



TUGSAFE INTERNATIONAL ADDENDUM

Guidelines for Inspected Towing Vessels Under 300 GRT

Date: _____

This job aid provides guidance for applicability of international conventions on towing vessels required to comply with 46 CFR Subchapter M that operate internationally. Requirements are based on length, build date and a tonnage measurement system. [NVIC 11-93 Change 3](#) provides Coast Guard guidance on applicability of tonnage measurement systems.

Vessel Name: _____ Official Number: _____

Overall Length: 79 feet or more. Convention Length: Less than 79 feet. Assigned GT-ITC tonnage: 500 or more.

Certificates		
Requirement	Applicability	Cite
<input type="checkbox"/> Int'l Tonnage Certificate (ITC)	≥ 79 ft.	ITC Article 7 and 46 CFR Part 69
<input type="checkbox"/> Int'l Load Line Certificate (ILLC)	¹	46 CFR Part 42 and ILLC Article 16
<input type="checkbox"/> Cargo Ship Safety Radio Certificate (CSSRC)	300 GT-ITC	SOLAS I/12
<input type="checkbox"/> Int'l Oil Pollution Prevention Certificate (IOPP)	400 GT-ITC	MARPOL Annex I and 33 CFR 151.19
<input type="checkbox"/> Marpol Annex IV Statement of Voluntary Compliance	^{2,8}	NVIC 01-09 (Guidance)
<input type="checkbox"/> Int'l Air Pollution Prevention Certificate (IAPP)	400 GT-ITC	MARPOL Annex VI/6
<input type="checkbox"/> Int'l Energy Efficiency Certificate (IEE)	400 GT-ITC	IMO Resolution MEPC.203(62)
<input type="checkbox"/> Int'l Anti-Fouling System Certificate.	400 GT-ITC ³	33 USC 3821 and AFS.1/Circ. 49
<input type="checkbox"/> Cargo Ship Safety Construction Certificate (CSSCC)	500 GT-ITC	SOLAS I/12
<input type="checkbox"/> Cargo Ship Safety Equipment Certificate (CSSEC)	500 GT-ITC	SOLAS I/12
<input type="checkbox"/> Cargo Ship Safety Certificate (CSSC)	500 GT-ITC ⁴	SOLAS I/12
<input type="checkbox"/> Continuous Synopsis Record (CSR)	500 GT-ITC	SOLAS XI-I/5
<input type="checkbox"/> Document of Compliance (DOC) Typically a copy.	500 GT-ITC	SOLAS IX/4
<input type="checkbox"/> Safety Management Certificate (SMC)	500 GT-ITC	SOLAS IX/4
<input type="checkbox"/> Int'l Ship Security Certificate (ISSC).	500 GT-ITC ⁵	ISPS Part A 19 and 33 CFR 104.297
<input type="checkbox"/> Int'l Ballast Water Management Statement of Voluntary Compliance	^{6,8}	CVC Policy 17-05 (Guidance)
<input type="checkbox"/> Maritime Labour Cert. (MLC) Statement of Voluntary Compliance	500 GT-ITC ^{7,8}	NVIC 02-13 Ch. 1 (Guidance)
Equipment and Document Spot-Checks		
Requirement	Applicability	Cite
<input type="checkbox"/> Vessel equipped and in compliance with applicable certificates.	All	N/A
<input type="checkbox"/> Global Maritime Distress and Safety System (GMDSS)	300 GT-ITC	SOLAS IV and 47 CFR 80.161
<input type="checkbox"/> Long Range Identification and Tracking (LRIT)	300 GT-ITC	SOLAS V/19-1 and 33 CFR 169.205
<input type="checkbox"/> Oil Record Book	400 GT-ITC	MARPOL I/17
<input type="checkbox"/> Garbage Management Plan	400 GT-ITC	MARPOL V/9
<input type="checkbox"/> Garbage Record Book	400 GT-ITC	MARPOL V/9
<input type="checkbox"/> Ship Oil Emergency Plan (SOPEP)	400 GT-ITC	MARPOL I/37
<input type="checkbox"/> Ship Energy Efficiency Management Plan (SEEMP)	400 GT-ITC	MARPOL VI/22
<input type="checkbox"/> Fire Control Plan	500 GT-ITC	SOLAS II-2

1. Applicability for new vessels (built on or after July 21, 1968) is ≥ 79 ft. Applicability for existing vessels (built before July 21, 1968) is ≥ 150 GRT.
2. Applies to all vessels that carry >15 persons (passengers and crew). Applies to all other vessel that are > 400 GT-ITC ITC.
3. Only required on vessels that have an anti-fouling system.
4. Used as an alternative for a CSSCC, CCSEC and CSSRC.
5. Vessel must have an approve VSP, an ASP cannot be used for Int'l trade.
6. Applies to vessels designed or constructed to carry ballast water.
7. The Maritime Labour Certificate (MLC) and Maritime Labour Compliance SOVC – Part 1 are issued by RO. The Declaration of Maritime Labour Compliance SOVC – Part 2 is completed by the company.
8. Although not mandatory and administered through a voluntary program, vessel owners who operate on international routes are encouraged to participate.