
3. OVERSIGHT

Owners choosing the Coast Guard inspection option will work with the USCG directly in obtaining and maintaining COIs for their vessels. As mentioned, owners must schedule their annual vessel inspections with the local OCMI three months in advance of the desired inspection date. Projecting vessel location this far out could prove to be very difficult. This said, if an owner operates a fleet of vessels that operate in a small geographic area then they may be able to provide such advanced notice without issue. Inspection scheduling will be subject to the availability of the local USCG inspections team.

Each owner choosing the TSMS option must create and employ a USCG-approved TSMS ashore and on board each operated vessel, as well as schedule audits and surveys at the intervals previously described. Leading industry operators have been utilizing safety management systems for years to improve safety for their people, property and the environment. These systems also promote efficient operation and improved performance. Positive performance and safety metrics may be considered by insurers and potential customers. Partnering with a TPO that employs highly experienced, well-trained surveyors and auditors will provide owners access to an additional pool of knowledge without having to hire full-time employees for their own companies. Partnering with a TPO should also provide for greater scheduling flexibility, which will allow operators to carry out their business largely uninterrupted.

To meet vessel survey requirements, owners may hire a TPO to conduct the annual surveys on board their vessels or may utilize their own qualified, in-house surveyors to conduct annual, drydocking and internal structural examination survey work. If selecting the “internal” survey option, owners must ensure that their surveyors have the qualifications and experience outlined in 46 CFR 139.130 (c). This internal survey work may be carried out at one time or divided over an extended period of time so long as no more than 365 days lapse between survey of any item required to be surveyed. Although a company’s own qualified personnel carry out internal survey work, the TPO approves and maintains oversight of the internal survey program and reserves the right to attend associated survey work at any time.

4. CHOOSING A COMPLIANCE OPTION

At this point, we should be able to determine which option is most attractive to our individual operation and make the necessary arrangements for preparing our vessels for inspected status. Owners choosing the Coast Guard inspection option should reach out to their local OCMI as soon as possible to begin planning for the inspection of their fleet. If availability permits, your local inspection team may be able to come out and benchmark your progress toward full compliance and provide corrective action information. Continued dialogue between vessel operators and the USCG is encouraged whether an operator chooses the Coast Guard inspection or TSMS option.

If the TSMS option is the correct fit for your operation, who are the TPOs approved to carry out the audit and survey work? The USCG lists approved TPOs on their website. Classification societies, such as the American Bureau of Shipping (ABS) are listed separately and are also approved to carry out both the survey and audit functions of a TPO. At the time of this writing, there are 15 organizations approved to carry out TPO work. With such a large number of choices it is important for operators to exercise due diligence and meet with candidate TPOs before making a final selection.

There are several important factors to consider when evaluating and selecting a TPO for compliance partnership. The first is to understand the qualifications and training of the TPO’s personnel. 46 CFR 139.130 outlines the minimum requirements for surveyors and auditors