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CGD-H(do) Policy Letter 01-2025
August 19, 2025

From: J. E. Fothergill, CAPT
CGD-H OCS OCMI

To: Distribution

Subj: SERVICING OF LIFEBOATS, RESCUE BOATS, AND ASSOCIATED LAUNCHING
APPLIANCES ON FLOATING OUTER CONTINENTAL SHELF (OCS) FACILITIES

Ref: (a) Title 33 Code of Federal Regulations (CFR) Chapter I, Subchapter N
(b) CG-OES Policy Letter 01-22 Determination of Whether a Floating Outer Continental Shelf
Facility (FOF) is a Vessel
(c) CG-MMC Policy Letter 01-22 Merchant Mariner Credential Endorsements for Service on
FOFs
(d) CG-CVC Work Instruction 033(1) Non-Vessel Floating OCS Facilities (FOF) - Compliance
Requirements

1. PURPOSE. This policy provides guidance for provisions to service lifeboats, rescue boats, and their respective launching appliances while a Floating OCS Facility (FOF) is in operation.
2. ACTION. Personnel conducting inspections on behalf of the Heartland (Eighth) District OCS Officer in Charge, Marine Inspection (CGD-H OCS OCMI) shall comply with this policy.
3. DIRECTIVES AFFECTED. None.
4. BACKGROUND.
 - a. Historically, FOFs complied with various regulations found in 46 CFR Part 109, Mobile Offshore Drilling Units – Operations, although there was no regulatory path to Part 109 from Ref (a). This voluntary compliance with Part 109 was utilized by both the Coast Guard and industry to manage operations on FOFs.
 - b. In the late 2010s, the Coast Guard began reviewing its policies and numerous recommendations by the National Offshore Safety Advisory Committee related to Coast Guard oversight of FOFs, resulting in the revision of procedures to reflect that 46 CFR Part 109 was not applicable to FOFs. The Coast Guard then issued ref (b) and (c), followed by ref (d), which collectively realigned Coast Guard oversight of FOFs within the applicable regulatory framework.
 - c. Non-applicability of 46 CFR Part 109 for FOFs removed provisions that had previously facilitated routine maintenance and repairs. 46 CFR 109.301(b)(3) states *“If lifeboats, rescue boats or rigid liferafts are maintained and repaired while the unit is in operation, there must be a sufficient number of lifeboats and liferafts remaining available for use to accommodate all persons on board.”* There is no similar provision listed within any remaining regulations, including 33 CFR Part 146, Operations, for FOFs. Unlike traditional vessels that have scheduled dockside or drydock maintenance periods that facilitate regular maintenance while the vessel is not in operation, FOFs are always on location and are considered as “in operation” when personnel are on board. The lack of maintenance provisions for these facilities in applicable regulations has created the need for

operators to request, and for the OCMI to consider, approval of otherwise routine and necessary maintenance events for this equipment.

- d. Ref (d) was published as the Coast Guard's current national policy on FOF compliance requirements. However, it does not address allowances for lifeboat, rescue boat, or launching appliance maintenance for FOFs while in operation.

5. POLICY.

- a. The CGD-H OCS OCMI has determined that while 46 CFR Part 109 does not directly apply to FOFs, the provisions of 46 CFR 109.301(b)(3) are acceptable as an equivalence in accordance with 33 CFR 140.15, provided the conditions of 5.c of this policy are met.
- b. Routine maintenance is defined as those maintenance items specified by regulation or by an original equipment manufacturer (OEM) in the equipment's operation and maintenance manual (O&M manual) that are preventative in nature and are on a recurring basis (e.g. fuel and lubricant changes, falls renewals, release gear servicing, weight testing and minor repairs such as starter motor, alternator and water or hydraulic pump replacements, etc.). Lifesaving appliances not required to have an O&M manual may have preventive maintenance listed in a separate maintenance schedule provided by the OEM. Routine maintenance does not include any major repairs (e.g. motor or marine transmission replacement, winch overhaul/replacement, davit structural repairs, etc.).
- c. The routine maintenance and repair of lifeboats, rescue boats, and their associated launching appliances is allowable while an FOF is in operation, without notification to the Coast Guard, **if the following conditions are satisfied:**
 - 1. Hazards to personnel safety must be mitigated prior to taking a lifeboat, rescue boat, or associated launching appliance out of service (OOS) for routine maintenance. Operators should, at a minimum, consider current facility operations, weather, personnel awareness, and the mitigations for each while this equipment is OOS;
 - 2. No more than one lifeboat station can be OOS at a given time and there must be enough lifeboats and liferafts remaining available for use by **all** persons on board;
 - 3. The timeframe that a lifeboat, rescue boat, or associated launching appliance is OOS is not to exceed 48 hours; and
 - 4. Maintenance and repairs must be routine, as defined in 5.b above.
- d. Any need to take a lifeboat, rescue boat, or its launching appliance OOS that does not satisfy the criteria listed in 5.c. above will require a case-by-case review and approval from this office. This includes major corrective repair or replacement actions because of equipment failure.

6. FORMS/REPORTS: None

7. QUESTIONS. Questions may be directed to this office via the contact information above.

8. DISTRIBUTION.

- a. Heartland District units tasked with conducting inspections of behalf of the CGD-H OCS OCMI.
- b. Internet release authorized.

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