

# Responsible Carrier Program®

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REVISED



The American  
Waterways Operators



## Disclaimer

The Responsible Carrier Program® (RCP) is a registered trademark of The American Waterways Operators, Inc. The AWO RCP is intended to improve marine safety and environmental protection in the tugboat, towboat and barge industry. The program aims to accomplish this objective by establishing preferred industry operating principles and practices as voluntary standards of conduct for tugboat and towboat companies. While the standards outlined in the Responsible Carrier Program meet or exceed current governmental standards for the operation of barges and towing vessels, they do not necessarily constitute an exhaustive catalogue of all potential safety practices that any particular company should undertake. Each company must determine for itself its own operational needs and the range of safety measures necessary to protect its employees, the public, and the environment. The program is not intended to supplant any existing safety procedures that a company may have in place in excess of the standards outlined herein. Finally, while the objective of the Responsible Carrier Program is to enhance safety and environmental protection in the tugboat and towboat industry, no program can be considered a panacea that will completely eliminate injuries, accidents or pollution incidents. The pursuit of better, safer operations through continuous improvement must always be the industry's goal.

TRACKED CHANGES KEY	
Additions	= Sample Text
Deletions	= <del>Sample Text</del>

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## I. Introduction<sup>1</sup>

On December 7, 1994, the Board of Directors of the American Waterways Operators (AWO) unanimously approved the establishment of the AWO Responsible Carrier Program® (RCP) as a code of practice for association member companies. The Board's historic vote marked the culmination of an intensive, eight-month effort to develop the outlines of a new, industry-driven safety program for the tugboat and towboat industry. In voting to adopt the ~~RCP~~Responsible-Carrier Program, however, the Board did more than signal its approval of the code of practice and its endorsement of the process that produced it. Perhaps more significantly, the Board directed that a new process begin to help the newly developed safety program take root in the industry and to ensure that the program's goals of a better, safer, and more responsible industry are realized. To that end, the Board set January 1, 1998, as the target date to bring all AWO member companies into compliance with the ~~Responsible-Carrier Program~~RCP.

### *Background and Purpose*

Development of the ~~RCP~~Responsible-Carrier Program began in April 1994, when the Board of Directors authorized the establishment of a specially-selected task force of senior industry executives. Comprised of 13 members representing a broad cross section of AWO's diverse membership – inland, coastal, and harbor operators; dry and liquid carriers; large and small companies drawn from each of the association's five regions –the working group was tasked with developing a series of "recommended positions, practices, and standards aimed at enhancing the safety of the barge and towing industry." This work stemmed from the directive of the association's newly-approved strategic plan, *AWO 2000*, that AWO "improve industry safety and environmental protection by establishing preferred industry operating principles and practices," and from the process of industry self-examination which began in the wake of the September 1993 derailment of the Amtrak's *Sunset Limited* train at Big Bayou Canotg in Mobile, Alabama.

Throughout the Spring and Summer of 1994, the working group labored to fulfill the Board's mandate and to develop the outlines of a new, industry-specific safety program for the tugboat and towboat industry. By late September, the framework of the program had emerged, and a draft document was shared with all AWO members, including shipyard and affiliate members, for review and comment. Throughout the month of October, regional briefing sessions were held in Greenville, Mississippi; New York, New York; St. Louis, Missouri; and Seattle, Washington, to subject the draft program to the critical review of AWO members in all regions of the country. Armed with this feedback, the working group reconvened in early November to consider the input received from the membership, to revise the document as necessary, and to develop final recommendations for consideration by the AWO Executive Committee and Board of Directors. On November 3, the ~~Responsible-Carrier Program~~RCP was approved by the AWO Executive Committee. The Committee-approved changes to the content of the draft ~~program~~RCP, as well as its recommendations for implementation and use of the new safety program, were shared with all AWO members in mid-November. On December 7, following a final briefing and discussion session on the content of the ~~program~~RCP held December 6, AWO's Board of Directors voted unanimously to adopt the ~~Responsible-Carrier Program~~CP as a code of practice for AWO member companies.

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<sup>1</sup> The introduction received technical edits on 10/27/2016.

## *The Responsible Carrier Program*

The ~~program~~RCP approved by the Board of Directors ~~originally had~~ has three principal parts – management and administration, equipment and inspection, and human factors – reflecting the role that each of these components plays in ensuring safe and efficient vessel operations. The ~~program~~RCP is intended to serve as a template for AWO member companies to use in developing company-specific safety programs that are consistent with applicable law and regulation, that incorporate sound operating principles and practices ~~not currently required by law or regulation~~, and that are practical and flexible enough to reflect a company's unique operational needs. ~~The three sections of the program are meant to be used in conjunction with one another; the policies and procedures called for in the management and administration section, for example, should reflect the recommended principles and practices outlined in the equipment and inspection and human factors sections, as well as the variables of a company's trade, area of operations, size and organizational structure.~~

The ~~RCP~~Responsible Carrier Program does not attempt to catalogue or to duplicate that which is already ~~mandated~~ required by federal law or regulation. ~~(For clarity, references to applicable law and regulation are included in several areas of the document.)~~ Rather, the ~~program~~RCP seeks to complement and build upon existing law and regulation and to identify sound operating principles and practices that will enhance the safety of a company's operations. ~~The Responsible Carrier Program~~RCP can be used as a framework to comply with vessel inspection regulations under 46 CFR Subchapter M., with or without governmental action in these areas. The ~~program~~RCP is intended to be a practical ~~one program and it~~ It takes its inspiration not from a government-prescribed standard or from a deep-sea, ship-focused model, but from the experience of the tugboat and towboat industry ~~and its operators themselves~~ itself. The practices and principles outlined herein are, in large measure, based on principles of safe and sound operation that many companies in the industry have already voluntarily embraced. This program aims to build upon that foundation by extending those practices and principles throughout the industry as a whole.

It is not the aim of the ~~RCP~~Responsible Carrier Program to homogenize industry operations, however; the industry is far too diverse for such a simplistic approach. Rather, the ~~program~~RCP aims to combine a set of common principles and practices that can be observed ~~and incorporated~~ by a company regardless of its trade or its size, with an emphasis on company-specific policies and procedures which may vary significantly both between and among industry sectors. The policies and procedures developed by a small inland grain carrier will inevitably differ from those of a large coastal oil transporter; indeed, the policies developed by one carrier will likely differ even from those of a similarly situated company. The ~~RCP~~Responsible Carrier Program is rooted in the premise that common principles of safe operation, and industry practices that are recognized as sound standards industry-wide, can and must coexist with the operational diversity that has long been a hallmark of the U.S. tugboat, towboat and barge industry.

## *Implementation and Use*

In approving the establishment of the ~~Responsible Carrier Program~~[RCP](#), AWO's Board of Directors recognized that developing a comprehensive plan for implementation and use of the new safety program would be critical to achieving the program's objectives. *AWO 2000* directed the association to "improve industry safety and environmental protection by establishing preferred industry operating principles and practices," but the mere development of such a program would not by itself achieve these crucial goals. To make real gains in marine safety and environmental protection, the Board recognized that the next step for the association must be to put the ~~Responsible Carrier Program~~[RCP](#) in place and to help all AWO members integrate the program into their own companies' operations.

The Board set January 1, 1998, as the target date to bring all AWO member companies into compliance with the ~~Responsible Carrier Program~~[RCP](#). To assist ~~the membership~~[AWO members](#) in meeting this target, the Board directed ~~that~~ the development of an implementation and assistance program aimed at giving all AWO members the tools they needed to adopt the ~~RCP~~[Responsible Carrier Program](#) ~~commence~~ immediately following Board approval of the program. Development of such a program, which included the identification or development of sample policies and procedures, identification of industry training resources, and a series of regional implementation seminars, then began, and a detailed implementation plan was presented to the AWO membership and Board of Directors ~~at the association's~~ [in](#) April 1995 ~~Annual Meeting~~. The Board also recognized the importance of monitoring the implementation process closely to ensure continued progress toward universal member adoption of the program and to identify any difficulties requiring modification, either of the document itself or of the implementation program. To that end, the Board received regular reports on the implementation process at each of its meetings between 1995 and 1998.

### *Third-Party Audit Requirement~~†~~*

In December 1995, AWO's Board of Directors established the ~~Responsible Carrier Program~~[RCP](#) Audit Task Force. The mission of this member task force was to consider the need for, and value of, an external audit [component to the RCP](#) ~~program for the Responsible Carrier Program~~. In October 1996, the Board approved the recommendation of the Audit Task Force that an audit program be established for the ~~Responsible Carrier Program~~[RCP](#). The Board concluded that not only would an external audit advance the objectives of marine safety and environmental protection, but ~~that~~ it would significantly increase the external credibility of the ~~RCP~~[Responsible Carrier Program](#) and facilitate the attainment of other important benefits, such as charterer acceptance, recognition from federal and state regulators, and lower insurance premiums. It became increasingly clear to the task force and ~~to~~ the Board of Directors that some form of audit would be required by regulators, shippers, and insurers as a condition of conferring many of the tangible benefits of the ~~RCP on~~[RCP on](#) individual members. Given these conclusions, the Board established a Technical Subcommittee to develop the details of a future [audit component to the RCP](#). ~~Responsible Carrier Program audit.~~

The ~~Responsible Carrier Program~~[RCP](#) Audit Task Force Technical Subcommittee first met in January 1997 and began the challenge of developing an audit program that increases industry safety, provides recognition for responsible operators, generates greater industry credibility in

the public forum, and recognizes the diverse needs of AWO's membership. In August 1997, the task force recommended that all members of AWO achieve audited compliance with the ~~RCP Responsible Carrier Program~~ by January 1, 2000, or within two years of joining the association, whichever was later. In October 1997, in response to the recommendation by the task force, the ~~AWO~~ Board of Directors voted to approve the establishment of a ~~third-party~~ audit program for the ~~RCP Responsible Carrier Program~~, including the creation of a ~~Responsible Carrier Program~~ Accreditation Board responsible for the selection, orientation, oversight and recertification of AWO-certified auditors. The Accreditation Board also plays a role in clarifying or interpreting the audit guidelines and in considering and recommending changes to the audit program as appropriate. The establishment of an audit program was an extraordinarily important step for the ~~Responsible Carrier Program~~ ~~RCP~~, AWO and the entire industry.

### *Condition of Membership*

In a move that fundamentally changed the face of AWO, in April 1998, the membership voted to change the association's *Constitution and Bylaws* to require ~~that~~ carrier members ~~to~~ demonstrate a "good faith commitment" to achieve compliance with the AWO ~~Responsible Carrier Program~~ ~~RCP~~, and undergo an AWO-certified audit of their program by January 1, 2000, or within two years of joining the association, whichever was later. In 2004, the Board of Directors voted to reduce the timeframe requirement to within one year of joining the association. No longer was it enough to simply operate a towing company and pay dues to belong to AWO. Now, members had to commit to operating their companies ~~to operate~~ safely and responsibly by implementing the ~~Responsible Carrier Program~~ ~~RCP~~, and then demonstrate their implementation by undergoing a comprehensive ~~external~~ third-party audit conducted by professional, experienced and knowledgeable auditors. In 2008, the Board ~~of Directors~~ voted to recommend to the full membership that the "good faith commitment" clause be deleted and to require members to achieve compliance within one year.

On January 1, 2000, 100 percent of AWO's carrier members were in audited compliance with the ~~Responsible Carrier Program~~ ~~RCP~~. Thirteen member companies chose not to comply with this condition of membership and thus, ~~had~~ their memberships in AWO ~~were~~ terminated.

### *~~The RCP and Responsible Carrier Program as An Existing Towing Safety Management System under 46 CFR Subchapter M~~*

In December 2003, the AWO Board of Directors voted to pursue a towing vessel inspection system that builds upon the ~~Responsible Carrier Program~~ ~~RCP~~ in concert with the U.S. Coast Guard. Congress, ~~in~~ ~~through~~ 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 a safety management system appropriate for towing vessels.

The towing vessel inspection notice of proposed rulemaking was published in August 2011, proposing to establish a new Subchapter M of Title 46 of the Code of Federal Regulations containing requirements for towing vessel operations, lifesaving, firefighting, machinery and electrical systems and equipment, and construction and arrangements. The rule proposed ~~s~~ two

compliance options: implementation of a Towing Safety Management System (TSMS) audited by a Coast Guard-approved ~~third-~~third-party [organization](#), or annual Coast Guard inspection.

As the publication of the towing vessel inspection final rule approached, AWO's goal was to position the ~~RCP~~ [RCP](#) for acceptance by the Coast Guard as an [existing TSMS safety management system](#) under Subchapter M. To that end, in 2012 the ~~AWO~~ Board of Directors voted to transfer authority for the training and certification of RCP auditors to a third-party organization. The transition took place over 2013 and the ~~RCP's~~ [RCP](#)-addenda were revised to reflect the changes to the [administration of the](#) audit protocol and role of the third-party organization. At the same time, the ~~RCP~~-Accreditation Board became the ~~RCP~~-Standards Board to reflect its changed function.

As part of the effort to secure Coast Guard [recognition](#)~~acceptance~~ of the ~~R~~~~R~~~~C~~~~P~~~~CP~~~~as a~~~~TSMS~~, and ensure that the ~~RCP~~~~RCP~~ continues to provide a high level of value to AWO members as the industry-leading safety management system, the AWO Executive Committee endorsed the formation of a working group to undertake a gap analysis. Its charter ~~requires~~~~required~~ the ~~AWO~~~~RCP~~-Gap Analysis Working Group to compare and make recommendations to align the requirements of the ~~RCP~~~~RCP~~ with the requirements of the International Safety Management [\(ISM\)](#) Code, which was identified in the Subchapter M proposal as an approved safety management system, and examine the value of additional changes based on other safety management systems and customer vetting standards.

With the endorsement and participation of the Coast Guard, the ~~RCP~~-Gap Analysis Working Group first met in June 2014, and in October 2014 proposed to the ~~AWO~~ Board of Directors changes to the ~~RCP~~~~CP~~ to position it for Coast Guard acceptance as an [existing TSMS safety management system under Subchapter M](#). The Board approved the changes and subsequently approved an implementation date of January 1, 2016. ~~In June 2015, AWO received notification from the Coast Guard of their intent to accept the RCP as a Towing Safety Management System under Subchapter M. The working group continues to consider changes to enhance the value of the RCP by making it a compliance tool for Subchapter M and by drawing on other safety programs to make it a best-in-class safety management system. The RCP- Gap Analysis Working Group was renamed the RCP 21 Working Group to reflect the group's role in assessing future changes or revisions to the RCP's RCP- standard.~~

[The final towing vessel inspection rule was published in July 2016. The final rule largely reflected the NPRM, providing ~~for~~ two compliance options for operators: implementation of a TSMS audited by a Coast Guard-approved third-party organization, or annual Coast ~~g~~Guard inspection. AWO submitted the ~~Responsible Carrier Program~~~~RCP~~ to the Coast Guard for recognition as an existing safety management system in August 2016. As part of the submission, AWO proposed to ~~transition the Responsible Carrier Program~~~~RCP~~ to a pure safety management system by sunset~~removing~~ prescriptive equipment and inspection and human factors requirements that would be superseded by Subchapter M regulations, as recommended by the Task Force on the Future of AWO Safety Leadership in 2011 and endorsed by the AWO Board of Directors in April 2016. AWO also specified that the ~~Responsible Carrier Program~~~~RCP~~ would maintain recordkeeping, equipment or training elements that went beyond regulatory requirements.](#)



In November 2016, the Coast Guard officially recognized the ~~R~~RCP ~~CP~~ as an existing safety management system that meets requirements laid out in 46 CFR Subchapter M Part 138. The Coast Guard also ~~endorsed~~ affirmed AWO's plan to ~~transition~~ sunset ~~the Responsible Carrier Program~~RCP requirements superseded by Subchapter M regulations ~~to a pure safety management system~~. In May 2017, the ~~Responsible Carrier Program~~RCP Standards Board met to begin the revision process. The RCP 21 Working Group considered the Standards Board's changes in ~~XXX~~. The AWO Board of Directors approved the fully transitioned ~~Responsible Carrier Program~~RCP in October 2017, with an effective date for the revisions of ~~[date]~~.

### *Conclusion*

AWO members recognize that the process of enhancing marine safety and environmental protection is, and must be, a continuum. The Board ~~of Directors'~~ votes to establish the ~~Responsible Carrier Program~~RCP and to require compliance with the ~~RCP~~RCP as a condition of membership in AWO were milestones on a journey that continues ~~today~~. The ~~membership~~ of AWO ~~are~~ ~~is~~ committed to making the ~~RCP~~~~Responsible Carrier Program~~ a living document and a continuing process: incorporating lessons learned and new technological developments into the program; considering, debating, and adopting suggestions to improve, strengthen, and build upon the program; and, maintaining a constant fix on the underlying objective of improving industry safety and environmental protection.

There are many parties with a role to play in building a better, safer tugboat, towboat and barge industry, but the primary responsibility for making industry operations safer unquestionably lies with the industry itself. The ~~AWO~~ ~~American Waterways Operators'~~ ~~Responsible Carrier Program~~RCP is a tangible manifestation of the ~~association's~~ ~~organization's~~ acceptance of that responsibility, and its deep commitment to carrying it out.

## II. ~~Management and Administration~~ Safety Management System

Where applicable, ~~Each~~ each towing company ~~should~~ must develop and document written ~~the~~ policies and procedures ~~as outlined below~~ covering, at a minimum, those items outlined below. Companies ~~should~~ must abide by these policies ~~and procedures~~ in conducting their operations and ~~should~~ must ensure that their employees are aware of, and trained in, those policies and procedures which affect their job responsibilities. ~~Companies should develop a mission statement expressing their commitment to abide by their established policies and procedures and to ensure employee awareness and knowledge thereof.~~

All AWO-carrier members, as a baseline, ~~should~~ must ~~be in compliance with~~ follow all applicable federal laws and regulations concerning marine safety and environmental protection, including 46 CFR Subchapter M. All company policies and procedures ~~should~~ must be consistent with applicable law and regulation and ~~with in the~~ the guidelines provided in ~~the Equipment and Inspection and Human Factors sections of the AWO-Responsible Carrier Program~~ RCP. Required policies and procedures are to be documented and implemented. Parenthetical items preceded by "e.g.," (or "for example") may not be applicable in all situations and are intended to serve only as examples of the types of items which company policies and procedures may address.

### A. **Functional Requirements**

1. A company-wide ~~safety~~ mission statement expressing a commitment to abide by established policies and procedures at all levels ~~procedures and to ensure~~ employee awareness and knowledge thereof.
- ~~1.2.~~ 2. Procedures to systematically assess and manage identified risks to onboard personnel, vessels, and the environment. The procedures shall address:
  - a) Risk discovery
  - b) Risk evaluation
  - c) Risk control measures to establish appropriate safeguards to reduce risk to an appropriate level
  - d) Procedures to identify, assess, and manage the risk of hazards introduced by new or non-routine changes to: equipment, staffing (ashore or afloat), or procedures
- ~~2.3.~~ 3. ~~Policy~~ Policies and/or procedures to ensure compliance with applicable federal laws and regulations concerning marine safety and environmental protection, including ~~inspected vessel regulations under~~ 46 CFR Subchapter M.
- ~~3.4.~~ 4. Procedures to ensure document control, updating and distribution of relevant materials
- ~~4.5.~~ 5. Incident reporting and investigation procedure(s), to include:
  - a) Personal injury
  - b) Oil or hazardous substance spill

- c) Vessel accident
- d) Bridge, lock, or dock allision
- e) Grounding
- f) Other company-specific reporting procedures

~~5.6.~~ Near miss procedures, to include reporting, investigation and corrective and preventive action

~~6.7.~~ Corrective and preventive action procedures that apply to findings from internal and external incident investigations and audits, employee and customer suggestions, and management review, to include:

- a) Method for identifying non-conformities
- b) Follow-up time frame for initiating corrective action
- c) Method of tracking initiation and completion of corrective action, including assigned responsibility
- d) Lessons ~~Learned~~ learned procedures, to include communication procedures for disseminating lessons learned

~~7.8.~~ Performance measurement procedures, including number and rate of:

- a) Man-hours
- b) Fatalities
- c) Recordable injuries
- d) Lost time injuries
- e) Falls overboard
- f) Spills (number and volume)

## **B. Vessel Operating Policies and Procedures**

1. Company-specific vessel operating procedures (will depend on trade)
  - a) Bridge transit procedure
  - b) Voyage planning procedures
2. Vessel-specific operating procedures (will depend on vessel size, cargo, trade, etc.)
3. Procedures for determining vessel manning levels, taking the following into consideration: ~~including the following criteria:~~
  - a) Applicable law and regulation
  - b) Number, size, and type of barges to be moved
  - c) Towing route
  - d) Safety of personnel, equipment and environment
  - e) Service in which tow is engaged

- f) Functional duties required of the crew in addition to standard navigation
- g) Configuration of vessel superstructure, deck and engine room
- h) Extent of automation
- i) Size and power of equipment
- j) Environmental conditions
- k) Experience of crew

~~3.4.~~ Procedures for making horsepower/tow size decisions

~~4.5.~~ Procedures to ensure proper and valid documentation carried aboard vessels, including a list of documentation to be carried

~~5.6.~~ Fuel transfer procedures

~~6.7.~~ List of critical or essential equipment and systems, the sudden failure of which may place the vessel, crew or environment into a hazardous situation, or procedures to identify such equipment and systems

~~7.8.~~ Vessel maintenance procedures, including:

- a) Persons responsible for maintenance
- b) Maintenance schedules
- c) Qualifications and training requirements for persons responsible for maintenance
- d) Procedures to correct deficiencies identified during maintenance [See II.A.~~7~~6 above]
- e) Maintenance record retention procedure
- f) Risk assessment and approvals required, [when underway](#), before critical equipment or systems are shut down, bypassed, or taken out of service for maintenance [See II.B.~~6~~7 above]
- g) Lockout/tagout
- h) At a minimum, the vessel maintenance program records should include:
  - 1) Propulsion system (all major propulsion machinery, including engines, reduction gears, clutches, controls, shafting, bearings, and other items prone to wear)
  - 2) Steering system
  - 3) Miscellaneous auxiliary systems
  - 4) Electrical systems

~~8.9.~~ Vessel inspection ~~\_~~procedures, including:

- a) Persons responsible for conducting in-house inspections
- b) Frequency of inspections
- c) Qualifications and training requirements for persons responsible for conducting in-house inspections

- d) Procedures to correct deficiencies identified during inspections [See II.A.6.7 above]
- e) Inspection record retention program

~~9.10.~~ Cargo handling procedures

- a) Benzene procedure
- b) Vapor control procedures
- c) Cargoes requiring special handling (e.g., anhydrous ammonia, hydrogen sulfide, etc.)

~~10.11.~~ Lightering procedures (where applicable)

12. Procedures for identifying critical stores and supplies or list of critical stores and supplies

13. Watchstanding and work hours

a) Federal regulation provides that an individual licensed to operate a towing vessel may not work for more than 12 hours in a consecutive 24-hour period except in an emergency. 46 USC § 8104(h). See 46 USC § 8104(c) for Great Lakes.

b) All other crewmembers on a towing vessel must not be permitted to work more than 15 hours in any 24-hour period or more than 42 hours in a 72-hour period, except in an emergency or drill.

~~11.~~

**C. Safety Policy and Procedures**

~~1.~~ Company safety policy, including

~~2.~~

~~3.1.~~ a Accountability and commitment to safety

~~a) Hearing conservation~~

~~4.2.~~ Company safety rules, including:

- a) Painting in enclosed spaces
- b) Non-skid surfaces
- c) Flammable and combustible liquids

~~5.3.~~ Personal protective equipment policy, including:

- a) Use (including respiratory protection and fall arrest protection)
- b) Inspection
- c) Maintenance

d) Replacement

~~6.4.~~ Reporting of safety deficiencies and/or nonconformities

~~7.5.~~ Confined space entry

~~8.6.~~ Safety training, safety drills and safety meetings (including station bill), [\[see II.K. below\]](#)

a) Topics to be covered (e.g., first aid, CPR, firefighting, emergency ~~boat-~~[boat](#) operation, use of life rafts, survival suits, etc.)

b) Frequency

~~9.7.~~ Safe use of equipment

a) Deck machinery

b) Rigging

c) Welding and/or cutting equipment

d) Hand tools

e) Ladders

f) Abrasive wheel machinery

~~10.8.~~ Cargo knowledge (may include ~~material-~~safety data sheets)

9. Hazard communication procedures (29 CFR 1910.1200)

10. Blood borne pathogens

[11.](#) Fall overboard prevention

[12.](#) ~~Firefighting and lifesaving equipment, including at least quarterly inspection and maintenance-~~procedures requiring inspection and maintenance at least quarterly

[13.](#) Hearing conservation

~~11.~~

#### **D. Security Policy and/or Procedures**

1. [Security policy and/or procedures \(e.g., AWO's Alternative Security ~~Plan~~Program\)](#)

#### **E. Environmental Policy and/or Procedures**

1. Company environmental policy

2. Garbage disposal requirements, procedures and documentation

3. Handling of waste oil, oily bilge slops, and used filters
4. Hazardous waste disposal and handling
5. Sanitary systems and handling of sewage
6. Each towing vessel must have the following:

~~b)~~ a) ~~b)~~ Containment around fueling stations

b): Spill kit

#### **F. Emergency Response Procedures**

1. Personal injury response
2. Spill response plan and/or contingency plan
3. Vessel accident response~~response~~
4. Onboard emergency response training and drill procedures
  - a) Subject matter
  - b) Frequency
  - c) Documentation
5. Operator incapacitation procedure

#### **G. Audit and Review Procedures**

1. Internal audits
  - a) The internal auditing procedures must:
    - 1) Periodically evaluate the effectiveness of the safety management system
    - 2) Review the safety management system in accordance with the established procedures of the company, when needed
    - 3) Require reporting of non-conformities
    - 4) Be included in the corrective action procedure [See II.A.6-7 above]
    - 5) Include a management review
  - b) Types and frequency of internal audits:

~~1)~~ Internal audits must be carried out annually, and initiated by the anniversary date of the last internal audit, for all towing vessels and managing offices (all offices with management oversight of towing vessels).

1)

~~2)~~ Audits can be conducted up to three months before the anniversary of the original audit and will maintain the original anniversary date.

c) Factors for determining selection of personnel responsible for conducting internal audits, to include:

1) Qualification and training requirements

2) Requirement that personnel are independent of area being audited (as practicable)

~~Factors for determining selection of personnel responsible for conducting internal audits, to include:~~

~~1) Qualifications and training requirements~~

~~2) Requirement that personnel are independent of the area being audited (as practicable)~~

2. External Audits:

a) Types and frequency of external audits:

1) External audits are to be carried out once for each vessel, during a period not to exceed five years after the initial audit, and for each managing office, twice during a period not to exceed five years after the initial audit, and no more than three months prior to the anniversary of the initial audit. One audit ~~should~~must take place around the midpoint of the audit cycle, in the 27-33 month time frame.

Internal	Annual	Each boat-	Initiated by anniversary of last audit. <del>Maintain original anniversary date.</del>
		Each managing office-	<u>Maintain original anniversary date</u>
External	Once in 5 years	Each boat-	Not to exceed 5 years. <u>Initiated Up-up to 3 months before anniversary of last audit and must be completed or in progress by the anniversary date.</u>



	Twice in 5 years	Each managing office-	<p>Not to exceed 5 years.</p> <p><u>Initiated up to 3 months before anniversary of last audit and must be completed or in progress by the anniversary date</u><del>Up to 3 months before anniversary of last audit.</del></p> <p>Mid-period audit at 27-33 months.</p>
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## H. Vendor Safety

Procedures for evaluation of subcontractors and vendors providing towing and vessel assist services on their ability to provide an acceptable level of safety, including:

1. Preference when assigning towing, vessel assist services and/or fleet services to vendors that have a documented, and third-party audited, safety management system, and,
2. For vendors providing towing, vessel assist services and/or fleet services that maintain a routine and reoccurring business relationship with the member company, but do not participate in an audited safety management system such as the ~~R~~RCP or the International Safety Management Code~~CP or ISM~~, procedures to ensure that those vendors maintain an acceptable level of safety through at least one of the following:
  - a) On-site inspection of vessels and facilities
  - b) Pre-qualification through interview and completion of a safety assessment checklist with vendor safety/operations personnel

## I. Organization and Levels of Authority

1. Depict company organization and document authority and general responsibilities of individuals at different levels, including vessel master and crew and shoreside personnel. For vessel master and crew, clearly communicate that:
  - a) The safety of the towing vessel is the responsibility of the master and includes:
    - 1) Adherence to the provisions of the Certificate of Inspection (COI)
    - 2) Compliance with applicable regulations
    - 3) Compliance with the safety management system applicable to the vessel
    - 4) Review the safety management system applicable to the vessel and report non-conformities to shore-based management
    - 5) Supervision of all persons onboard in carrying out their assigned

duties

- b) The authority of the master includes:
    - 1) If the master believes it is unsafe for the vessel to proceed, that an operation endangers the vessel or crew, or that an unsafe condition exists, the master must ensure that adequate corrective action is taken and must not proceed until it is safe to do so.
    - 2) Nothing in the safety management system applicable to the vessel shall be misinterpreted in a manner that limits the master or mate (pilot) of their own responsibility to take such steps as he/she deems necessary and prudent to assist vessels in distress or for other emergency conditions.
    - 3) The master has the ability to request the company's help when necessary
  - c) The safety of the towing vessel is also the responsibility of the crew and includes:
    - 1) Compliance with the safety management system
    - 2) Compliance with applicable regulations
    - 3) Report unsafe conditions to the master and take action to prevent accidents
2. Designation of a person(s) ashore having direct access to the highest level of management (Designated Person Ashore)

**J. Personnel Policies or Procedures (may be a policy or procedure unless specified)**

1. Hiring
2. Physical exams/or physical standards
3. Drug and alcohol policy (46 CFR 16, ~~33~~ 33 CFR 95)
4. Proficiency evaluation
5. Orientation and training, including:
  - a) Who is trained
  - b) Subjects in which training is given
  - c) Frequency of training
6. Personnel development
  - a) Deck personnel
  - b) Tankermen
  - c) Engineers
  - d) Wheelhouse personnel

7. Prescription medication notification
8. Personal hygiene
9. Sanitation and safe food handling

~~10. Disciplinary ~~Action~~action~~  
10.

## K. Training

Towing vessel crewmembers must receive initial training and periodic refresher training in the following subjects, in addition to initial and refresher training required by regulation.

Unless required as a condition of licensure or otherwise prescribed by regulation, training courses need not be Coast Guard-approved.

The training identified below is intended to apply to any individual serving in the listed capacity aboard a towing vessel, regardless of license held. Training required as a condition of licensure (e.g., firefighting) may be used to satisfy the training specifications listed below.

1. Master (captain), relief captain, mate (pilot)
  - a) Radar training
  - b) Navigation and boat handling training or proficiency evaluation; Rules of the Road refresher training
  - c) Company policy and procedure orientation, including review of federal requirements and company policies
  - d) Marine firefighting and fire prevention
  - e) Personal safety, including:
    - 1) First aid and CPR awareness
    - 2) Confined space hazard awareness
    - 3) Injury prevention, including back training and slip, trip and fall prevention
    - 4) Fall overboard prevention
  - f) For tank barge tows:
    - 1) First responder, spill mitigation and emergency response orientation

(may include HAZWOPER training)

2) Benzene awareness training

g) Cargo knowledge and hazard awareness

h) Responsibility and authority of master; supervisory skills training

2. Engineer

a) Marine diesel school or in-house training, including equipment and process updates

b) Company policy and procedure orientation, including review of federal requirements and company policies

c) Marine firefighting and fire prevention

d) Personal safety, including:

1) First aid and CPR awareness

1) Confined space hazard awareness

1) Injury prevention, including back training and slip, trip and fall prevention

1) Fall overboard prevention

1) Lock-out/tag-out procedures

e) For tank barge tows:

1) First responder and spill mitigation training

3. Tankerman

a) Tank barge safety training

1) Loading and discharging operations

2) Safety practices

3) Environmental protection and loading procedures

4) Federal regulation review and training

5) First responder, spill mitigation and emergency response orientation  
(may include HAZWOPER training)

6) Vapor recovery operations

b) Company policy and procedure orientation, including review of federal requirements and company policies

c) Marine firefighting and fire prevention

- d) Personal safety, including:
  - 1) First aid and CPR awareness
  - 2) Confined space hazard awareness
  - 3) Injury prevention, including back training and slip, trip and fall prevention
  - 4) Fall overboard prevention
  - 5) Cargo-specific training
- e) Vessel communications system and procedures

4. Deck crew

(Note: Experienced deckhands new to a particular company should receive, or have received, the training identified below.)

- a) Deck operations and safety training
- b) Company policy and procedure orientation, including review of federal requirements and company policies
- c) Vessel firefighting and fire prevention
- d) Personal safety, including:
  - 1) First aid and CPR awareness
  - 2) Confined space hazard awareness
  - 3) Injury prevention, including back training and slip, trip and fall prevention
  - 4) Fall overboard prevention
  - 5) Lock-out/tag-out procedures
- e) For tank barge tows:
  - 1) First responder and spill mitigation training

5. Entry-level personnel

(Note: "Entry-level" refers to individuals new to the barge and towing industry.)

- a) Company orientation, including:
  - 1) Drug and alcohol policy
  - 1) Safety as a condition of employment
  - 3) Vessel layout and deck operations

- 4) Required safety gear
- 5) Job responsibilities

b) Emergency procedures orientation

- 1) Fire
- 2) Collision or allision
- 3) Sinking
- 4) Grounding
- 5) Man overboard
- 6) Personal injury

c) Confined space hazard awareness

d) Fall overboard prevention

e) Injury prevention, including back training and slip, trip and fall prevention

### ~~III. Equipment and Inspection (Inland)~~

#### ~~A. — Hull~~

~~Documentation of each inspection item listed below should be maintained for reporting or examination by appropriate company or third party personnel. (Note: annual inspection requirements are not intended to preclude routine walk through inspections conducted by vessel personnel. Such inspections are an important component of sound vessel maintenance and should be encouraged.)~~

~~Drydock period (routine hull inspection)~~

~~Recommended as needed; maximum 36 months~~

~~—~~

~~Watertight closures (doors, hatches, airports, windows, etc.)~~

~~If vessel has watertight closures, they should be inspected annually, with particular attention to main or freeboard deck closures.~~

~~Other openings (ventilators, air pipes, tank vents, etc.)~~

~~a) — Inspection annually for water or weather tightness and structural integrity~~

~~Rails, ladders, bulwarks, lighting, walking surfaces, chain guards, and handrails~~

~~Inspection annually for wastage, weakness, and personnel safety considerations  
Safety chains along outboard sides of main deck~~

~~Emergency walkways and hatchways~~

~~a) — Inspection annually~~

~~Piping systems and tanks~~

~~Piping diagrams should be kept aboard the vessel and piping systems identified by color coding, numbering, lettering, etc.  
Inspection annually~~

~~Freeing ports and scuppers (if applicable)~~

~~Survey and inspection annually while underway to note satisfactory drainage of main deck for seaworthiness~~

**~~B. Machinery~~**

~~Each company should develop a vessel maintenance program as outlined in the Management and Administration section of the AWO Responsible Carrier Program. At a minimum, this program should cover the following:-~~

~~Propulsion system (all major propulsion machinery, including engines, reduction gears, clutches, controls, shafting, bearings, and other items prone to wear)-~~

~~Steering system (all components)-~~

~~Miscellaneous auxiliary systems-~~

~~Electrical systems (should be labeled)-~~

~~Maintenance records should be kept on all systems identified above. Records should contain sufficient information to develop a program for overhauls, repairs, and preventative maintenance, and indicate part replacement dates and test dates. Logs should be kept indicating any maintenance or inspections performed.~~

~~Company maintenance procedures should include lock-out/tag-out.~~

~~Guards should be placed around any exposed moving parts (e.g., shafts, belts, pulleys, etc.)~~

~~Alarms and Gauges~~

~~-~~

~~Alarms-~~

~~Vessel should have the following alarms or have individuals assigned responsibility to monitor and document the following in accordance with company procedures:-~~

~~(1) Main engine water temperature-~~

~~(2) Main engine lube oil pressure-~~

~~(3) Bilge alarm-~~

~~(4) Generator water temperature-~~

~~(5) Generator lube oil pressure-~~

~~(6) Hydraulic steering fluid level-~~

~~In addition:-~~

~~(7) Vessel should have general alarm audible in all compartments. (46 CFR 27.201)-~~

~~(8) General alarm shall be tested weekly. Other alarms should be tested quarterly.-~~

~~b) Gauges-~~

~~Vessel should have the following gauges or have individuals assigned responsibility to monitor and document the following in accordance with company procedures:-~~

~~(1) Main engine water temperature-~~

~~(2) Main engine lube oil pressure-~~

~~(3) Generator water temperature-~~

~~(4) Generator lube oil pressure-~~

~~(5) Main engine tachometer-~~

~~(6) Hydraulic steering fluid level (sight glass)-~~



### **C. ~~Firefighting and Lifesaving Equipment~~**

~~A check-off report should be turned in or a log entry made at least quarterly verifying that the following required firefighting and lifesaving equipment is present and in proper working order:~~

- ~~1. Coast Guard approved life preservers (46 CFR 25.25-5)~~
- ~~2. Coast Guard approved ring buoy (46 CFR 25.25-5(d))~~
- ~~3. Coast Guard approved work vests (46 CFR 26.30-5) (46 CFR 26.30-10)~~

~~Coast Guard approved hand-portable fire extinguishers and semi-portable fire extinguishing systems (46 CFR 25.30)~~

~~Other equipment and items carried (and addressed in check-off report or log entry) should include the following:~~

- ~~5. Fire hydrants with hose and nozzle~~
- ~~6. Flare kits (if applicable)~~
- ~~7. Fire axe~~
- ~~8. First aid kit or trauma kit (properly stocked and maintained)~~
- ~~9. Smoke alarms to protect all accommodation spaces~~
- ~~10. Emergency lighting~~
- ~~11. Fire detection system to detect engine room fires (46 CFR 27.203)~~
- ~~12. Remote engine fuel shutoff valve (46 CFR 27.207)~~
- ~~13. Heat or flame detector in galley as required by regulation~~
- ~~14. Remote manual engine shutdown as required by regulation~~
- ~~15. Remote starter for fire pump as required by regulation~~
- ~~16. Posted safety notices, placards and warning signs as required by regulation~~
- ~~17. Placarded storage area appropriate for flammable products as required by regulation~~

### **D. ~~Navigation and Communication Equipment~~**

~~A check-off report should be turned in or a log entry made at least quarterly verifying that all required navigation and communication equipment is present and in proper working order:~~

1. ~~Copy of Navigation Rules (33 CFR 88.05)~~
2. ~~Radiotelephone log (where applicable) (47 CFR 80.405, 80.409(e) and (f))~~
3. ~~VHF radio (33 CFR 26.03)~~
4. ~~Valid FCC radio station license (47 CFR 80.25) posted near radio~~
5. ~~Navigation lights (33 USC 2023(a))~~
6. ~~Whistle and bell (33 CFR 86.05) (COLREGS Rule 33)~~
7. ~~Sound signal device (33 USC 2033(b)) (COLREGS Rule 33) Other equipment and items carried (and addressed in check off report or log entry) should include the following:~~
8. ~~Additional VHF radio capable of connection to battery backup~~
9. ~~Swing meter or magnetic compass, depending on area of operations (33 CFR 164.72(a)(4))~~
10. ~~Two radars (if only one radar is carried, need documented procedures to address radar failure) (one radar 33 CFR 164.72(a)(1))~~
11. ~~Navigation charts or maps (33 CFR 164.72(b)(1))~~
12. ~~Tide and Current Tables (where applicable) (33 CFR 164.72(b)(3))~~
13. ~~Coast Pilot (where applicable) (33 CFR 164.72(b)(3))~~
14. ~~Notice to Mariners (33 CFR 164.72(b)(3))~~
15. ~~Search light (33 CFR 164.72(a)(2))~~
16. ~~Defroster or de-icer (where applicable)~~
17. ~~VTS Manual (where applicable)~~
18. ~~Backup marine radio or telephone communications (33 CFR 164.72(a)(3))~~
19. ~~Loran or satellite navigation receiver (where applicable) (33 CFR 164.01, 33 CFR 164.41)~~
20. ~~Public address system and/or internal communication system as required by regulation~~

**~~E. Boat and Barge Rigging~~**

~~Each company operating inland towing vessels should:  
Establish documented procedures for safe use of wires, ropes, chains, shackles, ratchets, and winches~~

~~Identify minimum rigging requirements for each vessel according to service~~

~~Formulate an inspection and replacement program for rigging~~

~~Establish minimum specifications for each element of rigging~~

~~**F. Environmental Controls**~~

~~The following requirements are prescribed by regulation:~~

~~Fuel oil and bulk lubricating oil containment (33 CFR 155.320)~~

~~Bilge slop containment (33 CFR 155.330)~~

~~Oily water separator equipment (33 CFR 155.380) (where applicable)~~

~~Placard prohibiting discharge of oil (33 CFR 155.450)~~

~~MARPOL placard (33 CFR 151.59)~~

~~Certified marine sanitation device (33 CFR 159.7)~~

~~Fuel oil transfer procedures (33 CFR 155.720)~~

~~In addition, each towing vessel should have the following:~~

~~Oil spill contingency plan outlining procedures to be followed in the event of a fuel spill from the towing vessel~~

~~Containment around fueling stations~~

~~Spill kit~~

#### **IV. ~~Equipment and Inspection (Coastal)~~**

##### **Hull**

~~-~~

~~Documentation of each inspection item listed below should be maintained for reporting or examination by appropriate company or third party personnel. (Note: Annual inspection requirements are not intended to preclude routine walk-through inspections conducted by vessel personnel. Such inspections are an important component of sound vessel maintenance and should be encouraged.)~~

##### ~~1. ~~Drydock period (routine hull inspection)~~~~

~~a) ~~If vessel has watertight closures, they should be inspected annually, with particular attention to main or freeboard deck closures.~~~~

##### ~~4. ~~Other openings (ventilators, air pipes, tank vents, etc.)~~~~

~~a) ~~Inspection annually for water or weather tightness and structural integrity~~~~

##### ~~5. ~~Rails, ladders, bulwarks, lighting, walking surfaces, chain guards, and handrails~~~~

~~a) ~~Inspection annually for wastage, weakness, and personnel safety considerations~~~~

##### ~~6. ~~Emergency walkways and hatchways~~~~

~~a) ~~Inspection annually~~~~

##### ~~7. ~~Freeing ports and scuppers~~~~

~~a) ~~Survey and inspection annually while at sea to note satisfactory drainage of main deck for seaworthiness~~~~

##### ~~Piping systems and tanks~~

~~a) ~~Piping diagrams should be kept aboard the vessel and piping systems identified by color-coding, numbering, lettering, etc.~~~~

~~b) ~~Inspection annually~~~~

##### **B. ~~Machinery~~**

~~1. ~~Each company should develop a vessel maintenance program as outlined in the Management and Administration section of the AWO Responsible Carrier Program. At a minimum, this program should cover the following:~~~~

- a) ~~Propulsion system (all major propulsion machinery, including engines, reduction gears, clutches, controls, shafting, bearings, and other items prone to wear)~~
- b) ~~Steering system (all components)~~

e) ~~Miscellaneous auxiliary systems~~

d) ~~Electrical systems (should be labeled)~~

2. ~~Maintenance records should be kept on all systems identified above. Records should contain sufficient information to develop a program for overhauls, repairs, and preventative maintenance, and indicate part replacement dates and test dates. Logs should be kept indicating any maintenance or inspections performed.~~

3. ~~Company maintenance procedures should include lock out/tag out.~~

4. ~~Guards should be placed around any exposed moving parts (e.g., shafts, belts, pulleys, etc.).~~

5. ~~Alarms and Gauges~~

a) ~~Alarms~~

~~Vessel should have the following alarms or have individuals assigned responsibility to monitor and document the following in accordance with company procedures:~~

- (1) ~~Main engine water temperature~~
- (2) ~~Main engine lube oil pressure~~
- (3) ~~Bilge alarm~~
- (4) ~~Generator water temperature~~
- (5) ~~Generator lube oil pressure~~
- (6) ~~Hydraulic steering fluid level~~

~~In addition:~~

(7) ~~Vessel should have general alarm audible in all compartments (46 CFR 27.201)~~

(8) ~~General alarm shall be tested weekly. Other alarms should be tested quarterly.~~

b) ~~Gauges~~

~~Vessel should have the following gauges or have individuals assigned responsibility to monitor and document the following in accordance with company procedures:~~

- (1) ~~Main engine water temperature~~
- (2) ~~Main engine lube oil pressure~~
- (3) ~~Generator water temperature~~
- (4) ~~Generator lube oil pressure~~
- (5) ~~Main engine tachometer~~
- (6) ~~Hydraulic steering fluid level (sight glass)~~

### ~~C. — Firefighting and Lifesaving Equipment~~

~~A check-off report should be turned in or a log entry made at least quarterly verifying that the following required firefighting and lifesaving equipment is present and in proper working order:~~

- ~~1. — Coast Guard approved life preservers (46 CFR 25.25-5)~~
- ~~2. — Coast Guard approved ring buoy (46 CFR 25.25-5(d))~~
- ~~3. — Coast Guard approved work vests (46 CFR 26.30-5) (46 CFR 26.30-10)~~
- ~~4. — Coast Guard approved hand-portable fire extinguishers and semi-portable fire-extinguishing systems (46 CFR 25.30)~~  
~~Other equipment and items carried (and addressed in check-off report or log entry) should include the following:~~
- ~~5. — Inflatable life raft~~
- ~~6. — Fire hydrants with hose and nozzle~~
- ~~7. — Flare kits~~
- ~~8. — Fire axe~~
- ~~9. — First aid kit or trauma kit (properly stocked and maintained)~~
- ~~10. — Smoke alarms installed to protect all accommodation spaces~~
- ~~11. — Emergency lighting~~
- ~~12. — Survival suits for each person on board (where applicable)~~
- ~~13. — Fire detection system to detect engine room fires (46 CFR 27.203)~~
- ~~14. — Remote engine fuel shutoff valve (46 CFR 27.207)~~
- ~~15. — Heat or flame detector in galley as required by regulation~~
- ~~16. — Remote manual engine shutdown as required by regulation~~
- ~~17. — Remote starter for fire pump as required by regulation~~
- ~~18. — Posted safety notices, placards and warning signs as required by regulation~~
- ~~19. — Placarded storage area appropriate for flammable products as required by regulation~~
- ~~20. — Externally activated fire extinguishers in engine room as required by regulation~~

## ~~D. — Navigation and Communication Equipment~~

~~A check-off report should be turned in or a log entry made at least quarterly verifying that all required navigation and communication equipment is present and in proper working order:—~~

- ~~1. — Copy of navigation rules (33 CFR 88.05)—~~
- ~~2. — Radiotelephone log (47 CFR 80.405, 80.409(e) and (f))—~~
- ~~3. — VHF radio (33 CFR 26.03)—~~
- ~~4. — Valid FCC radio station license (47 CFR 80.25) posted near radio—~~
- ~~5. — Navigation lights (33 USC 2023(a))—~~
- ~~6. — Whistle and bell (33 CFR 86.05) (COLREGS Rule 33)—~~
- ~~7. — Sound signal device (33 USC 2033(b)) (COLREGS Rule 33)—~~

~~Emergency position indicating radio beacon (EPIRB) (46 CFR 25.26)—~~

~~Other equipment/items carried (and addressed in check-off report or log entry) should include the following:—~~

- ~~9. — Additional VHF radio capable of connection to battery backup—~~
- ~~10. — Magnetic compass and backup means of determining course and direction (gyrocompass for oceangoing tugs as required by regulation) (33 CFR 164.72(a)(4))—~~
- ~~11. — Two radars (if only one radar is carried, need documented procedures to address radar failure) (one radar 33 CFR 164.72(a)(1))—~~
- ~~12. — Fathometer—~~
- ~~13. — LORAN or GPS (33 CFR 164.72(a)(6))—~~
- ~~14. — Navigation charts (33 CFR 164.72(b)(1))—~~
- ~~15. — Tide and Current Tables (33 CFR 164.72(b)(3))—~~
- ~~16. — Coast Pilot (33 CFR 164.72(b)(3))—~~
- ~~17. — Light List—~~
- ~~18. — Notice to Mariners (33 CFR 164.72(b)(3))—~~
- ~~19. — Search light (33 CFR 164.72(a)(2))—~~

- ~~20. Rudder angle indicator~~
- ~~21. Defroster or de-icer (where applicable)~~
- ~~22. VTS Manual (where applicable)~~
- ~~23. Backup marine radio or telephone communications (33 CFR 164.72(a)(3))~~
- ~~24. Public address system and/or internal communication system as required by regulation~~

**~~E. Towing Gear~~**

~~1. Tow wire and towing hawser~~

~~a) General guidelines for sizing tow wires/towing hawsers~~

~~(1) The minimum nominal breaking strength of the tow wire/towing hawser should be 2.5 times the certified or calculated bollard pull of the tug. The static bollard pull of the tug should be determined by a static bollard pull test certified by the American Bureau of Shipping or other competent organization, or calculated using the engine manufacturer's rated brake horsepower (BHP) at the maximum engine rpm times the factor 27.5 pounds per BHP.~~

~~(2) The following minimum size tow wire/towing hawser is recommended for use with tugs of the horsepower indicated. (Note: the horsepower and diameter ranges listed are intended to serve as ranges only. A tug at the low end of a given horsepower range does not necessarily require a towing hawser sized at the low end of the diameter range, nor does a vessel at the high end of a given horsepower range necessarily require a towing hawser sized at the high end of the diameter range.)~~

~~(a) <1000 hp: 1" diameter; breaking strength 35 tons~~

~~(b) 1000-1500 hp: 1" - 1.125" diameter; breaking strength 46 tons~~

~~(c) 1500-2000 hp: 1" - 1.25" diameter; breaking strength 68 tons~~

~~(d) 2000-2500 hp: 1.25" - 1.50" diameter; breaking strength 86 tons~~

~~(e) 2500-3000 hp: 1.50" - 1.75" diameter; breaking strength 103 tons~~

~~(f) 3000-4000 hp: 1.75" - 2" diameter; breaking strength 137 tons~~

~~(g) 4000-5000 hp: 2" - 2.25" diameter; breaking strength 172 tons~~

~~(h) 5000-7000 hp: 2.125" - 2.50" diameter; breaking strength 245 tons~~

~~(i) 7000-10,000 hp: Special consideration (e.g., certified bollard pull/tow wire match or dual tow wire arrangement)~~

~~b) Specifications~~

~~(1) Tow wires should have independent wire rope cores (IWRC).~~

~~(2) Tow wires should be of improved plow steel or extra improved plow steel.~~

~~(3) Tow wires should be heavy lubricated or galvanized at the time of manufacture.~~

~~(4) Tow wires should be 6 x 19 or larger (more flexible).~~

~~(5) Soft lines used in ocean towing should be rated at 2.5 times the certified or calculated bollard pull of the tug.~~



~~(6) — The breaking strength of the wire rope or towing hawser should be certified by the manufacturer by pull testing to destruction a portion of wire from the mill run from which it originated.—~~

~~e) — Terminations—~~

~~The towing end of the tow wire should terminate in a spelter or thermo-set resin poured socket, or a spliced eye with thimble, and should be sized to exceed the breaking strength of the tow wire.—~~

~~2. — Bridles and surge gear (if used)—~~

~~a) — Bridles for ocean towing—~~

~~(1) — Connections to the barge should be by a two-legged bridle.—~~

~~(2) — The breaking strength of each leg should be at least 1.3 times that of the minimum required breaking strength of the main towing hawser.—~~

~~(3) — Bridles should be Grade 2 or higher welded or forged integral stud link chain or IWRC wire rope.—~~

~~b) Surge gear (if used)—~~

~~(1) — Surge chains should be Grade 2 or higher welded or forged integral stud link chain.—~~

~~(2) — Surge chains should be of the same grade and type and at least as large as that in the towing bridle.—~~

~~(3) — Each end of the chain may have an end link or one studless link.—~~

~~(4) — A synthetic shock line may be used as surge gear if rated at 1.3 times the breaking strength specified for the primary tow wire or towing hawser [See 1.a)(1) above].—~~

~~3. — Associated towing gear—~~

~~All associated towing gear (e.g., shackles, flounder and/or fish plates, shock hawser, and pennant) should be sufficiently sized for its intended use and should have a breaking strength of not less than 1.3 times the breaking strength specified for the primary tow line [See 1.a)(1) above].—~~

~~4. — Chafing protection—~~

~~a) — Protection from chafing should be provided at points where the wire rope hawser passes over the stern bullrail or around a surface that may cause wear on the hawser during normal towing operations.—~~

~~b) — Any wear points on the vessel or associated equipment contacted by wire rope as it travels during operation should be kept ground smooth. Sources of sharp bending by deformation of the surface should be eliminated or not introduced.—~~

~~5. — Emergency towing gear—~~

~~All components of the emergency towing system should be rated with a breaking strength equal to 1.5 times the rated bollard pull of the towing vessel. Each tug or barge should be equipped with an emergency recovery system.—~~

~~(Note: 33 CFR 155.230 requires that all offshore (i.e., coastal or ocean) oil barges carry an emergency tow wire or tow line, rigged and ready for use. The emergency tow wire or tow line must have the same towing characteristics, but not necessarily the same physical characteristics, as the primary tow wire or tow line. The Coast Guard has advised AWO that tow line features—such as size, breaking strength, etc., are considered physical, not towing, characteristics. Hence, according to the Coast Guard, carrying an emergency tow line with a breaking strength equal to 1.5 times the rated bollard pull of the towing vessel, while the breaking strength of the primary tow line is equal to 2.5 times the rated bollard pull, as specified in 1.a)(1) above, is not inconsistent with the requirements of 33 CFR 155.230.~~

~~6. — Wire rope records, inspection, and maintenance—  
Each company should develop a program to address inspection, maintenance, and replacement criteria for wire rope and synthetic hawsers used in the tow line assembly. As a minimum, the wire rope program should be consistent with the recommendations outlined in Coast Guard Navigation and Vessel Inspection Circular (NVIC) 5-92.~~

#### ~~F. — Environmental Controls—~~

~~The following requirements are prescribed by regulation:—  
Fuel oil and bulk lubricating oil containment (33 CFR 155.320)—~~

~~Bilge slop containment (33 CFR 155.330)—~~

~~Oily water separator equipment (33 CFR 155.380)—~~

~~Placard prohibiting discharge of oil (33 CFR 155.450)—~~

~~MARPOL placard (33 CFR 151.59)—~~

~~Certified marine sanitation device (33 CFR 159.7)—~~

~~Fuel oil transfer procedures (33 CFR 155.720)—~~

~~In addition, each towing vessel should have the following:—~~

~~Oil spill contingency plan outlining procedures to be followed in the event of a fuel spill from the towing vessel—~~

~~Containment around fueling stations—~~

### **V. Human Factors**

#### **A. — Manning**

~~—~~

~~1. — All towing companies should man their vessels for safe operation, taking into account—~~

~~the following criteria:~~

~~Applicable law and regulation~~

~~Number, size, and type of barges to be towed~~

~~Towing route~~

~~Safety of personnel, equipment, environment~~

~~Service in which tow is engaged~~

~~Functional duties required of crew in addition to standard navigation~~

~~Configuration of vessel superstructure and deck and engine room~~

~~Extent of automation~~

~~Size and power of equipment used~~

~~Environmental and climatic conditions (e.g., icing)~~

~~Experience of crew~~

~~2. — Except in an emergency, at least one qualified wheelhouse person and one additional crewmember should be on duty at all times while the vessel is underway.~~

## **~~B. — Watchstanding and Work Hours~~**

~~Except as otherwise provided (such as 46 USC 8104(e) );(46 USC 8104(h)) provides that "an individual licensed to operate a towing vessel may not work for more than 12 hours in a consecutive 24 hour period except in an emergency."~~

~~All other crewmembers on a towing vessel should not be permitted to work more than 15 hours in any 24 hour period or more than 42 hours in a 72 hour period, except in an emergency or drill.~~

## **~~C. — Training~~**

~~Towing vessel crewmembers should receive initial training and periodic refresher training in the following subjects. Refresher training should be conducted in accordance with company policy, but no less frequently than once every five years.~~

~~Unless required as a condition of licensure or otherwise prescribed by regulation, training courses need not be Coast Guard approved.~~

~~The training identified below is intended to apply to any individual serving in the listed capacity aboard a towing vessel, regardless of license held. Training required as a condition of~~

~~licensure (e.g., firefighting) may be used to satisfy the training specifications listed below.~~

~~1. Master (captain), relief captain, mate (pilot)~~

~~a) Radar training~~

~~b) Navigation and boat handling training or proficiency evaluation; Rules of the Road refresher training~~

~~-~~

~~c) Company policy and procedure orientation, including review of federal requirements and company policies~~

~~d) Marine firefighting and fire prevention~~

~~e) Personal safety, including:~~

~~(1) First aid and CPR awareness~~

~~(2) Confined space hazard awareness~~

~~(3) Injury prevention, including back training and slip, trip and fall prevention~~

~~(4) Fall overboard prevention~~

~~f) For tank barge tows:~~

~~(1) First responder, spill mitigation and emergency response orientation (may include HAZWOPER training)~~

~~(2) Benzene awareness training~~

~~g) Cargo knowledge and hazard awareness~~

~~h) Responsibility and authority of master; supervisory skills training~~

~~2. Engineer~~

~~a) Marine diesel school or in-house training, including equipment and process updates~~

~~b) Company policy and procedure orientation, including review of federal requirements and company policies~~

~~c) Marine firefighting and fire prevention~~

~~d) Personal safety, including:~~

~~(1) First aid and CPR awareness~~

~~(2) Confined space hazard awareness~~

~~(3) Injury prevention, including back training and slip, trip and fall prevention~~

~~(4) Fall overboard prevention~~

~~(5) Lock-out/tag-out procedures~~

~~e) For tank barge tows:~~

~~(1) First responder and spill mitigation training~~

~~3. Tankerman~~

- ~~a) Tank barge safety training~~
  - ~~(1) Loading and discharging operations~~
  - ~~(2) Safety practices~~
  - ~~(3) Environmental protection and loading procedures~~
  - ~~(4) Federal regulation review and training~~
  - ~~(5) First responder, spill mitigation and emergency response orientation (may include HAZWOPER training)~~
  - ~~(6) Vapor recovery operations~~

- ~~b) Company policy and procedure orientation, including review of federal requirements and company policies~~
  - ~~(3) Injury prevention, including back training and slip, trip and fall prevention~~
  - ~~(4) Fall overboard prevention~~
  - ~~(5) Cargo specific training~~

- ~~e) Vessel communications system and procedures~~
- ~~4. Deck crew~~

~~(Note: Experienced deckhands new to a particular company should receive, or have received, the training identified below.)~~

- ~~a) Deck operations and safety training~~

- ~~b) Company policy and procedure orientation, including review of federal requirements and company policies~~

- ~~e) Vessel firefighting and fire prevention~~

- ~~d) Personal safety, including:~~

- ~~(1) First aid and CPR awareness~~
- ~~(2) Confined space hazard awareness~~
- ~~(3) Injury prevention, including back training and slip, trip and fall prevention~~
- ~~(4) Fall overboard prevention~~
- ~~(5) Lock out/tag out procedures~~
- ~~e) For tank barge tows:~~

- ~~(1) First responder and spill mitigation training~~
- ~~5. Entry level personnel~~

~~(Note: "Entry level" refers to individuals new to the barge and towing industry.)~~

- ~~a) Company orientation, including:~~

- ~~(1) Drug and alcohol policy~~
- ~~(2) Safety as a condition of employment~~
- ~~(3) Vessel layout and deck operations~~
- ~~(4) Required safety gear~~

- ~~(5) — Job responsibilities~~
- ~~b) — Emergency procedures orientation~~
  - ~~(1) — Fire~~
  - ~~(2) — Collision or allision~~
  - ~~(3) — Sinking~~
  - ~~(4) — Grounding~~
  - ~~(5) — Man overboard~~
  - ~~(6) — Personal injury~~
- ~~e) — Confined space hazard awareness~~
- ~~d) — Fall overboard prevention~~
- ~~e) — Injury prevention, including back training and slip, trip and fall prevention~~

### III. Introduction to Addenda

The following addenda section has been created to assist member companies, auditors and others by providing a comprehensive resource that contains relevant information on the significant policies, procedures and clarifications that govern the Responsible Carrier Program (RCP), RCP Standards Board, RCP auditors, and AWO-recognized third party organizations.

The addenda are organized into six parts:

- A. Dispute Resolution Policy
- B. Audit Certification/Recertification Protocol
- C. Audit Issues
- D. Auditor Issues
- E. Standards Board
- F. AWO-Recognized Third Party Organizations
- G. Terminology Reference Guide

## Addendum A. Dispute Resolution Policy

1. Disputes between a Responsible Carrier Program (RCP) auditor certified by an AWO-recognized ~~auditor training and certification~~ third party organization and an AWO member concerning the meaning, interpretation or application of the RCP ~~will~~ should be resolved according to the dispute resolution and appeal process ~~policy and procedures~~ outlined in paragraphs ~~454~~ through ~~98~~ below.
2. Disputes between an RCP auditor certified by an AWO-recognized ~~auditor training and certification~~ third party organization and an AWO member concerning the RCP audit process ~~will~~ must be resolved first by a mediation within 30 days of the noted dispute, conducted by the AWO-recognized ~~auditor training and certification~~ third party organization that trained and certified the auditor. If ~~an~~ agreement ~~resolution~~ cannot be reached, then the two parties may utilize the dispute resolution and appeal process outlined in ~~paragraphs-sections~~ 454 through 98 below.
3. AWO ~~will have no~~ does not have a role in resolving disputes between RCP auditors and AWO-recognized ~~auditor training and certification~~ third party organizations.
- 3.4.4. The AWO member or RCP auditor certified by an AWO-recognized ~~auditor training and certification~~ third party organization requesting a dispute resolution ~~shall~~ must notify the AWO Safety & Environmental Stewardship Department, in writing, of the details of the dispute within 30 days of it becoming clear that agreement between the parties cannot be reached. ~~The AWO Safety Department may, at its discretion, accept or deny dispute resolution requests submitted beyond the 30-day period.~~
  - a) Upon receipt of a dispute resolution request, a representative of the AWO Safety & Environmental Stewardship Department ~~will~~ must contact the party requesting the dispute resolution, request any additional written description of the facts that may be needed, and provide an overview of the dispute resolution process, including the parties' right to communicate directly to the RCP Standards Board in writing or in person at its next meeting.
  - b) Upon receipt of all relevant paperwork, the AWO Safety & Environmental Stewardship Department ~~will~~ must forward copies to all members of the RCP Standards Board.
  - ~~b) c)~~ The RCP Standards Board may, at its discretion ~~under the circumstances,~~ grant an AWO member that is a party in a dispute resolution an extension of an impending audit due date until the dispute is resolved. After the dispute is resolved, the initial due date serves as the date for calculating future RCP certification/recertification dates. Any extension of an audit due date does not change an AWO member's obligation to conduct audits in the timeframes ~~dates as~~ required by regulation under 46 CFR Subchapter M.



4.5. The RCP Standards Board ~~will~~ should meet by conference call or in person to discuss the issue(s) in dispute, interview all the parties involved, and make a decision based on its best judgment.

5.6. The AWO Safety & Environmental Stewardship Department ~~will~~ must notify in writing the party requesting the dispute resolution, communicating the RCP Standards Board's decision and advising the party that he/she may appeal the Standards Board's decision to the AWO Executive Committee. ~~The AWO Safety Department is responsible for maintaining RCP Standards Board dispute resolution rulings, and issuing copies to affected parties. RCP Standards Board rulings may be used as interpretive guidance to assist AWO members and RCP auditors in reaching agreement to avoid future disputes resolutions.~~

6.7.7. Any party wishing to appeal a decision of the RCP Standards Board to the AWO Executive Committee must notify the AWO Safety & Environmental Stewardship Department of its request to appeal within 15 days of receiving notification of the RCP Standards Board's ruling.

- a) The AWO Safety & Environmental Stewardship Department ~~will~~ must provide the AWO Executive Committee with all background materials relating to the request for dispute resolution and the RCP Standards Board's decision in the Executive Committee packet prior to its next meeting.
- b) Within 30 days following receipt of an appeal, the AWO Executive Committee ~~will~~ must discuss the dispute and render a decision.
- c) The AWO Safety & Environmental Stewardship Department ~~will~~ must notify all parties involved of the AWO Executive Committee's decision.
- d) The party originally submitting the request for a dispute resolution may accept the AWO Executive Committee's decision or proceed to the AWO Board of Directors for a final resolution.

7.8.8. Any party wishing to proceed to the AWO Board of Directors for a final resolution ~~must will~~ notify the AWO Safety & Environmental Stewardship Department within seven days of notification of the AWO Executive Committee's decision.

- a) The AWO Safety & Environmental Stewardship Department ~~will~~ must provide the AWO Board of Directors with all background materials relating to the request for dispute resolution and the AWO Executive Committee's decision in the Board packet prior to its next meeting.
- b) At its first meeting following receipt of an appeal, the AWO Board of Directors ~~will~~ must discuss the dispute and render a final decision.

~~8.~~9. Nothing in this addendum should be construed to constrain the ability of an AWO member directly affected by a decision or action taken under 46 CFR Subchapter M by a third party organization on behalf of the Coast Guard, including the conduct of audits and surveys, to appeal in accordance with 46 CFR 1.03. [See 46 CFR 136.180]

## Addendum B. RCP Audit Certification/Recertification Protocol

1. Responsible Carrier Program (RCP) c Certification/recertification audits must be conducted by an auditor who is certified by an AWO-recognized ~~auditor training and certification~~ third-party organization and are due on the anniversary date of the acceptance of the company's AWO new member application, or for companies joining AWO prior to January 1, 2000, the anniversary date of the completion of its initial audit.
  - a) Seasonal operators whose equipment does not operate for a portion of the year may request an adjustment of their RCP audit due date to allow for the completion of their audit at a time when the equipment is manned and active. A request for seasonal adjustment of the audit due date must be made during the AWO new member initial application process.
  - b) Any change to the RCP certification/recertification audit due date for established ~~AWO~~ AWO members ~~will be~~ is on a one-time basis as determined by operational necessity, such as a change in operating area or business profile. All requests for a change in audit due date must be made in writing and approved by the ~~Responsible Carrier Program~~ RCP Standards Board at least 90 days prior to the existing audit due date.
2. Companies joining AWO after November 1, 2008, that cannot show documentary evidence of third party audited full compliance with a recognized safety management system for at least 12 months prior to their new member application must successfully complete ~~an~~ Responsible Carrier Program management audit RCP external management audit and ~~an~~ audits of at least ten percent (10%)<sup>1</sup> of ~~their~~ its vessels conducted by an ~~RCP~~ auditor or auditors certified by an AWO-recognized ~~auditor training and certification~~ third-party organization no later than the first anniversary of the acceptance of the company's application, and two (2) additional RCP external management -audits, including at least ten percent (10%) of vessels for each audit, by the second and third anniversaries of membership. To complete this audit, a company must show 90 days of documentary evidence of compliance with the requirements of the RCP. The company must complete ~~vessel~~ audits on one- hundred percent (100%) of its vessels no later than the fifth anniversary of the acceptance of the company's application ~~by five (5) years from its join date~~. A company ~~will remain~~ is in provisional status until the completion of its second RCP external management audit during the ~~is~~ initial three (3)-year cycle. Failure to complete any required RCP audits by their due date results in a company's termination of their company's AWO membership. ~~Members that fail to complete any of the required audits by their due date will have their membership terminated.~~
3. A company that presents documentary evidence of third party audited compliance full ~~compliance~~ with a recognized safety management system for at least 12 months prior to its

<sup>1</sup> For RCP audit purposes, a company's ~~The vessel~~ fleet is comprised of all equipment towing vessels owned, operated, managed, and chartered in as of the recording date, whether idle or not, except for fully decommissioned vessels.

new member application ~~must~~ undergo an RCP external management audit ~~Responsible Carrier Program management audit~~ and ~~vessel~~-audits of at least ten percent (10%) of its vessels, conducted by an ~~RCP~~-auditor or auditors certified by an AWO-recognized ~~auditor training and certification~~ third-party organization, at any time during its first year of membership, but no later than the first anniversary of the acceptance of its application for membership. A company is no longer in provisional status upon the successful completion of the audits required in this paragraph. ~~Upon successful completion of this audit, the company will no longer be in provisional status.~~

4. Effective May 1, 2009, any company reapplying for AWO membership must show evidence of having completed an ~~RCP management audit~~ RCP external management audit and ~~vessel~~-audits of at least ten percent (10%) of its vessels prior to submitting its membership application. To complete this audit, ~~a company~~ ies will be ~~required~~ must to show 90 days of documentary evidence of compliance with the requirements of the RCP.
5. Once an AWO member company has completed the first RCP audit cycle as discussed in ~~paragraphs items 21 or 32~~ paragraphs items 21 or 32 above, ~~Responsible Carrier Program~~ recertification audits are due every five (5) years on the anniversary date of the company's join date, with a mid-period ~~management audit~~ external management audit to be conducted between 27 and 33 months from the recertification date. ~~In addition, o~~ One- hundred percent (100%) of a company's vessels must be audited within the five (5)-year period ~~as well~~. AWO ~~should~~ will notify member companies 180, 90, and 30 days prior to the due date for their recertification audit, 90 days before the beginning of the mid-period audit window, and 30 days before the end of the mid-period window. [See Addendum C.3]
6. A company certified under the International Safety Management (ISM) Code, to be eligible for AWO membership, must include in its ~~S~~ safety ~~M~~ management ~~S~~ system all requirements unique to the RCP. This must be verified through the annual third-party Document of Compliance (DOC) audit.
  - a) A company wishing to use ISM Code compliance ~~ISM compliance~~ to meet AWO's requirement that all members of the association must have a safety management system must send a letter to the AWO Safety & Environmental Stewardship Department stating that the company is operating in full compliance with all requirements of the ISM Code and certifying that its safety management system includes all requirements unique to the ~~Responsible Carrier Program RCP~~. If some portion of the company's fleet is not certified under the ISM Code ~~certified~~, the letter must identify the number of vessels ~~not covered under ISM Code~~ that do not maintain Safety Management Certificates and that are ~~and~~ subject to the RCP -audit requirement per ~~item~~ paragraph (b) below. In addition, to demonstrate continued compliance with the ISM Code, a company using this option must provide AWO with a copy of its ISM Document of Compliance (DOC) following its annual ~~ly~~ verification audit. AWO ~~should~~ will enter this information in its database and remind companies of the due date of their five (5)-year renewal audit.

- b) For companies participating in ISM whose entire fleet is not required to maintain Safety Management Certificates, ~~100~~one hundred percent (100%) of those vessels without an ~~ISM~~-Safety Management Certificate must undergo an RCP external ~~n-RCP~~-vessel audit ~~using the appropriate Responsible Carrier Program CP vessel audit checklist~~ at least once every five (5) years.
7. Failure of a company to complete ~~its-a~~ required RCP audit within the time allowed results in ~~the~~AWO immediately ~~revocation~~moving of the company's certification of RCP compliance and ~~will result in~~ termination of AWO membership by AWO.
8. An RCP-certified company completing a required RCP recertification audit up to 90 days prior to its audit due date ~~will~~retains that due date even if it results in more than five (5) years between recertification audits.
9. An AWO member company in Provisional Mmember status that completes its initial RCP audit before the date of its first anniversary of membership ~~will~~maintains the date of its anniversary of membership as its due date.
10. When a company has completed an RCP recertification or mid-period ~~management audit~~external management audit (that is, when an approved auditor certified by an AWO-recognized ~~auditor training and certification~~third-party organization has determined that the company is in full compliance with the RCP~~Responsible Carrier Program~~ program, including documentation of compliance with vessel audit requirements), the auditor ~~must~~ should immediatelymust immediately notify (via letter or by other means) ~~send a letter to~~ the AWO-recognized ~~auditor training and certification~~third-party organization that ~~trained and~~ certified the auditor -[See Addendum C.17] certifying that the company is in full compliance with the ~~program~~RCP~~Responsible Carrier Program~~ as of the time and date the audit was completed. The ~~AWO-recognized auditor training and certifying organization~~ third party organization~~TPO~~ ~~must~~will then forward the letter to the AWO Safety & Environmental Stewardship Department within ~~two-two~~ (2) business days. Upon receipt of notification of completion of a member's RCP ~~annual~~certification or recertification audit, AWO ~~should~~will issue a new ~~audit~~RCP certificate valid for the appropriate time period. Successful completion of the mid-period RCP ~~management audit~~external management audit ~~should~~will be noted in the company's record in the AWO database, but a new RCP certificate ~~should~~will not be issued.
11. When a company has completed an RCP vessel audit or audits, the auditor ~~must~~ should immediately ~~send a letter to~~notify (by letter or by other means) the AWO-recognized ~~auditor training and certification~~third-party organization that ~~trained and~~ certified the auditor [See Addendum C.17] certifying that the vessel or vessels is/are in full compliance with the RCP~~Responsible Carrier Program~~ as of the time and date the audit was completed. The AWO-recognized third-party ~~auditor training and certifying~~ organization ~~must~~will maintain a record of these letters, ~~but they need not~~and must ~~notify~~forward notification results to AWO only that the vessel audit is complete ~~unless a vessel fails to successfully complete the audit~~. The auditor and AWO-recognized third-party organization should not forward audit results or details to AWO, unless specifically requested by the member

company for usage by the RCP Standards Board during a dispute resolution process governed by Addendum A.:

- a) ~~A company may initiate vessel audits when it chooses; however, o~~ Once an a vessel audit is initiated (~~as~~ defined as the auditor accessing the vessel), ~~then~~ it must be completed or in progress within 90 days of the vessel's audit anniversary date.: An AWO member company no longer ~~subject in to~~ provisional status shall have a minimum of ten percent (10%) of its fleet audited each year during the its five-year certification cycle.
- b) If a vessel is unable to successfully complete an audit within the ~~given time frame allowed,~~ it must be taken out of service ~~until such time as~~ until it can be brought into compliance, ~~in order for~~ in order for the company to remain in compliance with the RCP Responsible Carrier Program. If a vessel fails to pass its vessel audit, the auditor must immediately ~~send a letter to~~ notify the AWO-recognized ~~auditor training and certification~~ third-party organization that ~~trained and~~ certified the auditor [See Addendum C.17] noting that the vessel or vessels is/are not in compliance with the Responsible Carrier Program RCP as of the time and date the audit was completed. The AWO-recognized ~~third party auditor training and certifying~~ organization ~~must will~~ notify the AWO Safety & Environmental Stewardship Department immediately.
- b)c) Vessels that have undergone long-term maintenance or ~~overall~~ overhaul- that results in the vessel being out of service at the scheduled audit date, must be audited before returning to service, thus establishing a new RCP vessel audit anniversary date.

12. The RCP Responsible Carrier Program-Standards Board may grant a limited extension of time beyond an AWO member company's RCP audit due ~~date~~ only to allow the member company to correct equipment deficiencies necessary to complete its RCP-audit, resolve a dispute pursuant to Addendum A, or in certain extraordinary circumstances such as severe weather, earthquake, or other acts of God, ~~provided that~~ if AWO:

- a) Receives a written (hard copy or email) request not less than two (2) weeks prior to the audit due date from the member company's CEO or chief operating officer, explaining in detail the circumstances and/or conditions surrounding the request.
- b) -Receives written (hard copy or email) confirmation from the company's ~~certified RCP~~ auditor, via the AWO-recognized ~~auditor training and certification~~ third-party organization that ~~trained and~~ certified the auditor, that the audit has been conducted and the company ~~will is~~ be able to complete the outstanding issues immediately.
- c) The granting of an extension to correct deficiencies does not ~~in no way~~ changes the original audit due date for future audits ~~moving forward.~~

13. ~~13. AWO-recognized third party organizations must notify AWO when entering into a contract with a company to scheduling RCP external management and/or vessel RCP audit services. ~~conduct any audit services.~~~~

## Addendum C. RCP Audit Issues

1. AWO ~~members required to participate in the Responsible Carrier Program, and any AWO affiliate members participating in the RCP, will have their membership status and RCP audit due date posted on the AWO website.~~ Membership status is ~~will be~~ classified as follows:
  - a) Provisional Member – Companies that have been members of AWO for less than ~~two~~two (2) years and have not yet completed their first ~~two~~two (2) RCP external management ~~RCP~~ audits. A new member that presents documentary evidence of full compliance with a recognized safety management system for at least 12 months prior to its new member application is ~~will be~~ considered a provisional member until completion of its first RCP external management audit.
  - b) Responsible Carrier Program (RCP) ~~CP~~ Certified Member – Companies that have successfully completed an current RCP ~~Responsible Carrier Program~~ audit conducted by an RCP auditor who is certified by an AWO-recognized ~~auditor training and certification~~ third- party organization.
2. Any AWO carrier member company (RCP-Certified Member) that resigns its membership or has its membership withdrawn after April 1, 1998, must, before rejoining the association, show satisfactory documentary evidence of having completed an full RCP external management audit that includes documentary evidence of 90 days of RCP RCP compliance conducted by an RCP auditor who is certified by an AWO-recognized ~~auditor training and certification~~ third- party organization no more than 30 days prior to the date of its ~~Carrier Member~~ application for reinstatement. The RCP auditor must immediately send ~~Notification of completion of the audit should be immediately sent~~ to the AWO-recognized ~~auditor training and certification~~ third- party organization that ~~trained and~~ certified the auditor. The third- party organization must ~~will then~~ forward the certification of compliance to the AWO ~~Safety Department~~ Safety & Environmental Stewardship Department to ensure final consideration of the company's application for reinstatement. ~~within two business days of receipt.~~
3. The mid-period management audit must be conducted between 27 and 33 months after a company's join date or previous recertification date. The mid-period audit should be a review of the effectiveness of the safety management system conducted by an RCP auditor who is certified by an AWO-recognized ~~auditor training and certification~~ third- party organization. Auditors should look at the previous external audit findings, internal audit reports, completion of corrective actions and related records. The mid-period ~~is~~ audit is a verification of compliance and implementation. The expectation of compliance or non-compliance, however, is the same as for the recertification audit: compliance is required in order to maintain RCP certification. The RCP auditor must immediately send notification of completion of the audit to the AWO-recognized ~~third party~~ third- party organization that trained and certified the auditor. The ~~third party~~ third- party organization must forward the certification of compliance to the AWO ~~Safety Department~~ Safety & Environmental Stewardship Department within ~~two~~ two (2) business days of receipt.

~~Notification of completion of the audit should be immediately sent to the AWO-recognized auditor training and certification organization that trained and certified the auditor. The organization will then forward the certification of compliance to the AWO Safety Department within two business days.~~

4. ~~An external management audit n RCP third-party recertification audit~~ cannot be used to fulfill the requirement for an annual internal audit required under RCP II.G.1.
5. ~~An auditor-certified RCP auditor~~ hired, consulted, or otherwise engaged by an AWO member company to develop its ~~sSafety mManagement sSystem (RCP)esponsible Carrier Program~~ shall not perform ~~that member's e~~ initial certification ~~audit of that member's Responsible Carrier Program. Subsequent rec.~~ Subsequent rRecertification audits may be performed by ~~the certified RCP~~ auditors without regard to any previous ~~role in~~ development of the company's sSafety mManagement sSystemrole.
6. If a company does not operate any towing vessels, ~~(but only barges)~~, it must complete comply with all applicable sections ~~of the management section of the RCP-Responsible Carrier Program.~~
7. If a company's equipment is bareboat-chartered to another company, there is no requirement for the owning company to comply with any of the provisions of the ~~RCPResponsible Carrier Program~~ for the bareboat chartered equipment.
8. If a company does not own or operate any equipment, but recognizes the RCP Responsible Carrier Program in its vetting program, that company itself is not a Responsible Carrier. The ~~Responsible Carrier Pprogram RCP~~ is a set of policies and procedures for companies that own and/or operate towing vessels and barges~~marine equipment~~, except as otherwise noted.
9. AWO ~~A~~affiliate members that provide tankermen and/or vessel crewmembers to ~~RCP~~RCP-certified AWO carrier members are eligible for certification as Responsible Carriers, ~~provided that~~if those tankermen and/or crewmembers, and the company, meet comply with all the training requirements and other applicable sections of the ~~Responsible Carrier Program~~RCP.
10. The ~~RCP shoreside-external~~ management audit and vessel audits are not tied together and may be conducted separately.
11. One hundred percent (100%) of a company's towing vessel fleet must be audited by an auditor certified by an AWO-recognized ~~auditor training and certification~~third party~~third party~~ organization every five years.
12. Auditors must ascertain that ~~all of~~all of an AWO member company's policies and procedures are supported by records that contain sufficient information to determine ~~the means by which~~how the company meets the requirements of the ~~RCP.CP~~. Auditors should also look for evidence that reflects a company's ongoing commitment to



complying with the letter and the spirit of the RCP. ~~The required documentary evidence that auditors will be looking for may include, but is not necessarily limited to~~ At a minimum, auditors should consult; maintenance records, crew safety meeting records, vessel inspection checklists, and personnel training records.

13. When deficiencies or nonconformities are found during an RCP audit, the steps needed to correct the deficiency may extend beyond the ~~RCP~~ audit due date. To address this issue, a company undergoing an audit must follow the following guidelines:
  - a) A corrective action plan must be submitted to, and approved by, the auditor within ~~two~~ (2) weeks of discovery of the nonconformity, but no later than the audit due date (even if that is less than ~~two~~ (2) weeks).
  - b) The corrective action plan must be fully implemented within 90 days of discovery of the nonconformity and documented and confirmed ~~with~~ by the auditor in follow-up.
  - c) This protocol is not applicable to mMajor nNonconformities, which must be addressed immediately.
14. If a mMajor nNonconformity is discovered during an RCP audit, the audit must stop and the issue must be fixed or downgraded before proceeding any further. A mMajor nNonconformity is defined as an identifiable deviation which poses a serious threat to personnel or vessel safety or a serious risk to the environment and requires immediate corrective action.
15. ~~The The Responsible Carrier Program~~RCP requires that all crewmembers be trained. Training programs do not have to be Coast Guard-approved unless otherwise required by regulation, but must be formal and well-documented.
16. Masters, mates (pilots), engineers; and tankermen ~~are required to~~ must receive training in marine firefighting and fire prevention. Deck crews ~~are required to~~ must be trained in vessel firefighting and fire prevention. ~~Using these broad guidelines, it is up to the company to determine the content of the training.~~ The company may develop training content to reflect unique operational needs. ~~It should be noted that~~ the difference between marine firefighting and vessel firefighting is chiefly one of focus. Vessel firefighting should concentrate to a large degree on hands-on firefighting techniques and; skills ~~that will be~~ necessary for the individuals who have ~~will have~~ the primary responsibility for the actual fighting of the fire. Marine firefighting is broader, includes greater detail, and focuses on the overall firefighting response. These are skills that are essential for individuals in supervisory positions who ~~will~~ direct the firefighting effort. Subjects should include theory, firefighting tactics, and overarching issues such as vessel stability, personnel safety, and emergency communications. This difference recognizes the role that each crewmember must fulfill in the event of an actual emergency. Fire prevention training is required for all positions. ~~This training can be as simple as~~ Fire prevention training should include proper storage of flammable materials, eliminating sources of ignition, and good housekeeping, especially in the galley and engine room.

17. When a company has completed an ~~an RCP-Responsible Carrier Program- external~~ management audit (that is, when an ~~an certified~~ auditor ~~certified by an AWO-recognized third party organization~~ has determined that the company is in full compliance with the ~~Responsible Carrier PRCP~~ program, including documentation of compliance with the vessel audit requirements), the auditor ~~should~~ must immediately ~~send a letter to notify~~ the AWO-recognized ~~third party~~ ~~third- party auditor training and certification~~ organization that ~~trained and~~ certified the auditor, certifying that the company is in full compliance with the ~~Responsible Carrier Program~~ RCP as of the time and date the audit was completed. Auditors ~~should~~ must use the following template for their certification letter:

THIS IS TO CERTIFY that on (date), the undersigned AWO-certified Responsible Carrier Program Auditor, at the request of (AWO member), without prejudice and for interested parties, did carry out the AWO Responsible Carrier Program ~~external~~ management audit of (company name) using the current version of the ~~Responsible Carrier Program~~ CP and (~~list name of third -party organization~~)'s ~~proprietary auditing materials~~ RCP Audit Checklist dated \_\_\_\_\_ and \_\_\_\_\_ respectively.

I am pleased to certify that (company name) was found to be in compliance with all applicable elements of the AWO Responsible Carrier Program as of the times and dates of the audit.

~~The third party~~ ~~third -party organization~~ must forward the certification of compliance to the AWO Safety Department ~~Safety & Environmental Stewardship Department within two (2) business days of receipt~~ ~~The AWO-recognized auditor training and certifying organization will then forward the letter to the AWO Safety Department within two business days~~ receipt. If the audit reveals nonconformities that must be corrected before the auditor can attest that the company is in full compliance with the ~~RCP~~ RCP, the company should work with the auditor to ~~correct those~~ address nonconformities through a corrective action plan. -

18. For vessel audits, when an ~~an certified~~ auditor ~~certified by an AWO-recognized third party organization~~ has determined that the vessel is in full compliance with the vessel portion of the ~~RCP~~ Responsible Carrier Program, the auditor ~~must~~ should immediately ~~send a letter to notify~~ the AWO-recognized ~~auditor training and certification~~ ~~third party~~ ~~third -party~~ organization that trained and certified the auditor certifying that the vessel is in full compliance with the Responsible Carrier Program as of the time and date the audit was completed. Auditors ~~should~~ must use the following template for their certification letter:

THIS IS TO CERTIFY that on (date), the undersigned AWO-certified Responsible Carrier Program Auditor, at the request of (AWO member), without prejudice and for interested parties, did carry out the AWO Responsible Carrier Program vessel audit of (vessel name or names) for (company name) using the current version of the RCP and (~~list name of third-party organization~~)'s ~~proprietary auditing materials~~ RCP Audit Checklist dated \_\_\_\_\_.

I am pleased to certify that (vessel name or names) was/were found to be in compliance with all applicable elements of the AWO Responsible Carrier Program as of the times and dates of the audit.

Letters of compliance for vessels ~~do not need to~~ should not be forwarded to the AWO ~~Safety Department~~ Safety & Environmental Stewardship Department; however, the company must maintain copies for their records and to demonstrate compliance at the mid-period and recertification external audits.

- a) If a vessel is unable to successfully complete an audit within the ~~given required~~ time frame allowed, it must be taken out of service ~~until such time as~~ until it can be brought into compliance, ~~in order for~~ in order for the company to remain in compliance with the ~~RCP Responsible Carrier Program~~. If a vessel fails to pass its vessel audit, the auditor must immediately ~~send a letter to~~ notify the AWO-recognized ~~auditor training and certification~~ third party third -party organization that trained and certified the auditor noting that the vessel or vessels is/are not in compliance with the ~~Responsible Carrier Program RCP~~ as of the time and date the audit was completed. The AWO-recognized ~~auditor training and certifying~~ third party third - party organization ~~must immediately~~ will notify the AWO ~~Safety Department~~ Safety & Environmental Stewardship Department ~~upon receipt~~ t immediately.
19. Upon receipt of a properly executed audit certification letter from an ~~certified RCP~~ auditor certified by an AWO-recognized third party organization attesting to the AWO member's full compliance with the ~~RCP Responsible Carrier Program~~, including documentation of compliance with vessel audit requirements, transmitted by the AWO-recognized ~~auditor training and certification~~ third party third -party organization that ~~trained and~~ certified the auditor, AWO ~~should~~ will issue a Certificate of Compliance valid for the appropriate ~~time period~~ time. AWO ~~should~~ will not receive a copy of the completed audit tool or other details on the status of a member's compliance.
20. AWO's certification of a member's ~~RCP Responsible Carrier Program~~ is contingent on the ~~at~~ company remaining a member in good standing of ~~AWO~~ the association.
21. ~~The member company "owns" the completed audit, and B T~~ both the company, auditor and/or AWO-recognized third -party organization ~~and the auditor~~ should retain copies of the audit documents and reports. Copies of the audit are provided to third parties only by the audited company or by the auditor at the audited company's ~~request~~ request. The auditor should be available to discuss the audit results with a company's customer(s) at the audited company's request.
22. A company ~~may is permitted to~~ use an ~~certified RCP~~ auditor certified by an AWO-recognized third party organization to conduct a ~~RCP n-RCP~~ audit in conjunction with another audit (e.g., ISM), effectively undergoing both audits at the same time and minimizing attendant financial costs and staff time.

## Addendum D. RCP Auditor Issues

1. Individuals seeking to become Responsible Carrier CP-Program (RCP) auditors are trained and certified by AWO-recognized ~~auditor training and certification third party~~third-party organizations. An AWO-recognized ~~auditor training and certification third party~~third-party organization must ensure that any individual it certifies as an RCP ~~n-AWO RCP~~ auditor meets, at a minimum, the ~~qualification, training and ethics~~ requirements outlined in 46 CFR §-139.130 ~~paragraphs 4 and 5 below~~. An AWO-recognized ~~auditor training and certification third party~~third-party organization may elect to establish higher, but not lower, standards, than those outlined ~~below~~in regulation.
2. An employee of an AWO member company ~~employee~~ who meets the ~~specified qualifications~~requirements of 46 CFR 139.130 may apply for certification by an AWO-recognized ~~third-party organization~~auditor training and certification organization to conduct RCP CP audits of other AWO member companies, ~~such as company vendors or outside towers, as a cost-effective way to provide smaller companies with access to the benefits of a third-party audit~~. To ensure the credibility of the RCP program, “reciprocal” audits are not permitted; that is, an ~~qualified~~ employee of Company A may not conduct an audit of Company B if an employee of Company B ~~has~~ audited Company A. In addition, an company employee is not permitted to audit his or her own company or a parent or subsidiary thereof.
3. Certified RCP-A auditors certified by an AWO-recognized third party organization are prohibited from making any reference to AWO or, the RCP CP, or to the auditor’s status as a certified RCP auditor in connection with about work performed for non-AWO members, including in certification letters, opinion letters, and/or public statements.

### ~~3. Qualifications:~~

~~Auditors must show satisfactory evidence of ALL the following:~~

- ~~1. High school graduation or GED;~~
- ~~2. Barge and towing industry, or other qualifying experience;~~
- ~~3. Successful completion of a recognized, in person, lead auditor training course and auditing experience of at least two years.~~

~~AND:~~

~~Experience that includes at least two from a.), b.), and c.):~~

- ~~a.) Vessel inspection or surveying experience (e.g. employment as a Coast Guard inspector, classification society surveyor, etc.);~~
- ~~b.) Sailing experience in a licensed capacity;~~
- ~~c.) Direct responsibility for vessel maintenance, repair, operations, etc.~~

~~OR:~~

~~At least five (5) years of acceptable professional safety practice with the following:~~

- ~~• Primary function with responsibility for the prevention of harm to people, property and the environment.~~
- ~~• Hazard recognition, evaluation and analysis, and development and implementation of controls.~~

- ~~— Recommendations — A letter of recommendation is required from two (2) AWO member companies in a position to evaluate applicant's suitability to conduct Responsible Carrier Program audits. If an applicant is an employee of an AWO member company, a letter of recommendation from said AWO member company is not acceptable.~~
- ~~— Certification — To achieve certification as an RCP Auditor, auditors will be required to attend all required classes and periodic recertification training presented by an AWO recognized auditor training and certification organization.~~

4. ~~As a condition of certification, all approved RCP auditors~~ certified by an AWO-recognized third party organization ~~must sign and adhere to a code of ethics agreeing to that promises they will:~~
- a) ~~Issue a letter of RCP CP-compliance certification only to AWO member companies that, in the best professional judgment of the auditor, meet the requirements of the RCP Responsible Carrier Program;~~
  - b) ~~Always act in a strictly trustworthy and unbiased manner in relation to the company being audited and to AWO;~~
  - c) ~~Not disclose the findings, or any part of an audit, to any third-party third-party without the express permission of the company audited, unless otherwise directed by regulation (e.g., submitting audit reports and reporting criminal violations major nonconformities to the proper authorities Coast Guard, amongst other regulatory requirements);~~
  - d) ~~Always act in a manner that promotes the highest professional standards and enhances the reputation of the RCP Responsible Carrier Program and AWO the American Waterways Operators.~~
5. ~~The An AWO member company operator must report a~~ Any violation of this code of ethics by an certified auditor will be reported to the AWO-recognized auditor training and certification third party third-party organization that certified the auditor, and may result in disciplinary action against the auditor up to and including the loss of certification. The disciplinary process in regards to ethical violations by an RCP auditor shall be handled by T the AWO-recognized auditor training and certification third party third-party organization by which the auditor was certified has reasonable discretion to determine the disciplinary process in regard to regarding ethical violations by an RCP auditor, up to and including the loss of certification. .

6.—The AWO-recognized ~~auditor training and certification third party~~third -party organization that certified an RCP-auditor against whom disciplinary action is taken shall notify the RCP Standards Board in writing (hard copy or email) of the action taken. ~~7.~~

~~8.~~6.If an AWO member company is found to have colluded with an RCP-auditor certified by an AWO-recognized third party organization who is disciplined for unethical behavior, the AWO-recognized ~~auditor training and certification third party~~third -party organization that disciplined the auditor must shall notify the RCP Standards Board in writing (hard copy or email). ~~T~~and the member company ~~may~~will be subject to action under the AWO *Constitution and Bylaws*.

## Addendum E. RCP Standards Board (~~formerly the RCP Accreditation Board~~)

1. The Responsible Carrier Program (RCP) Standards Board must include one AWO member each representing ~~each of the industry sectors—the~~ Coastal, Inland Liquid, and Inland Dry sectors, and one member each representing the inland and coastal Harbor Services sector, (Inland and Coastal)— and two shipper members, preferably one liquid and one dry cargo shipper. Standards Board membership is limited to AWO carrier members only. A representative of the AWO Safety & Environmental Stewardship Department ~~must will~~ serve ~~as an~~ *ex officio*, as a nonvoting member of the ~~board~~Standards Board.
  2. RCP Standards Board m~~Members~~ are appointed by the AWO Board of Directors to ~~will~~ serve ~~three~~two-year terms. ~~and Standards Board members~~ may be reappointed for multiple terms. Standards Board members are divided as equally as practicable into three classes, with one class per year subject to annual appointment/reappointment and ~~Board of Director~~ approval by the Board of Directors. -
  3. The role of the RCP Standards Board is to make recommendations to the AWO Board of Directors on ~~interpretations and~~ changes to the RCP-Responsible Carrier Program, the audit process, oversight of AWO-recognized third-party organizations, and applications from organizations seeking to become AWO-recognized ~~auditor training and certification~~third-party organizations.
  4. The RCP Standards Board has the authority to issue Clarifications and Directives Memoranda, as needed, to guide RCP~~esponsible Carrier Program~~ interpretation by AWO-recognized~~approved~~ third-party organizations. The AWO Safety & Environmental Stewardship Department is responsible for maintaining and archiving Standards Board Clarifications and Directives Memoranda, and issuing copies to affected parties.
  5. The RCP Standards Board shall ~~adhere to a defined staggered cycle ensuring~~ that it conducts an in-depth reassessment of the AWO member-related services, proprietary auditing materials and other relevant items of each AWO-recognized~~approved~~ third-party organization on a defined, staggered cycle, in order ~~is provided an in-depth assessment of its AWO member-related services and review of annual reports, proprietary auditing materials, amongst other items, necessary to preserve a consistently high standard of quality and adherence to the RCP.~~
- 3.—
- 4.6. To avoid potential conflicts of interest, no more than three (3) certified auditors engaged in private contractual ~~Responsible Carrier Program~~ audits for hire may serve on the RCP Standards Board. Furthermore, any member of an AWO-recognized third-party ~~auditing~~ organization's executive committee is prohibited from serving on the Standards Board.

**Addendum F. ~~Third Party~~AWO-Recognized Third P-party Auditor Training and Certification - Organizations**

~~1.~~—An organization seeking AWO recognition to train and certify AWO Responsible Carrier Program (RCP) ~~CP~~-auditors, and ~~perform RCP~~perform RCP audits, must meet the following requirements:

~~a) Use the requirements and protocols outlined in the AWO RCP Addenda as the minimum requirements for auditor qualifications. The organization may improve upon current AWO requirements and protocols, including utilizing ANSI 17024 (Accreditation Program for Personnel Certification Bodies) and ANSI 19011 guidelines for management systems auditing, but may not lower the minimum requirements contained in the RCP Addenda.~~

~~2.1.~~

a) Have been approved by the Coast Guard to operate as a Third p-Party Organization under 46 CFR Part 139.

b) Provide a description of the organization, including ownership, management and structure.

c) Provide a general description of the clients being served or intended to be served.

d) Provide a description of the types of work performed by the principals of the organization in the past, noting the amount and extent of such work performed within the previous three years.

e) Provide objective evidence of an internal quality system based on ANSI/American Society of Quality Control Q9001-2000 or an equivalent quality standard.

f) Provide curricula, organizational procedures, and supporting documentation to describe the processes used to train and certify auditors and records to show system effectiveness. Provide copies of checklists, forms, or other tools to be used in the training and certification of auditors.

g) Have procedures for appeals and grievances.

h) Have a code of ethics.

i) Disclose any potential conflicts of interest. Provide a statement that the organization, its managers and employees ~~will not~~are not be involved in any activities ~~that~~which could result in a conflict of interest or otherwise limit their independent judgment.

j) Demonstrate financial viability.



k) Have a business continuity plan in place.

k)–

3.2. Application and approval process for AWO-recognized ~~third party~~ third-party auditor training and certification organizations:

- a) An organization that meets the requirements above ~~is~~ will not automatically ~~be granted the authority~~ recognized by AWO to train and certify RCP ~~CP~~ auditors. The AWO Board of Directors, based on the recommendations of the RCP RCP Standards Board, ~~will~~ retains the authority to determine whether ~~entering into an~~ entering into an agreement with an organization to train and certify RCP auditors, ~~and perform RCP RCP audits~~, serves the needs and interests of AWO, AWO members, and the RCP AWO RCP.
- b) An organization wishing to ~~enter into an~~ enter into an agreement with AWO to train and certify RCP auditors ~~or perform RCP audits~~ must will submit an application apply to the RCP RCP Standards Board by submitting a letter of interest along with ~~that includes~~ evidence of compliance with the requirements above.
- c) The RCP RCP Standards Board ~~should~~ will make a recommendation to the AWO Board of Directors on whether to ~~enter into an~~ enter into an agreement with an organization that meets the above requirements to train and certify RCP ~~CP~~ auditors, ~~and perform RCP RCP audits~~.

4.3. AWO oversight of AWO-recognized ~~auditor training and certification~~ third party third party organizations:

- a) AWO and the AWO-recognized ~~auditor training and certification~~ third party third party organization(s) ~~must will enter into a~~ enter into a contract regarding that will spell out all mutual obligations, rights, and responsibilities.
- b) An AWO-recognized ~~auditor training and certification~~ third party third party organization ~~will report annually~~ must submit an annual report to the RCP RCP Standards Board on or before June 30 on its activities. The annual report must include a summary of activities, including number of audits performed, auditors trained, and any requests for clarifications from AWO.
- c) Substantive changes, additions or deletions to the document third party organization's audit tools that change their ~~its~~ interpretation or effect, to TPO audit tools must be approved by the RCP Standards Board.
- b) ~~Substantive changes to TPO audit tools must be approved by the RCP Standards Board.~~

## Addendum G. Terminology Reference Guide

Anniversary Date	The day and month of each year that corresponds to the date of expiration on the Certificate of Inspection (COI) or Towing Safety Management System (TSMS) Certificate. <i>46 CFR §136.110.</i>
Audit	A systematic, independent, and documented examination to determine whether activities and related results comply with a vessel's TSMS, or with another applicable Safety Management System (SMS), and whether these planned arrangements are implemented suitably to achieve stated objectives. This examination includes a thorough review of appropriate reports, documents, records, and other objective evidence to verify compliance with applicable requirements. <i>46 CFR §136.110.</i>
Corrective Action	Action taken to eliminate or mitigate the cause of a system deficiency, hazard, or risk. <i>ANSI/ASSE Z10-2012 (R2017).</i>
Deficiency	A failure to meet the minimum requirements of the vessel inspection laws or regulations. <i>46 CFR §136.110.</i>
Essential System	A system that is required to ensure a vessel's survivability, maintain safe operation, control the vessel, or to ensure safety of onboard personnel. <i>46 CFR §136.110.</i>
External Audit	An audit conducted by a party with no direct affiliation to the vessel, owner, or managing operator being audited. <i>46 CFR §136.110.</i>
Incident	An event in which a work-related injury or illness (regardless of severity) or fatality occurred or could have occurred (commonly referred to as a "close call" or "near miss"). <i>ANSI/ASSE Z10-2012 (R2017).</i>
Internal Audit	An audit that is conducted by a party that has a direct affiliation to the vessel, owner, or managing operator being audited. <i>46 CFR §136.110.</i>

Major Non-conformity	A nonconformity that poses a serious threat to personnel, vessel safety, or the environment, and requires immediate corrective action. <i>46 CFR §136.110.</i>
Marine Firefighting	Any firefighting related act undertaken to assist a vessel with a potential or actual fire, to prevent loss of life, damage or destruction of the vessel, or damage to the marine environment. <i>33 CFR §155.4025</i>
Near Miss	An event, or sequence of events, that did not result in an injury or incident but which, under slightly different circumstances, could have done so. <i>ANSI/ASSE Z10-2012 (R2017).</i>
Non-conformity	A situation where objective evidence indicates that a specified SMS requirement is not fulfilled. <i>46 CFR §136.110.</i>
Objective Evidence	Quantitative or qualitative information, records, or statements of fact pertaining to safety or to the existence and implementation of an SMS element, which is based on observation, measurement, or testing that can be verified. This may include, but is not limited to, towing gear equipment certificates and maintenance documents, training records, repair records, Coast Guard documents and certificates, surveys, classification society reports, or TPO records. <i>46 CFR §136.110.</i>
Observation	A statement of fact made during a safety management audit and substantiated by objective evidence. <i>International Safety Management Code (2014)</i>
Policy	A specific statement of principles or a guiding philosophy that demonstrates a clear commitment by management, or a statement of values or intentions that provide a basis for consistent decision making. <i>46 CFR §136.110.</i>
Preventive Action	Action taken to reduce the likelihood an underlying system deficiency or hazard will occur or recur in another similar process. <i>ANSI/ASSE Z10-2012 (R2017).</i>
Procedure	A specification of a series of actions or operations that must be executed in the same manner in order to uniformly comply with applicable policies. <i>46 CFR §136.110.</i>

Risk	An estimate of the combination of the likelihood of an occurrence of a hazardous event or exposure(s), and the severity of injury or illness that may be caused by the event or exposures. <i>ANSI/ASSE Z10-2012 (R2017)</i> .
Safety Management System or SMS	A structured and documented system that enables personnel involved in vessel operations or management, as identified in the SMS, to effectively implement the safety and environmental protection requirements of the standard, and is routinely exercised and audited. <i>46 CFR §136.110</i> .
Skiff	A small auxiliary boat carried on board a towing vessel. <i>46 CFR §136.110</i> .
Survey	An examination of the vessel, including its systems and equipment, to verify compliance with applicable regulations, statutes, conventions, and treaties. <i>46 CFR §136.110</i> .
Towing Vessel	A commercial vessel engaged in or intending to engage in the service of pulling, pushing, or hauling alongside, or any combination of pulling, pushing, or hauling alongside. <i>46 CFR §136.110</i> .
Towing Safety Management System or TSMS	An SMS for a towing vessel as described in part 138 of 46 CFR Subchapter M (Towing Vessel Inspection). <i>46 CFR §136.110</i> .
Unsafe Condition	A major nonconformity observed on board a vessel, or an incident that would cause the owner or managing operator to request a permit to proceed from the Coast Guard. <i>46 CFR §136.110</i> .