



## Vessel Response Plans and the New Subchapter M Towing Vessel Regulations

There has been a lot of information posted on maritime web sites and blogs regarding Subchapter M requirements. These new rules require the majority of towing vessels be inspected and certificated by the Coast Guard. Previously, as uninspected vessels, towing vessels were not limited to a specific route. On July 20, 2018, the Coast Guard will begin enforcing Subchapter M regulations on applicable vessels and this may impact where and how they may operate.

Towing vessels have and continue to provide incredible service to our response community. Their importance is further reinforced by the requirement to be listed within Vessel Response Plans (VRPs) for response services. Such response services include, but are not limited to, salvage and marine firefighting and other emergency services addressed in a VRP. This message is intended to reinforce existing efforts among plan holders and their respective service providers to ensure that towing vessels listed in VRPs are able to meet regulatory planning criteria in geographic areas where their respective tank and nontank vessels operate.

To quickly summarize Subchapter M requirements, applicable towing vessels will now be issued a Certificate of Inspection (COI). Geographic limitations to operating areas and restrictions on operating conditions may now be different than the vessel's capabilities at the time the VRP was approved. For planning purposes, if your VRP is for an offshore area and the towing vessel resource listed in the VRP is now certificated for lakes, bays, and sounds, the vessel may no longer be capable of responding offshore in the event the VRP is activated. As another example, a resource identified in a VRP may need to carry a large number of persons in addition to primary crew for marine firefighting. The number of passengers allowed in addition to a vessel's primary crew will now be identified on the COI and may limit this ability. Lastly, the COI will also identify the vessel's service and should align with the response service as identified in the VRP. As an example, a resource listed for emergency towing service in a VRP should not have a COI issued for passenger service.

To assist plan holders in their communications with resource providers to ensure alignment with new Subchapter M requirements, the following information should be verified for the listed response resources:

1. COI expiration date
2. Vessel name and service
3. Number of total persons allowed, including persons in addition to crew
4. Route permitted (Oceans, Coastwise, Limited Coastwise, Great Lakes, Lakes Bays and Sounds, Rivers)
5. Conditions of operation (this may include weather and sea state, carriage of equipment and personnel, requirements specific to vessel service such as firefighting or emergency towing)
6. Date of annual inspection endorsement

For COI concerns specific to response resources listed in your VRP, the owner/operator of the response

resource should contact the Coast Guard Office (Officer in Charge of Marine Inspection) that issued the COI.

If a VRP holder has additional concerns or needs to update this information in their plan, contact the VRP Help Desk by email at [vrp@uscg.mil](mailto:vrp@uscg.mil).



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