

# **Towing Vessel Inspection: From Vision to Implementation**

**Interregion Safety Committee**

**April, 2010**

# How It All Began

- **Coast Guard-AWO Safety Partnership**
  - Legacy of trust and cooperation
  - Framework for analysis
  - Spring 2003: Towing Safety Working Group
  - Fall 2003: "Strawman" inspection concept

# Shared Coast Guard- Industry Vision

- **Mutual goals:**
  - Safety
  - Security
  - Environmental protection
- **Mutual needs:**
  - Leverage and use limited resources smartly

# Key Concepts

- **Value of safety management systems in addressing casualty causes**
  - Management decisions
  - Actions of crew and other personnel
- **Risk-based decision making**

# From Vision to Legislation

- **12/03: Industry leaders meet with Commandant**
- **2/04: DHS requests new legislative authority**
- **7/04: Congress passes legislation**
  - **Inspection of towing vessels**
  - **Safety management system**

# From Legislation to Regulation: The Process

- **Pre-rule stage**
  - Agency develops concept, language
- **Proposed rule stage**
  - NPRM released for public comment
- **Final rule stage**
  - Agency finalizes rule based on public comment

# From Legislation to Regulation: A Case Study

- **Towing Safety Advisory Committee (TSAC)**
  - 12/04 Inspection Working Group
  - 10/05 report
  - 9/06 report
  - 3/07 review of draft regulatory text, redline
  - 2/08 review of revised draft text

# TSAC Recommendations

- **New CFR Subchapter**
- **SMS for all towing vessels**
- **Equipment standards**
- **Personnel standards**
- **Three-tiered audit/oversight system**
  - **Internal audits**
  - **Approved third-party audits**
  - **Coast Guard oversight**

# 2/08 Coast Guard Draft

- Certification
- Compliance
- Towing Safety Management System (TSMS)
- Third Party Organizations
- Operations
- Lifesaving
- Machinery and Electrical Systems
- Construction and Arrangement

# Current Status

- **Draft NPRM under DHS review**
- **Towing Vessel Bridging Program underway**
- **Towing Vessel National Center of Expertise established**

# Next Steps

- **OMB review of draft NPRM**
- **NPRM publication**
- **Comment period, public meetings**

# Questions and Discussion