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MEMORANDUM

TO: Responsible Carrier Program® Third-Party Auditing Organizations
American Bureau of Shipping
Nippon Kaiji Kyokai (ClassNK) America
Towing Vessel Inspection Bureau

FROM: Brian S. Bailey

RE: Vessel Audit Requirement for RCP Certification and Recertification

Please be advised that this correspondence is sent on behalf of the Responsible Carrier Program® Standards Board of The American Waterways Operators to advise its third-party auditing organizations of a clarification derived from a recent inquiry made by a TPO. The role of the Standards Board is to make recommendations to the AWO Board of Directors on maintaining and strengthening the integrity of the RCP. This includes interpretations and changes to the RCP, the RCP audit process, oversight of AWO-recognized auditor training and certification organizations, and applications from organizations seeking to become AWO-recognized auditor training and certification organizations.

Clarification

“When calculating 10% of vessel audits required for RCP certification and recertification, are ‘laid-up’ vessels factored into the member company’s overall fleet to determine the number of vessels requiring an audit?”

Despite the RCP not addressing whether a “laid up” vessel should be included in the calculation of the number of audits required of an AWO member, the AWO *Constitution & Bylaws* (January 2014) Section 4 states:

“B. “All equipment owned, operated, managed, and chartered in as of the recording date, whether idle or not, must be reported, except for equipment engaged in non-transportation enterprises.

1. Non-transportation equipment shall be defined as follows:

- Vessels retired from revenue service, i.e., vessels removed from service during the previous 12 months and not intended to be returned to service in the following reporting period.

AWO recognizes the distinction between a vessel that is “laid up” for business reasons and one that is “laid up” for an extended period with an operator having no intention of placing the vessel back into service. Should a vessel be “laid up” for business reasons, it cannot be exempted from being included in the vessel audit percentage requirement. Only if a vessel is fully decommissioned and/or being scrapped can it be excluded the audit requirement.

Thank you for your attention to this matter. Please do not hesitate to contact me if you have any questions or concerns.