 170 – applicable to all vessels
 - Part 173, Subpart E – towline pull criteria
 - Part 174, Subpart G – offshore supply vessels
- Exception –
 - Part 174, Subpart E – intact stability requirements applicable to tugboats and towboats inspected under Subchapter I

For any towing activities, special attention should be made in evaluating compliance with 46 CFR Part 173, Subpart E towline pull criteria, and 46 CFR Part 174, Subpart E intact stability requirements. For OSVs, the light load of survey gear is generally insignificant in comparison to the size of the vessel, thus the application of towline pull criteria and the intact stability requirements of tugboats and towboats are not warranted.

If a vessel is required to have a stability document, it must be used and it must account for the vessel’s operations. If a vessel is not required to have a stability document, the vessel should have a satisfactory stability assessment by means of giving due consideration to each item that impacts a vessel’s stability characteristics which include, but are not limited to, the form, arrangement, construction, number of decks, route, and operations.

An OSV’s safety management system risk assessments and regulatory oversight ensures their towing activity will not exceed their stability criteria under Parts 170, 173, and 174.

Marine Engineering and Electrical Engineering Design

OSVs performing survey gear towing meet the same marine engineering (Subchapter F) and electrical engineering (Subchapter J) design criteria as vessels inspected under Subchapter M with the exception of towing machinery requirements under part 143.560 of Subchapter M –

- Towing bitt crossbar
- Towing machinery suitable for intended purpose

Enclosure (3) to NOSAC Final Report for Occasional Towing Task Statement

- Warning sign for uncontrolled release
- Procedures for routine examination and maintenance

For any towing activity, special attention should be made in evaluating the towing machinery requirements under 46 CFR 143.560.

Under 33 CFR 96 Subpart B, the USCG requires vessels 500 GT ITC or greater to operate under a safety management system. Vessels less than 500 GT ITC that engage in offshore energy exploration typically operate under a safety management system. An OSV's safety management system risk assessment and regulatory oversight ensures adequate installation and operating procedures for survey gear towing machinery.

Lifesaving Appliances

Lifesaving appliance requirements for OSVs inspected under Subchapter L provide equivalent levels of protection for vessels inspected under Subchapter M.

Firefighting Protection

For towing purposes, the fire protection appliance requirements for OSVs inspected under Subchapter L provide equivalent levels of protection for vessels inspected under Subchapter M. The following three fire protection requirements under Subchapter M differ with Subchapter L, but they have no bearing or relevance to towing activities –

- 142.325(c)(d) Fire pumps, fire mains, and fire hoses. The fire main must have a sufficient number of fire hydrants with attached hose to allow a stream of water to reach any part of the machinery space using a single length of fire hose. The hose must be a lined commercial fire hose 15 meters (50 feet) in length, at least 40 millimeters (1.5 inches) I diameter
- 142.227 Fire axe. Each towing vessel must be equipped with at least one fire axe that is readily accessible for use from the exterior of the vessel
- 142.226 Firefighter's outfit. Each towing vessel 79 feet or more in length operation on oceans and coastwise routes that does not have an installed fixed fire-extinguishing system must have at least two firefighter's outfits and two self-contained breathing apparatus

Infrequent Activity of Survey Towing (*minority amount of time*)

Generally speaking, the number of times an offshore mineral or energy resource company or entity requires their lease to be surveyed is not frequent, usually conducted during the exploration phase. Given the infrequent demand for lease surveys, survey gear towing activity represents a small portion of the overall service intent and history of an OSV.

Irregular Activity of Survey Towing (*not on an established and routinely scheduled route or operation*)

A lease holder's activity of surveying their lease area is not routine in the sense that surveying is conducted early in the exploration or planning phase for a limited term, and is not part of an established ongoing "transportation" schedule. The duration of a survey on a lease area could be anywhere from a few weeks to two years.

Sometimes survey gear towing activities are frequent and regular, and sometimes they are not.

Survey gear towing activities are being conducted by vessels inspected under Subchapters L/I, Subchapter L only, Subchapter T only. Survey gear towing activities have been conducted by uninspected oceanographic research vessels that have surrendered their COI.

Recommendation for Survey Towing Activity

The USCG should not set parameters to determine whether or not the towing of survey gear by an inspected vessel qualifies as occasional towing. The USCG should continue regulating the towing of survey gear (and other objects), a considerably lower risk towing activity, under the discretion of the OCMLs, as the application of 'all' towing regulations to the towing of 'any' object is not practical. For example, U.S. flag vessels dedicated to surveying for the offshore wind industry are currently being constructed and delivered for inspection under Subchapter T with the necessary stability and with an A-frame for the launching and recovery of towed instrumentation.

Overview of USCG Towing Regulations Particular to Occasional Towing

Regulatory Overview

- **Tow definition**
- **Towing Vessel definition**
- **Occasional Towing description**
- **Subchapter M (Towing) Exceptions**
- **Occasional Towing Manning**
- **Stability**

Tow Definition - 46 CFR 136.110 –

Tow - means the barge(s), vessel(s), or objects(s) being pulled, pushed, or hauled alongside a towing vessel

Towing Vessel Definition - 46 CFR 136.110 –

Towing Vessel - means a commercial vessel engaged in or intending to engage in the service of pulling, pushing, or hauling alongside, or any combination of pulling, pushing, or hauling alongside

Occasional Towing Description –

USCG describes “occasional towing”, as it is used in 46 CFR 136.105(a)(5), as engaged in the “infrequent” and “irregular” act of commercial towing (assistance towing exempt)

- “Infrequent” describes engaged in towing a minority amount of time
- “Irregular” describes towing not on an established and routinely scheduled route or operation

Subchapter M "Towing" Exceptions – 46 CFR 136.105(a)

Subchapter M is applicable to all U.S.-flag towing vessels as defined in [§ 136.110](#) engaged in pushing, pulling, or hauling alongside, except -

- (1) A vessel less than 26 feet (7.92 meters) in length measured from end to end over the deck (excluding the sheer), unless that vessel is pushing, pulling, or hauling a barge that is carrying oil or hazardous material in bulk;
- (2) A vessel engaged in one or more of the following:
 - (i) Assistance towing as defined in [§ 136.110](#); means towing a disabled vessel for consideration as defined in 46 USC 2101. Disabled as defined in [§ 136.110](#) vessel means a vessel that needs assistance, whether docked, moored, anchored, aground, adrift, or under way, but does not mean a barge or any other vessel not regularly operated under its own power.
 - (ii) Towing recreational vessels for salvage; or
 - (iii) Transporting or assisting the navigation of recreational vessels within and between marinas and marina facilities, within a limited geographic area, as determined by the local Captain of the Port (COTP);
- (3) A workboat operating exclusively within a worksite and performing intermittent towing within the worksite;
- (4) A seagoing towing vessel of 300 gross tons or more subject to the provisions of subchapter I of this chapter;
- (5) A vessel inspected under other subchapters of this chapter that may perform occasional towing;
- (6) A public vessel as defined in [46 U.S.C. 2101](#);
- (7) A vessel that has surrendered its COI and is laid up, dismantled, or otherwise out of service; and
- (8) A propulsion unit used for the purpose of propelling or controlling the direction of a barge where the unit is controlled from the barge, is not normally manned, and is not utilized as an independent vessel.

Manning Requirements for Towing – 46 CFR 15.535 –

Manning requirements for towing are not contained in the vessel specific subchapters, they reside in Subchapter B –

Title 46	Shipping
▼ Chapter I	Coast Guard, Department of Homeland Security
▼ Subchapter B	Merchant Marine Officers and Seamen
▼ Part 15	Manning Requirements
▼ Subpart E	Manning Requirements; Inspected Vessels
§ 15.501	Certificate of inspection.
§ 15.505	Changes in the certificate of inspection.
§ 15.510	Right of appeal.
§ 15.515	Compliance with certificate of inspection.
§ 15.520	Mobile offshore drilling units (MODUs).
§ 15.525	Additional manning requirements for tank vessels.
§ 15.530	Large passenger vessels.
§ 15.535	Towing vessels.

(a) **Applicability.** Except as provided in this paragraph (a), the requirements in this section apply to a towing vessel subject to subchapter M of this chapter. Vessels subject to this section must also meet the requirements in § 15.515(c). A towing vessel at least 8 meters (26 feet) in length, measured from end to end over the deck (excluding sheer), that is not subject to subchapter M must meet the requirements in paragraph (b) of this section if it is -

- (1) A seagoing towing vessel of 300 gross tons or more subject to the provisions of subchapter I of this chapter;
- (2) A vessel inspected under other subchapters of this chapter that may perform occasional towing; or
- (3) A public vessel as defined in 46 U.S.C. 2101.

(b) **Towing vessels 8 meters or more in length.** Every towing vessel of at least 8 meters (26 feet) in length, measured from end to end over the deck (excluding sheer), must be under the direction and control of a person holding a MMC endorsed as master or mate (pilot) of towing vessels or as master or mate of vessels of greater than 200 gross register tons, holding a completed Towing Officer Assessment Record signed by a designated examiner indicating that the officer is proficient in the operation of towing vessels upon the appropriate route.

Subchapter S - Subdivision and Stability

OSVs performing any towing activity must meet the same stability requirements in Subchapter S that a towing vessel inspected under Subchapter M meets, with the exception of Part 174, Subpart E – tugboats and towboats intact stability

- Same stability requirements -
 - Part 170 – applicable to all vessels
 - Part 173, Subpart E – towline pull criteria
 - Part 174, Subpart G – offshore supply vessels
- Exception –
 - Part 174, Subpart E – applicable to tugboats and towboats inspected under Subchapter I

NTSAC Subcommittee Task 21-01 (Occasional Towing)

June 15, 2022

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Subj: National Towing Safety Advisory Committee (NTSAC) Task 21-01 Final Report -
Recommendations for the Criteria Used to Apply the Term "Occasional Towing" Regarding

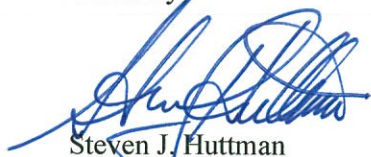
Dear CAPT Butwid,

I am writing today to forward the final report and recommendations of the National Towing Safety Advisory Committee for Task Statement #21-01 Occasional Towing. During the spring 2022 NTSAC meeting held virtually via Zoom on June 14, 2022, the Committee unanimously approved the enclosed report and recommendations.

The Subcommittee Chair Ms. Laura Wilcox, Vice Chair Mr. Eric Johansson, and the twenty-one subcommittee members worked very diligently to prepare a comprehensive report, that includes several recommendations addressing the issue of Occasional Towing.

The members of the National Towing Safety Advisory Committee appreciate the support and cooperation of the U. S. Coast Guard participating and assisting the subcommittee with this Task. We are grateful for the chance to provide to the Coast Guard, the thoughtful advice and recommendations from the Towing Industry as the Coast Guard conducts its regulatory oversight. Should you have any questions regarding the final report or the recommendations, please do not hesitate to call or email.

Sincerely,



Steven J. Huttman
Chairperson, National Towing Safety Advisory Committee

Encl: (1) Final Report – NTSAC Task 21-01 – Occasional Towing

cc: Ms. Laura Wilcox, Subcommittee Chair
Mr. Eric Johansson, Subcommittee Vice Chair
Mr. Matthew Layman - Designated Federal Official – National Towing Safety Advisory Committee

NTSAC Subcommittee Task 21-01 (Occasional Towing)



**NATIONAL TOWING SAFETY ADVISORY COMMITTEE
(NTSAC)**

TASK 21-01

**Recommendations for the Criteria Used to Apply the Term
“Occasional Towing”**

(Short Title – Occasional Towing)

Final Report and Recommendations

Approved June 14, 2022
NTSAC Spring Meeting

NTSAC Subcommittee Task 21-01 (Occasional Towing)

NATIONAL TOWING SAFETY ADVISORY COMMITTEE

May 31, 2022

To: National Towing Safety Advisory Committee

From: Laura Wilcox, Chair
Eric Johansson, Co-Chair

RE: Task 21-01 Recommendations for the Criteria Used to Apply the Term “Occasional Towing”

At the March 10, 2020, Towing Safety Advisory Intersessional Committee meeting a subcommittee was tasked with providing review of and recommendations (“Recommendations for the Criteria Used to Apply the Term “Occasional Towing”).

Laura Wilcox was nominated as Chair and Eric Johansson was nominated as Co-Chair of this Subcommittee. Both nominations were approved by TSAC members without dissent. A subcommittee was formed, and work progressed through the end of 2020.

Due to the re-structuring of the Committee and the subsequent establishment of the National Towing Safety Advisory Committee (NTSAC), work on this subcommittee was paused until the inaugural meeting of NTSAC on December 7, 2021. At the inaugural NTSAC meeting, this task was reintroduced as Task 21-01 with the same title. Ms. Wilcox and Mr. Johansson were re-nominated to continue as chair and co-chair of the subcommittee.

Subcommittee participants include members of NTSAC, industry, and Government Agencies. A complete list of participants is attached as Enclosure (1) to this report.

Respectfully Submitted,

Laura Wilcox,
Task 21-01 Subcommittee Chair

Encl: (1) NTSAC Representatives & Subcommittee Participants
(2) Task Statement 21-01

NTSAC Subcommittee Task 21-01 (Occasional Towing)

BACKGROUND AND APPROACH:

The Towing Safety Advisory Committee has previously made recommendations to the U. S. Coast Guard (USCG) regarding the scope and applicability of 46 C.F.R subchapter M certification for towing vessels. Using the past reports from TSAC regarding Subchapter M and a gap analysis of Subchapter M and other subchapters of 46 C.F.R., this subcommittee worked to determine an appropriate definition of “occasional towing” as it applies to vessels that are certificated under other subchapters. This analysis keeps the safety of mariners, vessels, and the environment at the forefront of any recommendation.

PLAN OF ACTION (POA)

1. Gather and review past TSAC recommendations pertaining to towing safety/operations.
2. Analyze risk factors related to towing safety and operations and the portions of 46 C.F.R. that attempt to mitigate such risks.
3. Produce a gap analysis between Subchapter M and other subchapters as related to towing risks.
4. Analyze current trends in “occasional towing” being undertaken by other segments of the maritime industry.
5. Determine if all towing operations can safely be undertaken by non-Subchapter M certificated vessels.
6. Determine what towing operations can safely be undertaken by non-Subchapter M certificated vessels if the answer to step 5 above is “No”.
7. Determine how often a non-Subchapter M certificated inspected vessel should be permitted to undertake towing operations without a certificate of inspection under Subchapter M.
8. Present finding and recommendations to NTSAC Members and solicit feedback.
9. Submit Final Report at the NTSAC Spring 2022 meeting.

ACTION

1. Task Chair Laura Wilcox was nominated by NTSAC.
2. Eric Johansson appointed Co-Chair.
3. Committee consists of broad industry representatives from the towing industry, offshore supply industry, regulatory bodies, classification societies, and others.
4. Teleconference Meetings were held on the following dates; August 28, 2020; September 15, 2020; November 13, 2020; November 19, 2020; January 21, 2022; and May 31, 2022.

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5. Reviewed past TSAC recommendations.
6. Developed a gap analysis to show the differences between various subchapters with regards to regulations on safety, stability, safety management systems, and equipment maintenance.
7. Procured feedback from subcommittee members along with a position letter from OMSA to draft an interim report.
8. Draft Report submitted for consideration to TSAC at the October, 2020 teleconference.
9. Re-formation of subcommittee after inaugural meeting of the National Towing Safety Advisory Committee.
10. Review of past subcommittee work by new members of NTSAC, invitation for new members for input and recommendations.
11. Final Report and Recommendations presented for consideration by National Towing Safety Advisory Committee in June 2022 for a final vote.

SUMMARY OF COMMITTEE TASK 20-01

1. Subcommittee held meetings on August 28, 2020 and September 15, 2020 to review current Task 20-01 and past TSAC Tasks 16-01, 14-01, 13-02, 13-03, 13-06, 13-10, 12-01, and 12-02.
2. Risk Factors were discussed and included personnel (qualifications, experience, and manning), Safety Management Systems, intact stability, towing gear selection and rigging, structural fittings, vessel safety, crew safety, and navigation safety
3. The Committee all agreed as follows:
 - a. Vessels engaged in towing should be under the command of qualified deck officers (Towing Endorsement) and engine officers and crewed with appropriate level of AB's as per Subchapter B.
 - b. Towing Safety Management System (TSMS) is critical to safe operations.
 - c. Vessel stability calculations to include point of tow and towing stability.
 - d. All crew members working on deck don lifesaving gear as per Subchapter M.
 - e. Towing points must be foundationally sound and inspected.
 - f. Tow Gear must be tracked and documented to ensure quality and integrity.
 - g. Towing Arrangements must be reviewed and approved.
 - h. Emergency Towing arrangements must be reviewed and approved.
4. Additional information was sought from the USCG Technical Representative about the reasoning behind the inclusion of the "occasional towing" exemption in Subchapter M. The answer from USCG was that an individual case of a towboat on Western Rivers was permitted to tow occasionally despite not being able to pass an

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Uninspected Towing Vessel safety inspection. The subcommittee agrees that such a case would not be permitted under “occasional towing” as currently written in Subchapter M and is therefore a moot point.

5. The gap analysis of inspected vessels and Inspected Towing Vessels shows that standards between subchapters vary widely and thus require detailed analysis of each subchapter of 46 C.F.R.. This subcommittee felt that such an analysis was beyond the scope of the current tasking and was better undertaken by the U. S. Coast Guard.
6. The USCG, or any other government or non-government organization, has not collected any data regarding occasional towing. Segments of the Maritime Industry do currently engage in forms of towing that are not traditionally thought of as “towing”. Examples include the towing of survey gear and “Static Towing”, which the offshore industry defines as one vessel being used to hold another vessel in position or on a certain heading. 46 C.F.R. § 136.110 defines towing vessel as *“a commercial vessel engaged in or intending to engage in the service of pulling, pushing, or hauling alongside, or any combination of pulling, pushing, or hauling alongside”* therefore, both the towing of survey gear and Static Towing are considered towing under this regulation. However, the Coast Guard does not currently appear to restrict these types of operations when performed by oceanographic research vessels, seismic survey vessels, school vessels, offshore support vessels, and others. The status, inspected, uninspected, or Class of vessels acting as towing vessels in the towing of survey gear or performing “Static Towing” is unknown.
7. In reviewing comparable regulations, several members of the subcommittee commented on the current policy by the USCG of granting permits for vessels to temporarily waive Load Line requirements or for one-time permits for excursion parties on non-passenger vessels. The general consensus of the subcommittee was that these types of one-time permits were in-line with the intent of the “occasional towing” exemption. The point at which the “occasional towing” exemption departs from these long-standing permits is in Coast Guard oversight and tracking of such permits. Currently, the Coast Guard does not track which vessels are operating under an “occasional towing” exemption or how often these vessels operate. In short, an OCMI has no centralized way of knowing if a certain vessel is doing work that is actually “occasional” or if that vessel is moving from one OCMI zone to another doing constant towing operations but skirting the regulations by claiming “occasional”.
8. In keeping with the current use of “occasional” permits, the subcommittee agrees that the parameters used by the Coast Guard in issuing Load Line exemptions, excursion permits, permits to proceed, or other dispensations outside of a vessel’s normal scope of work should be consistent with Subchapter M exemptions. The Coast Guard should work with the vessel owner or operator to ensure that compliance with the intent of Subchapter M is adhered to by making pre-voyage inspections and ensuring that voyage and tow planning is adequate for the type of tow and expected route.

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9. The type of known “occasional” work that was presented by various members of the subcommittee spanned a range from Offshore supply vessels (OSV) who were providing “static tows” to offshore assets to landing craft towing barges to reposition construction equipment from one work area to another.

DEFINITIONS

1. *Excursion party* means a temporary operation not permitted by the vessel's COI. It is typically recreational in nature and one day or less in duration. It is given for one voyage and can be applied for no more than four times in a 12-month period (46 C.F.R. § 26.03-6).
2. *Load Line Exemption* means an exemption from typical load line requirements given by the Commandant of the Coast Guard to a vessel. It is typically given for a one-time relocation of a vessel, without cargo or passengers, between two specific ports when that vessel does not normally engage in voyages that would require a Load Line Certificate. The exemption is given only if the vessel complies with the safety measures necessary for the voyage to be undertaken. CG-543 Policy Letter 10-01, Use of Single Voyage Load Line Authorizations, states the criteria and process for OCMI's to follow when issuing an authorization for Load Line Exemption.
3. *Officer in Charge, Marine Inspection* or *OCMI* means an officer of the Coast Guard designated as such by the Coast Guard and who, under the direction of the Coast Guard District Commander, is in charge of a marine inspection zone, described in 33 C.F.R. Part 3, for the performance of duties with respect to the inspection, enforcement, and administration of vessel safety and navigation laws and regulations. The “cognizant OCMI” is the OCMI who has immediate jurisdiction over a vessel for the purpose of performing these duties.
4. *Policy* means a specific statement of principles or a guiding philosophy that demonstrates a clear commitment by management, or a statement of values or intentions that provide a basis for consistent decision making.
5. *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.
6. *Tow* means the barge(s), vessel(s), or object(s) being pulled, pushed, or hauled alongside a towing vessel.
7. *Towing vessel* means a commercial vessel engaged in or intending to engage in the service of pulling, pushing, or hauling alongside, or any combination of pulling, pushing, or hauling alongside.
8. *Towing Safety Management System* or *TSMS* means an SMS for a towing vessel as described in part 138 of this subchapter.
9. *Workboat* means a vessel that pushes, pulls, or hauls alongside within a worksite.

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RECOMMENDATIONS

The subcommittee makes the following recommendations to the U. S. Coast Guard:

1. Because of the lack of compelling evidence of the need for an exemption for “occasional” towing, as well as the lack of a similar exemption within other subchapters of 46 C.F.R., and because a clear path already exists for vessel owners and operators to request temporary or one-time permits for non-standard operation, and because the Coast Guard neglected to implement a standard protocol for the issuance and tracking of such occasional exemptions; the subcommittee *most strongly* recommends that the term “occasional” and the exemption for vessels engaged in “occasional” towing be struck from Subchapter M.
2. If the Coast Guard finds that it would like to retain the exemption for “occasional towing”, the subcommittee *highly* recommends that the following criteria are established for the issuance, inspection, and tracking of vessels requesting an exemption from Subchapter M under the “occasional towing” definition.
 - a. The subcommittee agrees that the occasional towing exemption should be handled by the Coast Guard in the same manner and with policies that parallel other operational exemptions- with the oversight of the local OCMI, through published guidance in the Marine Safety Manuals or other official policy, and with recordkeeping and the ability to track at the District and National levels by way of permits and entries in MISLE.
 - b. Occasional permits for exemption should be issued no more than twice a year to any vessel. We recognize that without a tracking system currently in place, there is no way to know how often this exemption is being utilized. After a period of time, the USCG should review the data on occasional towing and may increase or decrease the number of acceptable annual occurrences based on their findings of safety data with regards to occasional towing activities.
 - c. Occasional permits should be given for a *specific* tow activity and for a specified route and duration. The local OCMI should provide voyage-specific oversight and inspection of the towing plan, tow arrangement, credentials of towing officers involved, provenance and certification of towing gear, and the safety management plan that ensures additional safety criteria as typically required by Subchapter M is adhered to.
 - d. Typical towing activities that should be permitted as “occasional” towing should be limited to tows that are not regularly occurring parts of a vessel’s normal business.
3. Examples of vessel operations that the U. S. Coast Guard should consider *occasional towing* are those in which vessels that are not certificated under Subchapter M, but are certificated under other subchapters, engage in pushing, pulling, or hauling

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alongside. These vessel operations are those normally undertaken by towing vessels as defined in 46 C.F.R. Part 136.

These activities could be undertaken by many different types of vessels. The subcommittee has not done an in-depth review of the suitability of any particular vessel for any particular type of towing activity. We believe it is the responsibility of the OCMI to determine if a particular vessel is suitable for a particular towing job based the following parameters:

- a. Current Certificate of Inspection (COI) under another subchapter (D, H, I, K, L, R, T only)
 - b. Outstanding deficiencies
 - c. Past safety history
 - d. Manning and credentials of crew (Master and Mate of Towing)
 - e. Performance capabilities of the vessel based on:
 - (1) Design
 - (2) Scantlings
 - (3) Stability
 - (4) Subdivision
 - (5) Propulsion
 - (6) Speed
 - (7) Operating modes
 - (8) Maneuverability
 - (9) Seaworthiness for the proposed route
 - (10) Suitability of towing fixtures and bitts
4. It is also important to this committee that the Coast Guard pay particular attention to the availability of Subchapter M certificated vessels to carry out any towing activity that is proposed as an occasional tow. We recognize that the costs associated with certificating a vessel to Subchapter M standards can be significant. We do not believe that allowing unrestricted towing activities to be undertaken by non-Subchapter M vessels is fair and right to owners and operators of Subchapter M certificated vessels. We also recognize that Subchapter M implements more specific safety measures than most other subchapters and voice our concern that safety compromises are not made in the issuance of occasional towing permits.
5. In reviewing towing activities that could be undertaken on an occasional basis, we must reiterate Federal Code that any vessel purpose-built as a towing vessel must be certificated under Subchapter M or Subchapter I and may not petition the Coast Guard for an occasional towing permit. We must also reiterate that activities that already fall into the list of activities that do not require Subchapter M certification should not be considered for an occasional towing permit.

From 46 C.F.R. 136.105, these activities are:

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1. A vessel less than 26 feet (7.92 meters) in length measured from end to end over the deck (excluding the sheer), unless that vessel is pushing, pulling, or hauling a barge that is carrying oil or hazardous material in bulk;
2. A vessel engaged in one or more of the following:
 - a. Assistance towing as defined in §136.110; Towing recreational vessels for salvage; or Transporting or assisting the navigation of recreational vessels within and between marinas and marina facilities, within a limited geographic area, as determined by the local Captain of the Port (COTP);
 - b. A workboat operating exclusively within a worksite and performing intermittent towing within the worksite;
 - c. A seagoing towing vessel of 300 gross tons or more subject to the provisions of subchapter I of this chapter;
 - d. A public vessel as defined in 46 U.S.C. 2101; A propulsion unit used for the purpose of propelling or controlling the direction of a barge where the unit is controlled from the barge, is not normally manned, and is not utilized as an independent vessel.
6. It should also be noted that Occasional Towing is to be done only by vessels that are certificated under another subchapter, which specifically excludes non-certificated vessels, such as commercial fishing vessels, oceanographic research vessels without a current COI, and other uninspected passenger or school vessels.

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AUTHORITIES

1. 46 C.F.R. Subchapter M - Towing Vessels
2. 46 C.F.R. § 2.01-45 - Excursion Permit
3. 46 C.F.R. Subchapter E - Load Lines

NATIONAL TOWING SAFETY ADVISORY COMMITTEE (NTSAC)
TASK STATEMENT
Task # 21-01

I. TASK TITLE

“Recommendations for the Criteria Used to Apply the Term “Occasional Towing”
Abbreviated: *Occasional Towing*

II. BACKGROUND

46 C.F.R. §136.105(a)(5) states that Subchapter M is applicable to all U.S. flagged towing vessels except when the vessel is inspected under other subchapters and performs *occasional towing*. During the spring 2019 meeting of the legacy Towing Safety Advisory Committee, the public provided comments expressing concerns regarding the lack of a clear and explicit definition for the term *occasional towing*. It is the marine industry’s contention that the ambiguity of the term *occasional towing* has resulted in the inconsistent implementation of Subchapter M across Officer in Charge, Marine Inspection (OCMI) Zones and has created confusion amongst vessel operators who are eager to learn what methodology the U.S. Coast Guard uses when applying such a term.

III. DISCUSSION

The U.S. Coast Guard has provided the following clarification on the meaning of *occasional towing* within the Frequently Asked Questions repository:

Request that the Coast Guard provide a definition of “occasional towing” as it is used in 46 C.F.R. §136.105(a)(5), which exempts “a vessel inspected under other subchapters of this chapter that may perform “occasional towing” from Subchapter M.

“Occasional towing” is described as engaged in the “infrequent” and “irregular” act of commercial towing (assistance towing exempt). “Infrequent” describes engaged in towing a minority amount of time. “Irregular” describes towing not on an established and routinely scheduled route or operation.

IV. TASK

The U.S. Coast Guard requests that NTSAC identify the parameters OCMI should use to determine whether a vessel inspected under subchapters other than Subchapter M performs *occasional towing*. Take into consideration the type of service that a vessel is constructed and certified to perform when drafting your report. If a vessel is purpose built as a towing

Enclosure (5) to NOSAC Final Report for Occasional Towing Task Statement
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vessel, then *occasional towing* should not apply. In completing this task, please provide written examples of vessel operations that the U.S. Coast Guard should consider *occasional towing*. Such examples should account for and describe the infrequent and irregular nature of the operation.

V. ESTIMATED TIME TO COMPLETE TASK

NTSAC will provide a Final Report to the Coast Guard during its spring 2022 meeting.

VI. COAST GUARD TECHNICAL REPRESENTATIVES

Mr. Scott Kuhaneck, 202-372-1221, Thomas.S.Kuhaneck@uscg.mil

Ms. Jennifer Hnatow, Jennifer.L.Hnatow@uscg.mil

VII. NTSAC CONTACT

Chair:	Laura Wilcox	Laura.k.wilcox@gmail.com
CoChair	Eric Johansson	ejohansson@sunymaritime.edu

VIII. ENCLOSURES

(1) USCG Response Letter to OMSA dated 14 May 2018

Table of Towing activities Identified by the Subcommittee for an Occasional Towing Criteria Assessment

46 CFR Subchapter -	Possible examples of any towing	
All Subchapters	Lifeboat or rescue boat being towed alongside or astern of any class of vessel	Extremis situation, discussed, not applicable
D - Tank Vessels	Yokama fenders for lightering operations (practice is to carry, hoist, and lower, not tow) (not towing)	No action
D - Oil Spill Recovery Vessels Holding capacity > 20% dwt	No examples	No action
H - Passenger Vessels (≥100 GT)	No examples	No action
I-A - MODU	No examples	No action
K - Small Passenger Vessels (<100 GT; > 150 passenger or >49 accomm overnight)	No examples	No action
L - OSV (≥15 GT)	Survey gear	Assessed
L - OSV (≥15 GT) (AHTS)	Static tows	Assessed
L - OSV (≥15 GT)	Remote Operated Vehicles (not towing)	No action
L - OSV (≥15 GT)	Subsea Construction Cranes (not towing)	No action
L - OSV (≥15 GT)	Moonpool activities (not towing)	No action
R - Nautical Schools (Public, Civilian, Sailing)	Training exercise survey gear (inspected under Sub T)	No action
T - Small Passenger Vessels (< 100 GT; ≤ 150 psgr; ≤ 49 overnight accomm)	Training vessel or OSRV towing boom; skimmers; bladders	Assessed
T - Small Passenger Vessels (< 100 GT; ≤ 150 psgr; ≤ 49 overnight accomm)	Survey gear	No participation, referenced, not assessed
U - Oceanographic Research Vessels (≥300 GT seagoing motor)(<300 GT uninsp)	Survey gear	No participation, referenced, not assessed
Any Subchapter	Movement and relocation of MODUs (Sub I exepted)	Conducted by Sub I or M
Any Subchapter	Movement of FPSO (Floating Production Storage and Offloading) Units and similar storage and production units (Sub I exepted)	Conducted by Sub I or M
Any Subchapter	Installation of Fixed and Floating Offshore structures (not towing)	No action
Any Subchapter	Removal of Fixed and Floating Offshore structures (not towing)	No action
Any Subchapter	Installation of FPSO (Floating Production Storage and Offloading) Units and similar storage and production units (not towing)	No action
Any Subchapter	Removal of FPSO (Floating Production Storage and Offloading) Units and similar storage and production units (petroleum, LNG, etc) (not towing)	No action