



TOWING VESSEL INSPECTION

Forthcoming Inspection Regime Will Improve Safety, Security, and Environmental Protection

The Coast Guard and Maritime Transportation Act of 2004 added towing vessels to the list of vessels subject to inspection and authorized the Coast Guard to “establish by regulation a safety management system appropriate for the characteristics, methods, and nature of service of towing vessels.” AWO worked with the Coast Guard to propose this legislation, and has continued to work with the agency since passage to develop a notice of proposed rulemaking (NPRM). An inspection regime based on a Safety Management System (SMS) will improve safety, security, and environmental protection on the nation’s waterways.

Through participation on the Congressionally-authorized Towing Safety Advisory Committee (TSAC), AWO members from across the country have assisted in making recommendations to the Coast Guard on the composition of the forthcoming regulations. AWO has also worked through the Coast Guard-AWO Safety Partnership to develop and implement an innovative “bridging program” to facilitate the transition to towing vessel inspection for both industry and the Coast Guard.

A Safety Management System and Third-Party Audits Are Essential to a Sound Regulatory Framework

TSAC has recommended that the forthcoming regulations require all towing vessels to implement a Coast Guard-accepted SMS. For the past decade, AWO members have been required to implement the AWO Responsible Carrier Program, a safety management system for towing vessels, as a condition of association membership. Implementation of safety management systems has resulted in dramatic improvements in safety and reductions in spills and pollution, and the National Transportation Safety Board (NTSB) has named establishment of a safety management requirement for all marine vessels one of its top-ten “most wanted” transportation safety improvements.

TSAC has also recommended a multi-layered oversight system including internal audits, external audits by Coast Guard-approved third parties, and direct Coast Guard oversight of all companies and all towing vessels. Approved third parties can play an important role in leveraging limited Coast Guard resources.

AWO urges immediate publication of the towing vessel inspection NPRM based on the TSAC recommendations as the best way to improve safety, security, and environmental protection in the towing industry.

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