

# Development of Commercial Fishing Vessel Alternate Safety Compliance Programs (ASCPs)

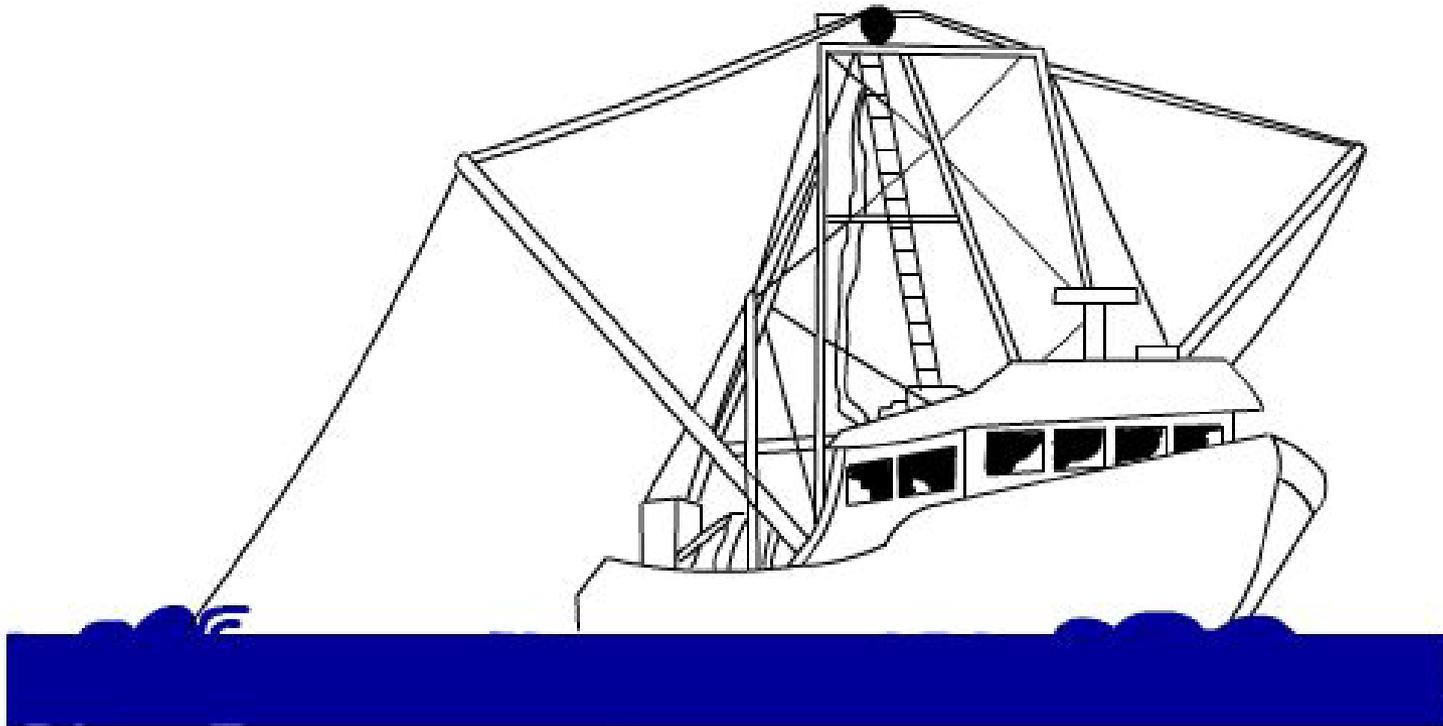
by Troy Rentz

USCG 13<sup>th</sup> District Fishing Vessel Safety

ACSA Coordinator

[troy.rentz@uscg.mil](mailto:troy.rentz@uscg.mil)

(206)220-7216



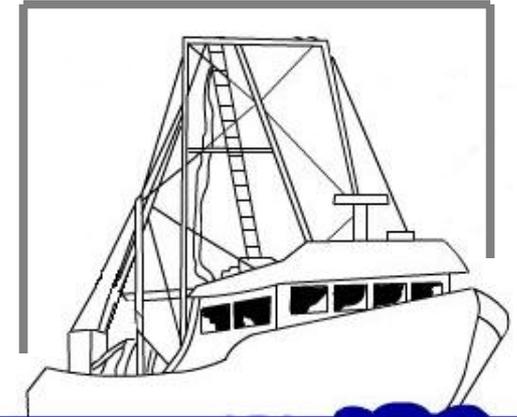
The Coast Guard Authorization Act of 2010 requires the Coast Guard to develop, in cooperation with the commercial fishing industry, Alternate Safety Compliance Programs (ASCPs).



# Does my vessel need to enroll in an Alternate Safety Compliance Program?

- 1) A commercial fishing vessel, tender or processor 25 years of age or older in 2020  
OR  
vessel completes a major conversion after the program is prescribed.

- 2) at least 50 feet overall in length



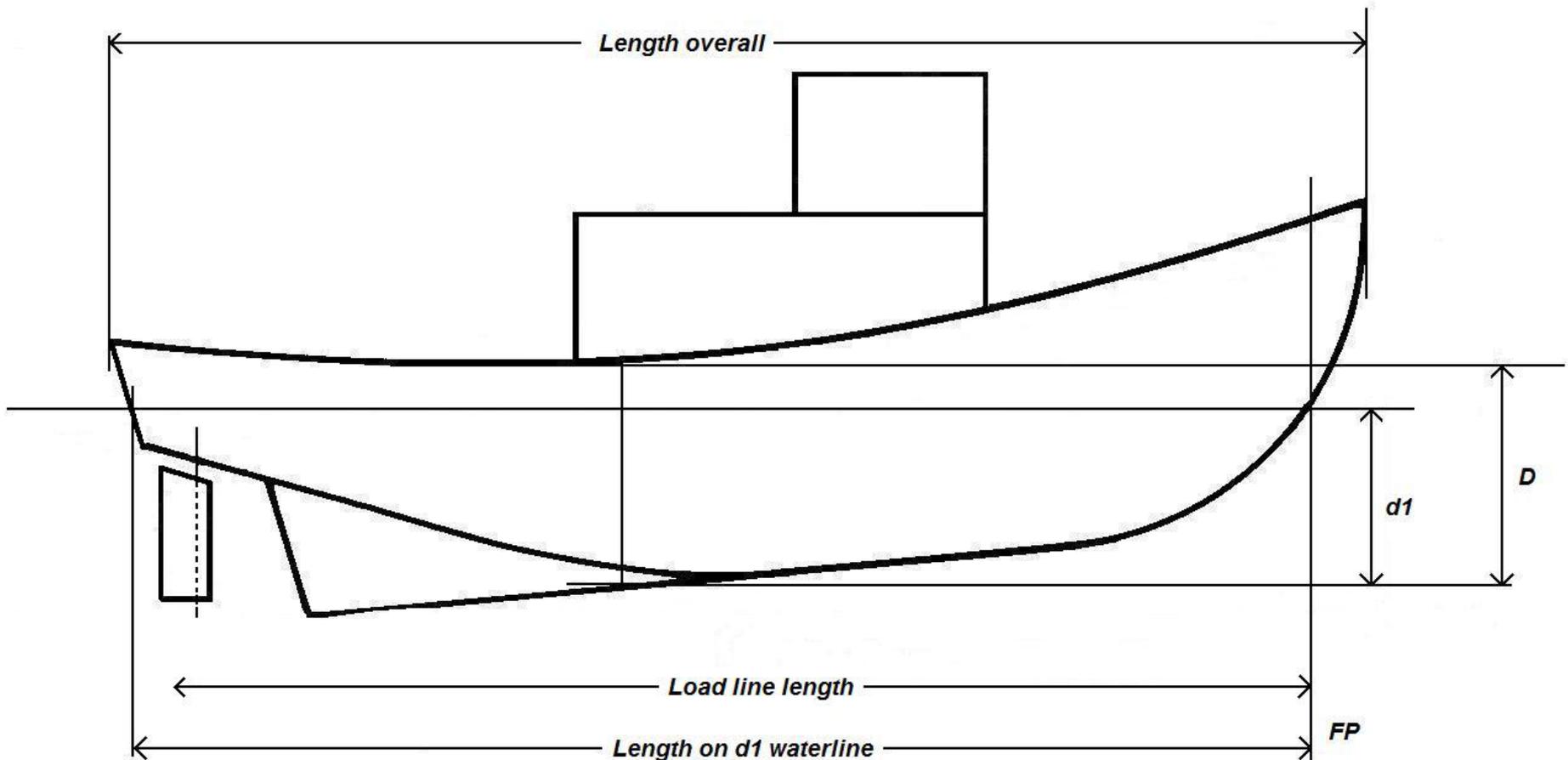
- 3) Operates beyond 3 NM from shore

Vessels meeting all 3 criteria will need to enroll

Vessels operating with more than 16 POB inside 3NM will also need to enroll

# Overall Length (LOA)

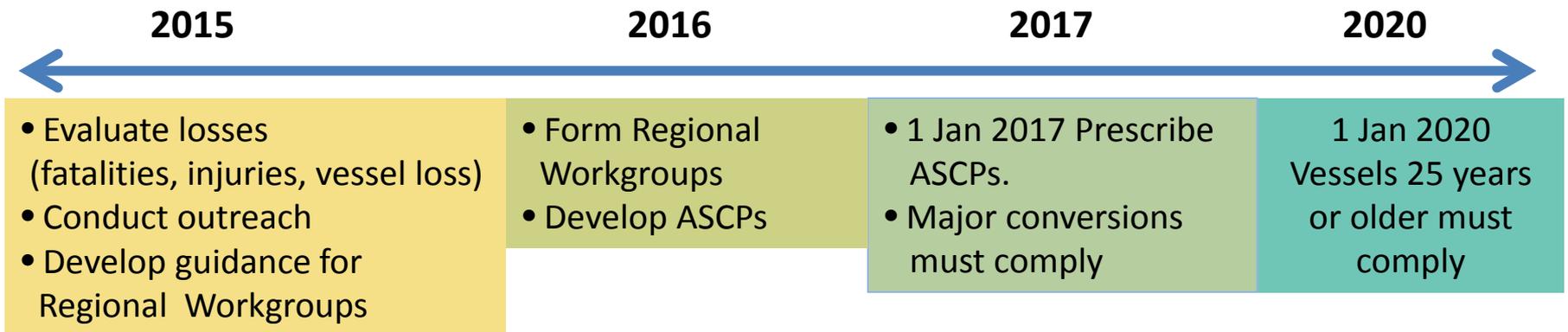
New requirements for Classification and ASCP use “overall in length” (LOA). A vessel’s overall length is generally a few feet longer than the registered length.





# Time-line

ASCPs must be prescribed by the Coast Guard by January 1, 2017 and implemented by 2020 (2030 for companies with more than 30 vessels subject to ASC).



ASCPs may be risk based programs developed for specific regions and fisheries.



Studies have shown that operational risks widely vary between individual fleets and regions.

# Recommended objectives of ASCPs:

- Reduce vessel losses, fatalities and serious injuries.
- Address specific risks within a fleet and not simply adopt standards from other programs.
- Determine whether existing best practices if adopted fleet-wide are sufficient to meet ASC objectives.
- Leverage new technologies as a means to reduce risk
- Consider geographic and marine infrastructure limitations
- Identify and dedicate resources to implementing and maintaining the program.
- Consider economic impacts to vessel owners.

# How regional and fishery specific program requirements may be determined:

1. Form regional workgroups based upon fisheries, geographic location and common risks.
2. Utilize NIOSH & Coast Guard data to assess regional and fisheries risk factors.
3. Evaluate marine casualties (vessel and personnel) based on gear type/fishery/geographic region
4. Evaluate risks (both evidence-based risks measured in studies and also risks perceived by industry that have not been measured)
5. Prioritize job hazards
6. Develop program requirements that address those hazards using the ASCP Matrix as a tool

# Suggested ASC standards for all vessels:

- Review casualties and prioritize risks
- Maintain the watertight/weathertight integrity of the vessel
- Have a plan for the use of PFDs and the prevention of falls overboard (falls overboard, not wearing a PFD is the most common fatal event in commercial fishing)
- Vessels with EPIRBs should upgrade to GPS EPIRBs when servicing is due  
(Example of leveraging new technology to reduce risk)

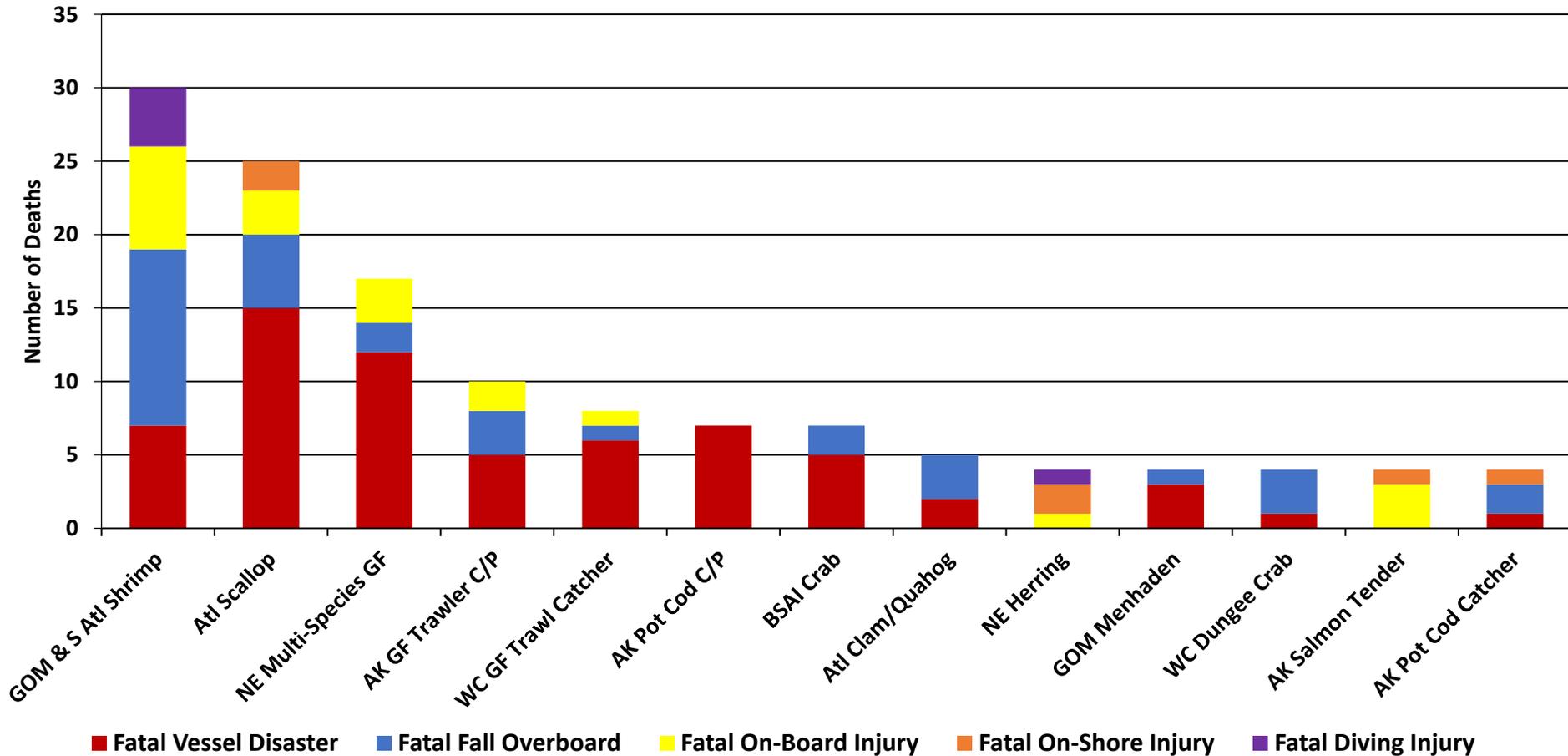
# Matrix page – Example forming a Risk Based ASCP

REQUIREMENT	ALL?	RISK FACTORS & OTHER APPLICABILITY	EXAM INTERVAL
<b>CREW and DECK SAFETY</b>			
1. Deck safety concerns specific to fishery and gear type: If hazard analysis reveals deck safety risks not addressed below, specific prevention measures will be developed in the regional work groups.	ALL	Review hazards specific to the fishery or gear type & evaluate/develop safety methods to mitigate the risk.	Verify during dockside exams
2. New Crew Orientation & Training: _ All crew members need to be taken through crew orientation & emergency instructions prior to initial departure	ALL	Good marine practice	Verify during dockside exams
3. Freon & refrigerant detectors: _ Installed in spaces containing main receiver and compressors _ Portable Freon & Refrigerant detectors shall also be on board _ Must be calibrated within the manufacture's specifications _ Is refrigeration system isolated from engine room and other spaces? _ Is refrigeration exhaust system ventilation adequate?	R	Vessels using refrigerants (other than domestic use) in quantities that would be dangerous if released (e.g. used for cooling cargo/fish hold). Exception when main receiver, compressor, evaporator & safety relief valve are installed in well ventilated area on deck.	Install during ASC implementation. Test during dockside exams
4. Winch/drum protection: a. Eliminate the need for the winch b. Eliminate the need to manually guide cables onto drums c. Require controls for winches, drums, and other powered systems to automatically return to STOP if released d. Require sufficient guides & machinery guards e. Install emergency-stop devices	R	Applies to Trawlers and Seiners that have an elevated risk of injuries due to winches  Instructions that at-risk fleets improve upon their winch/drum protections.	Install during Dry-dock Verify during dockside Exams
5. Crane and boom safety: _ Inspection checklist _ Inspections current _ Fall Preventers for booms	R	Risk assessment identifies crane, rigging or boom hazards in fleet.	Verify during dockside exams

# How would the Matrix be used?

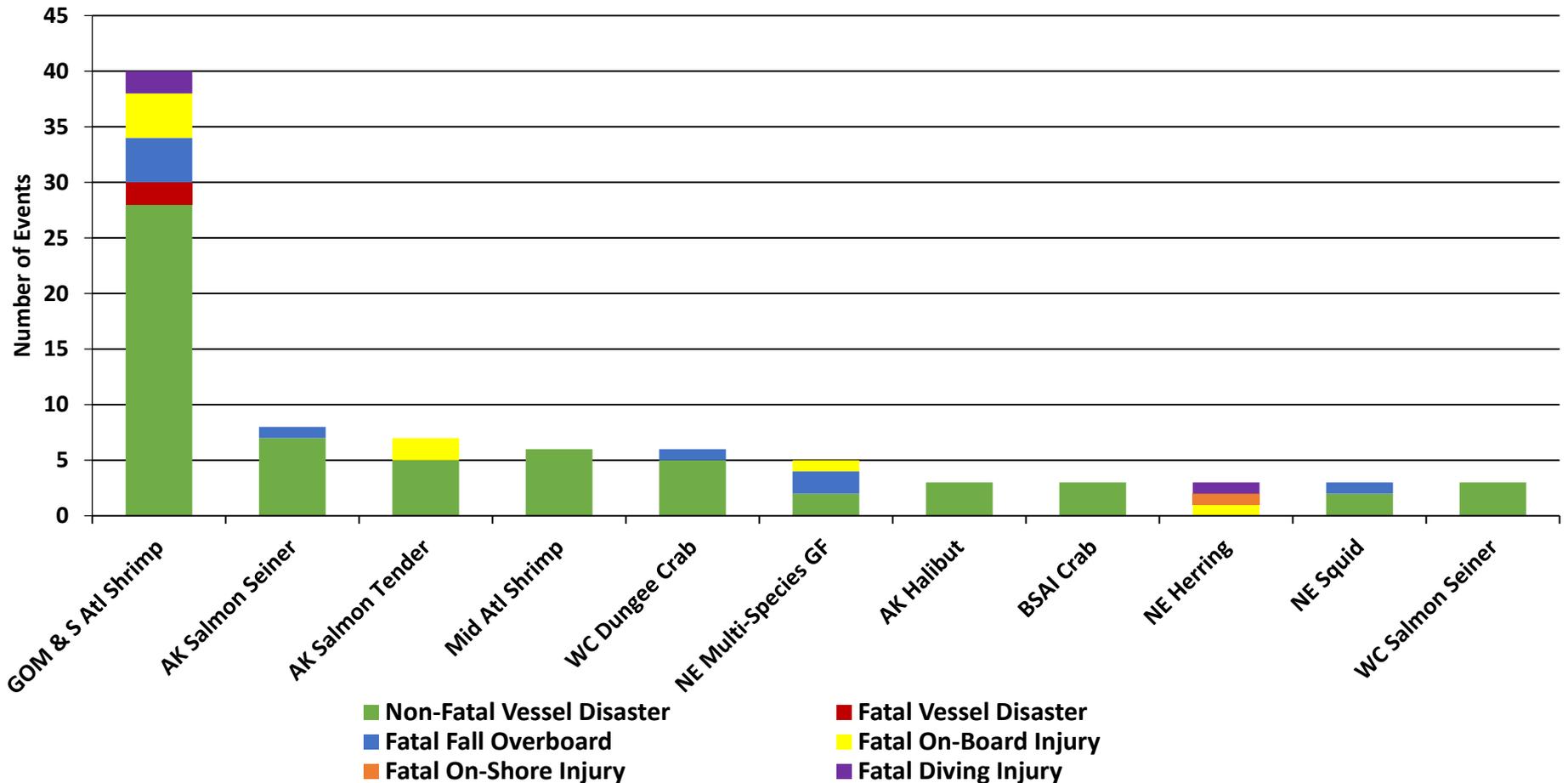
- Each district could have a base ASCP with best practices relevant to that region. Then have additional requirements for specific fleets that have special hazards and/or higher risk. Risk analyses will provide a manageable number of fleets to engage.
- In addition to each district's base ASCP, there could be fleet specific requirements in the plan or additional ASCPs for fleets that have the highest number of casualty incidents (selecting appropriate "RISK" items from the matrix).

# Work-Related Fatalities on *Vessels at Least 50'* in *Fleets with >3 deaths* during 2004-2013, by Incident Type (n=129)



This chart shows the number of deaths to workers on vessels at least 50' during the decade 2004-2013. Fleets with less than 4 fatalities during the decade are not included in the chart.

# Fatal and Non-Fatal Events on *Vessels at Least 50'* in *Fleets with >2 Incidents* during 2010-2013 (n=87\*)



\*For ALL fleets during 2010-2013, there were 131 total incidents on vessels at least 50'. 47 incidents were fatal resulting in 55 total fatalities

This chart shows the number of major casualty incidents that occurred during the 4-year period 2010-2013 on vessels at least 50'. Fleets with less than 3 incidents are not included in the chart. The majority of incidents were non-fatal vessel disasters, which are essentially vessel losses where the entire crew survives. It is important to understand that this chart is showing the number of incidents, not fatalities. Each incident in this chart can have more than one fatality or survivor involved.

Using findings depicted on the NIOSH charts, below is an example of how fleet plans could be grouped:

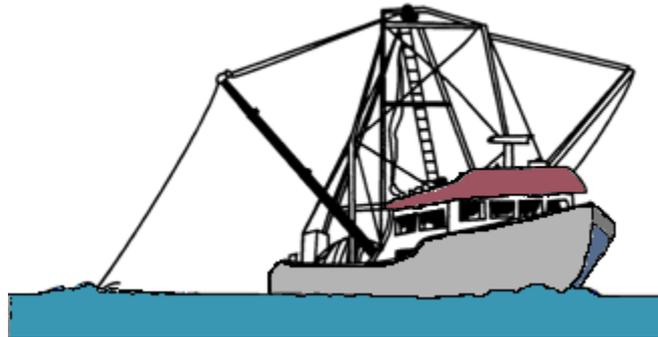
ASCP	USCG District							
	D1	D5	D7	D8	D11	D13	D17	D14
District/Region Plan	X	X	X	X	X	X	X	X
Northeast Multi-Species Groundfish	X							
Atlantic Scallop	X	X						
Gulf & Atlantic Shrimp		X	X	X				
West Coast Dungeness Crab					X	X		
AK Salmon Seine						X	X	
AK Tender						X	X	
BSAI Crab						X	X	

 = Shared plans, each district will have representation during development

# What should vessel owners be doing now?

1. Discuss Alternate Safety Compliance at association meetings.
  - \_Are vessel owners aware of the ASCP requirement?
  - \_Have the risks been assessed in your fishery?
  - \_What are the best practices to reduce identified risks?
2. Call the Coast Guard Fishing Vessel Examiner if you are planning on completing a Major Conversion of a vessel 50 ft. or greater in LOA.
3. Right now we are looking at vessels on a voluntary basis to help shape recommended requirements.

# Questions?



**Contact info: Troy Rentz**

USCG Thirteenth District (dpi) Seattle, WA

Fishing Vessel Safety, ACSA Coordinator

(206) 220-7216

[troy.rentz@uscg.mil](mailto:troy.rentz@uscg.mil)

[FishSafeWest.info](http://FishSafeWest.info)