

Alternative Compliance and Safety Agreement
for H & G Trawl & Longline Vessels

Background:

American Bureau of Shipping rules for classification and load line regulations are respectively a fundamental vessel construction code and a technique to confine vessel loading within structurally safe boundaries and recognized stability limits. For the Alternative Compliance and Safety Agreement (ACSA) program, the vessels under consideration have a proven record of satisfactory service for basic hull, machinery and service systems. If anything, casualty records indicate errors and omissions in maintenance and/or management of installed weather tight closing devices and vessel loading practices are most consistently related to vessel losses. These are principally load line and vessel stability issues.

The importance of periodic examinations by an outside authority, which is an intimate part of both classification and load line regulations, however, can not be overlooked. These premises as well as significant issues identified in recent casualties have been considered in the development these proposed requirements. These proposed requirements are stringent safety standards that would greatly improve watertight integrity, vessel stability, fire prevention, machinery maintenance, lifesaving equipment usage, and crew member training in the H & G fleet. The following is a summary of the proposed requirements, as well as a very brief comparative analysis which compares the proposed requirements to existing regulatory or classification standards.

Applicability:

The ACSA Program shall apply to vessels in the H & G fleet as follows:

- Existing or New Fishing Vessels: Existing or new fishing vessels that only produce those fish products identified as “H & G” in Enclosure (2) **do not** need to enroll in the ACSA program.
- Existing Fish Processing Vessels: Existing fish processing vessels that produce one or more of the nine fish products identified as “Beyond Minimal Processing” in Enclosure (2) shall comply with the ACSA inspection standards as follows:
 - Neither Loadlined nor Classed: Vessels that are not classed or loadlined must meet sections (A-L) of Enclosure (3).
 - Loadlined, but Not Classed: Vessels that are not classed, but have a current loadline, must meet sections (G-L) of Enclosure (3). These vessels must remain in compliance with loadline regulations to continue producing fish products identified in paragraph 3.b.
 - Grandfathered Fish Processing Vessels: Existing fish processing vessels that meet the grandfathering provisions for both classification or loadline as provided in reference (b) are not subject to processing limitations and **do not** need to enroll in the ACSA program. Guidance for verification of grandfathering status will be incorporated into this instruction as Enclosure (6) at a later date.

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- Loadlined and Classed: Vessels which are both classed and load lined are not subject to processing limitations and **do not** need to enroll in the ACSA program.
- New Fish Processing Vessels: A fish processing vessel built or converted for use as a fish processing vessel after January 1, 2006, which produces one or more of the products identified as being "Beyond Minimal Processing" or "Extensive Processing" in Enclosure (2) **cannot** enroll in the ACSA program. These vessels must be classed and loadlined as required by existing laws and regulations.

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A. Compliance

1. General: It is the Coast Guard's aim to provide a high level of supervision and oversight to the ACSA program until such time that program is fully established and is functioning at a high level. As such, the Coast Guard will assume the lead for compliance with the ACSA provisions. All Sections (A-L) of the ACSA agreement may be examined at any time by Coast Guard Marine Inspector or Coast Guard fishing vessel safety personnel.
2. Role of Approved Third Party Organizations: To the extent deemed appropriate by the local OCMI, accepted organizations such as ABS and DNV or an accredited marine surveyor of an approved 3rd party organization, may provide verification of appropriate sections of this agreement.
Enclosure (5) describes who may verify compliance and inspection intervals.
3. Issuance of Certificates of Compliance: For vessels enrolled in the ACSA program, a Certificate of Compliance, which verify compliance with 46 CFR Part 28 and 33 CFR Parts 151 and 155, will be completed on annually by ABS, DNV or an Coast Guard approved 3rd Party examiner. The Coast Guard will provide oversight to the COC examination, but will not issue a COC. As part of this dockside examination, emergency drills as required by 46 CFR 28, Part 270 will be performed to the satisfaction of the attending marine inspector or approved 3rd Party examiner, so long as that person is a Coast Guard approved drill conductor.
4. Overall Compliance: The Thirteenth or Seventeenth Coast Guard District Commander shall provide full compliance and oversight with Sections (A)-(L) of this agreement. Full compliance with the ACSA will be achieved when a letter of exemption is issued annually by the appropriate District Commander allowing an existing H & G vessel to operate as fish processing vessel.
5. Correction of Deficiencies and Enforcement: Following entry into the ACSA program, any participating vessel found to be out of compliance with the provisions of the program will be directed to correct any deficiencies in a timely manner as determined by the Officer in Charge of Marine Inspection. Failure to correct these deficiencies may result in removal from ACSA program. The goal of the ACSA program is to provide a reasonable amount of time (January 8, 2008) for vessels to come into compliance with the ACSA standards. However, nothing in this agreement shall limit the OCMI from requiring a vessel owner to correct an especially hazardous condition immediately if such a condition is found during the course of a compliance examination.

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B. Vessel Stability

Analysis: All existing fishing vessel stability requirements for a load line are met and are exceeded by the requirement for 5 year renewals. The essence of a load line is established by the installation of draft and limiting draft marks (based upon the Stability Report) and the tabulation of all subdivision and watertight integrity data in a Stability Report Addendum. This provides on board documentation of baseline features requiring a Naval Architect's attention for alteration or additions.

1. Each vessel will have on board current Stability Instructions complying with 46 CFR 28.530 based upon the following:

- a) Upon entering the ACSA program, the vessel will have an inclining experiment less than five (5) years old.
- b) At each five (5) year anniversary of the inclining experiment, a new inclining experiment and up-to-date Stability Instructions will be required, unless the validity of existing data and Stability Instructions can be verified by deadweight survey and inspections in compliance with 46 CFR 28.501(c) and (d).
- c) Stability Instructions will identify the location of a maximum draft mark to be located at the vessels mid-length.

2. An addendum to the above Stability Instruction shall be prepared no later than June 1, 2007. An addendum to the Stability Instructions will include:

- a) A list of all watertight bulkheads in the hull structure including size and type of watertight closures in each.
- b) A tabulation of all weather-tight closures: doors, hatches, scuttles, chutes, tank vents, and ventilation devices main deck or above. Each will be identified by type, size and location annotated to identify any automatic closure devices and operating stations. Coaming and vent heights will be provided. Alternately this information may be presented on deck plans and elevations as applicable.
- c) Tabulation of hull valves including location, size, type and remote operators, if any, for:
 1. Hull freeboard
 2. Underwater body
- d) Factory Sump Pump Calculations: Factory deck sump pump calculations defining required capacity on each side of the vessel equal to twice the total inflow to the factory. If no sump pumps are used (e.g. freeing ports and / or scuppers only), this shall be identified in stability addendum, and information shall be provided as to the number and

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size of the freeing ports or drain lines. Vessels with unique arrangements that provide an equivalent level of safety and meet the intent of this requirement may apply for a waiver.

- e) Any changes, alterations or additions made to any of the items listed in the stability addendum must be approved through the naval architect who issued the stability instructions in paragraph (1) of this section and must be brought to the attention of the local Officer in Charge Marine Inspection (OCMI).

3. Record Keeping: Copies of Stability Instructions and Inclining/Deadweight Survey will be submitted to local OCMI.

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C. Drydock and Internal Structural Examination (ISE)

Analysis: These standards are the same as Coast Guard inspected vessel regulations (intervals and scope of inspection). These standards exceed loadline requirements, as it requires two drydockings every five years, vice one drydocking every five years.

1. Each vessel will be drydocked and an ISE conducted a minimum of 2 times in any 5 year period with a maximum interval of 3 years in accordance with 46 CFR 61.20-5.
2. Owners will notify the local Officer in Charge Marine Inspection 30 days in advance of all scheduled drydockings, and as soon as possible for unplanned drydockings.
3. When any vessel is drydocked and an ISE conducted under this agreement, the Coast Guard, accepted organizations, or an accredited marine surveyor of an approved 3rd party organization shall examine the hull, internal structure, propeller, stern bushing, sea connections and fastenings.
4. Sea chests, sea valves, sea strainers, and valves for the emergency bilge suction shall be opened up for examination every alternate drydocking under this agreement.
5. Hull Markings
 - a) Fore and aft draft marks shall be provided.
 - b) Maximum draft mark location in terms of mid-length location by frame number and distance in inches from the moulded main deck line to the bottom of the mark. The mark will be 12 inches long, one inch wide, horizontal white line centered on the listed location. The line will be permanently outlined port and starboard by weld bead or punch marks.
6. Where guidance is needed for repairs to hull, framing, and other structural members, existing requirements for inspected vessels and principals of good marine practice should be utilized. A Drydock Examination Guidebook will be developed for vessel owners, Coast Guard, accepted organizations, or an accredited marine surveyor of an approved 3rd party organization to utilize.

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D. Tail Shaft Examinations

Analysis: These standards are the same as inspected vessel standards.

Tail Shaft Examination & Intervals

1. Each examination, inspection and test prescribed by these sections must be conducted in accordance with 46 CFR 61.20-15 in the presence of Coast Guard, accepted organizations, or an accredited marine surveyor of an approved 3rd party organization.
2. A lubricant that demonstrates the corrosion inhibiting properties of oil when tested in accordance with ASTM D 665 (incorporated by reference, see Sec. 61.03-1) is considered to be equivalent to oil for the purposes of the tailshaft examination interval.
3. Except as provided in paragraphs (4-5), of this section, each tailshaft must be examined twice within any 5 year period. No more than 3 years may elapse between any 2 tailshaft exams.
4. Tailshafts on vessels fitted with multiple shafts must be examined once every 5 years.
5. Tailshafts with inaccessible portions fabricated of materials resistant to corrosion by sea water, or fitted with a continuous liner or a sealing gland which prevents sea water from contacting the shaft, must be examined once every 5 years if they are constructed or fitted with a taper, keyway, and propeller designed in accordance with the American Bureau of Shipping standards to reduce stress concentrations or are fitted with a flanged propeller. Accessible portions of tailshafts must be examined visually during each drydock examination.
6. Tailshafts with oil lubricated bearings, including bearings lubricated with a substance considered to be equivalent to oil under paragraph (2) of this section ***need not be drawn*** for examination--
 - a) If tailshaft bearing clearance readings are taken whenever the vessel undergoes a drydock examination or underwater survey;
 - b) If the inboard seal assemblies are examined whenever the vessel undergoes a drydock examination or underwater survey;
 - c) If an analysis of the tailshaft bearing lubricant is performed semiannually in accordance with the lubrication system manufacturer's recommendations to determine bearing material content or the presence of other contaminants; and
 - d) If for tailshafts with a taper, the propeller is removed and the taper and the keyway (if fitted) are nondestructively tested at intervals not to exceed 5 years; or
 - e) For tailshafts with a propeller fitted to the shaft by means of a coupling flange, the propeller coupling bolts and flange radius are nondestructively tested whenever they are removed or made accessible in connection with overhaul or repairs.

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Additional Tail Shaft Examination Requirements

1. On tailshafts with a taper, keyway, (if fitted) and propeller designed in accordance with American Bureau of Shipping standards to reduce stress concentrations, the forward 1/3 of the shaft's taper section must be nondestructively tested in addition to a visual inspection of the entire shaft.
2. On tailshafts with a propeller fitted to the shaft by means of a coupling flange, the flange, the fillet at the propeller end, and each coupling bolt must be nondestructively tested in addition to a visual inspection of the entire shaft.

Tail Shaft Clearance, Bearing Wear

1. Water lubricated bearings, other than rubber, must be rebushed as follows:
 - a) Where the propelling machinery is located amidship, the after stern tube bearing must be rebushed when it is worn down to 6.4 mm (0.25 in) clearance for shafts of 229 mm (9 in) or less in diameter, 7.95 mm (0.3125 in) clearance for shafts exceeding 229 mm (9 in) but not exceeding 305 mm (12 in) in diameter, and 9.53 mm (0.375 in) clearance for shafts exceeding 305 mm (12 in) in diameter.
 - b) Where the propelling machinery is located aft, the after stern tube bearing must be rebushed when wear is 1.6 mm (.0625 in) less than the applicable clearance for propelling machinery located amidship.
2. Water lubricated rubber bearings must be rebushed when any water groove is half the original depth.
3. Oil lubricated bearings must be rebushed when deemed necessary by the Officer in Charge, Marine Inspection. The manufacturer's recommendation shall be considered in making this determination.

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E. Hull Audio Gauging

Analysis: These standards exceed loadline requirements, as it provides the option to requires hull gauging twice in five years, vice once in five years. Otherwise, they are very similar to load line requirements.

1. Hull and main support member thickness gauging should be conducted for initial consideration of exemption and at each alternate scheduled dry dock thereafter, at the discretion of the cognizant OCMI in consultation with accepted organizations, or an accredited marine surveyor of an approved 3rd party organization. Gauging shall include, but not be limited to:

- a) Three transverse sections in the midship 0.5L.
- b) Internal of the fore and after peak tanks.
- c) Wind and water strakes, port and starboard, full length.
- d) All exposed main deck plating and superstructure deck plating.
- e) All bottom plating.
- f) Plating of sea chest.
- g) Other suspect areas throughout the hull.

2. Wastage shall not exceed 25% of original plate thickness, unless it can be shown by calculation that the wasted plate continues to exceed ABS minimum standards.

3. If original scantlings are not known, the OCMI, in consultation with the accepted organization or an accredited marine surveyor of an approved 3rd party organization, shall make a reasonable estimate of the original scantlings. Wastage shall not exceed 25% of the estimated plate thickness before permanent repairs are made.

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F. Watertight and Weather-tight Closures

1. All watertight doors through which the vessel crew may pass that are listed in the Stability Instruction Addendum shall be fitted with a sign on both sides reading “Opening authorized for transit only – keep closed at sea”. Similar signs shall be posted at all weather-tight doors to buoyant volume spaces (as identified by Naval Architect).
2. Administrative controls shall be prepared to manage the status of watertight and weather-tight closures listed in the Stability Instruction Addendum. As a minimum these controls shall include:
 - (a) Detailed preventative maintenance schedule for watertight and weather-tight closures.
 - (b) Written instructions for at-sea security watches for periodic surveillance of the status of all watertight and weather-tight closures listed in the Stability Instruction Addendum. Specific notation of required closure status shall be made for at least the following vessel dispositions: in transit, active fishing/processing, idle on fishing grounds.
 - (c) A written log signed daily by the master and a ships log entry shall record security checks required by paragraph F. 2. b.
3. The following special requirements apply to weather-tight personnel access doors, main deck to vessel interior, in the aft .33L of the vessel:
 - (a) Door coamings shall be 24 inches minimum.
 - (b) Doors shall be “quick acting” type.
 - (c) A “door ajar” alarm (audio/visual house conning station.) will be installed to sound at the pilot conning station. Up to a 60 second delay may be installed to avoid interference with vessel operations.
4. If a particular hazard regarding the status of watertight or weather-tight closures is identified during a vessel survey, an appropriate engineered solution shall be developed by the owner, naval architect, to the satisfaction of the OCMI.
5. Factory Space High Water Alarm: A factory space high water alarms will be installed near each corner of the factory space to sense water accumulation. The sensors will be positioned to alarm at levels greater than 6 inches deep. Time delays (up to 5 sec.) may be incorporated to prevent false alarm due to surge or splash conditions. A visual alarm shall be installed in the factory and at the machinery space control flat. Both visual and audio indicators shall be installed in the pilot house. The visual and audio alarm in the pilot house will include a distinctive indicator at the normal piloting station instrument panel.

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G. Machinery Maintenance, Inspection, and Testing

Analysis: These standards require a preventative maintenance program (including record maintenance) for a vessel's propulsion, generator, and auxiliary equipment. It also includes the implementation of certain fire hazard countermeasures. These maintenance and material requirements, enhanced by annual review and fire safety surveys, substantially upgrade the reliability and safe operation of the machinery plants and auxiliary systems.

1. Machinery Maintenance: The material, design, construction, workmanship and arrangement of main propulsion and electrical generation machinery and of each auxiliary, directly connected to the engines and supplied as such, shall be maintained to the regularly scheduled preventative maintenance standards as established by the manufacture or the manufacture's authorized representative. A Machinery Inspection and Testing Guidebook will be developed for vessel owners, Coast Guard marine inspectors, accepted organizations, and accredited marine surveyors of an approved 3rd party organization to utilize.

2. Fuel Systems

a. All hoses carrying oil (fuel oil, lube oil, or hydraulic oil systems) located in the engine room shall be fire resistant and shall comply with J-1942 standards. This would exclude the use of push lock fittings and hoses on these systems.

b. Where fuel level gauges are used on a metal tank, the flanges to which gauge fittings are attached must be welded or brazed to the tank. Tubular gauge glasses, if fitted to diesel fuel tanks, must be of heat resistant materials, adequately protected from mechanical damage, and provided at the tank connections with devices that will automatically close in the event of rupture of the gauge or gauge lines.

3. Guards and Exposed Hazards - Each exhaust pipe within 15 feet of fuel, lube, or hydraulic oil sources, must be insulated or otherwise guarded to prevent ignition.

4. Examination of Records and Tests - At each annual inspection for continuation in this program, the Coast Guard, accepted organizations, or an accredited marine surveyor of an approved 3rd party organization may review preventative maintenance records, may conduct such tests and inspections of the main propulsion and electrical generation machinery, and of each auxiliary and of its associated equipment, as they feel necessary to ensure safe operation.

a. In general, this examination should not be more thorough than that required for a mid-term examination of an inspected vessel vice an inspection for certification

5. Fire Safety Hazard Survey - At each annual inspection, the Coast Guard, accepted organizations, or an accredited marine surveyor of an approved 3rd party organization and the vessel representative shall conduct a fire safety hazard survey of the engine spaces to identify and remedy any additional fire safety hazards which may exist, but are not specifically identified in the ACSA program.

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H. Life Saving Equipment & Arrangements

Analysis: Focuses primarily upon a vessel's ability to quickly and safely evacuate vessels with large crew complements. This is not a classification issue, but meets or exceeds current inspected vessel standards.

1. All required liferafts will be mounted in a manner to be launched manually by a single person.
2. Coast Guard or SOLAS approved embarkation ladders will be installed for each required liferaft embarkation station that is five or more feet above the water line in normal operating conditions.
3. Each immersion suit will be fitted with a Coast Guard or SOLAS approved strobe type PMEL lights.
4. Subject to individual liferaft manufacturer approval, paddles for all Coast Guard approved liferafts shall not be made of plastic.

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I. Fixed Fire Fighting Equipment & Arrangements

Analysis: These standards require a Coast Guard inspected and NPFA approved fixed fire fighting system for spaces with internal combustible engines and additional fire detection capability in the engine spaces and accommodation spaces. This standard meets existing inspected and classed vessel requirements.

1. Each vessel must be fitted with a fixed gas fire extinguishing system in the following enclosed spaces:

- a) A space containing an internal combustion engine of more than 50 horsepower (main space);
- b) A space containing an oil-fired boiler;
- c) An incinerator or;
- d) A space containing a gasoline storage tank or other flammable materials (such as a paint locker.).

2. System types and alternatives.

- a) All fixed gas fire extinguishing systems for main machinery spaces shall be installed in accordance with 46 CFR Part 76 and other appropriate NPFA standards.
- b) A pre-engineered fixed gas fire extinguishing system may be installed only in a normally unoccupied machinery space (excluding main engine spaces), paint locker, or space containing flammable liquid stores that has a gross volume of not more than 33.98 cubic meters (1200 cubic feet).

3. Pre-engineered fixed gas fire extinguishing systems must:

- a) Be approved by the Commandant for the intended application (e.g. incinerator space, bow thruster room, etc)
- b) Be capable of manual actuation from outside the space in addition to any automatic actuation devices; and
- c) Automatically shut down all power ventilation systems serving the protected space and all engines that draw intake air from within the protected space.
- d) A vessel on which a pre-engineered fixed gas fire extinguishing system is installed must have the following equipment at the operating station:
 - (i) A visual alarm to indicate the discharge of the extinguishing agent;

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- (ii) An audible alarm to sound upon discharge of the extinguishing agent; and
- (iii) A means to reset devices used to automatically shut down ventilation systems and engines as required by paragraph (d)(1)(iii) of this section.

4. Smoke / Heat Detectors

- a) Heat detectors alarms (rate of rise / maximum temperature) shall be installed in each space fitted with a fixed gas fire extinguishing system. Coast Guard approved fire detection systems and equipment complying with 46 CFR 161.002, as well as, non-Coast Guard approved fire detection systems meeting the criteria listed in 46 CFR 27.203 are acceptable.
- b) Each accommodation space must be equipped with an independent modular smoke detector or a smoke actuated fire detecting unit installed in accordance with 46 CFR Part 76.33.
- c) These independent modular smoke detector must meet UL 217 and be listed as a "Single Station Smoke Detector--Also suitable for use in Recreational Vehicles."
- d) Other fire / smoke / heat detectors for accommodation spaces may be approved for use by the local OCMI.

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J. Other Fire Fighting Equipment & Fire Fighting Plans

Analysis: These standards seek to increase a vessels fire fighting (and de-watering) capabilities by requiring portable fire fighting capability, fireman's outfits, and fire fighting plans. These standards meet or exceed classification requirements.

1. Each vessel must be equipped with an independently powered (independent of the ship's auxiliary power system) portable fire/dewatering pump. The portable pump and hoses must be stowed outside the engine room.
2. Each pump will be provided with suction hose and strainers adequate to reach water sources for either service and must be capable of picking up suction for the highest lift. Correspondingly, discharge hose must be readily available for each service.
3. The pump shall be capable of producing two effective 40 foot streams, each from a standard 1.5 inches diameter lined commercial fitted with a corrosion resistant dual purpose nozzle capable of providing a solid stream and a spray pattern.
4. Each vessel with 26 or more people on board will be equipped with a minimum of (4) traditional bunker style fireman's outfits as described in 46 CFR 96.35.
 - a) Each outfit will consist of: one self-contained breathing apparatus, attached lifeline, flashlight, rigid helmet, boots, gloves, protective clothing with reflective tape and one fire axe.
 - b) At least two spare air bottles will be provided for each self-contained breathing apparatus.
 - c) Each SCBA must be approved by MSHA and NIOSH have a minimum 30 minute air supply and a full face mask.
5. Each vessel with less than 26 people on board will be equipped with a minimum of (2) traditional bunker style fireman's outfits as described in paragraph (4) above.
6. Crew members who are identified in the vessel's Watch, Quarter and Station Bill as fire team members who will wear the above protective equipment shall undergo Coast Guard approved fire-fighting training.
7. Fire and Safety Plan-Each vessel will maintain an up-to-date Fire and Safety Plan.

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K. Emergency Drills & Training

Analysis: Increases on board trained drill instructor, fosters effort to improve multi-language training and requires a record of emergency drills and training. This is not a classification issue, but meets or exceeds current inspected vessel standards.

1. Each vessel that operates with less than 16 people on board shall have a minimum of two (2) certified Fishing Vessel Drill Conductors on board.
2. Each vessel that operates with 16 – 25 people on board shall have a minimum of three (3) certified Fishing Vessel Drill Conductors on board.
3. Each vessel that operates with 26 - 35 people on board shall have a minimum of four (4) certified Fishing Vessel Drill Conductors on board.
4. Each vessel that operates with more than 35 people on board shall have a minimum of five (5) certified Fishing Vessel Drill Conductors on board.
5. Every reasonable effort shall be made, including the use of North Pacific Fishing Vessel Owners Association and Alaska Marine Safety Education Association Spanish & Vietnamese language safety videos, to ensure that all non-English speaking crew members and fish processing personnel are familiar with their emergency responsibilities and duties.
6. All emergency drills and training shall be logged by the master of the vessel. Emergency drills and training records shall be maintained on board the vessel and at the vessel's home office for three years.
7. Sailing Short: At the outset of a voyage a vessel should "possess" the complement of certificated drill conductors as stipulated in this section. In certain unusual circumstances, when vacancies occur at or after the time the crew is required to be aboard, the vessel may sail short, provided the vacancy was without the consent, fault, or collusion of the master, owner, or any other person interested in the vessel, and the master has made a conscientious effort to find a qualified replacement. In addition, the master must be satisfied that the vessel is safe to make the intended voyage. Desertion, arrest, failure to join, hospitalization, etc., are considered to be unusual circumstances and may be grounds for sailing short if the master considers the remaining complement sufficient. However, at each port or place called at during the voyage (including the port of departure), the master has an obligation to obtain qualified replacements if they are available. The master need not obtain permission to sail short, but must report the situation in writing within 12 hours of arrival at the port of destination. The master's decision to sail short is subject to the OCMI's review and appropriate administrative action should be taken if warranted.

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L. Emergency Communications and Navigation

Analysis: These standards institute particular requirements to preserve positive administrative controls relative to discharge of fixed fire fighting systems. It also implements use of GMDSS and AIS equipment. This is not a classification issue, but meets or exceeds current inspected vessel standards.

1. For vessels where it is the policy to notify the master of the vessel prior to discharging the vessel's fixed fire fighting system into the engine room, vessel owners shall install an independently powered emergency communication system between the wheelhouse and the controls to the fixed fire fighting system, to allow immediate emergency notification communication to the wheelhouse.
2. Each vessel must have clear procedures, signed by the master and chief engineer explaining the conditions under which fixed extinguishing systems are to be used and responsibilities of all involved parties. These procedures should be included in monthly drills.
3. Emergency handheld radios may be used to meet this requirement, so long as the radios are stowed upon the bridge and at the controls to the fixed fire fighting system.
4. Global Maritime Distress Signal System (GMDSS): All vessels enrolled in the alternative compliance agreement shall be in compliance with Coast Guard Navigation and Vessel Inspection Circular 3-99.
5. Automatic Information System (AIS): In accordance with 33 CFR 164.46, all vessels shall be equipped with a properly installed and operational AIS system.