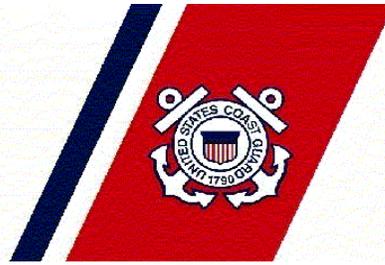


*U.S. Department of
Homeland Security*
**United States
Coast Guard**



Guidance for Implementation
of the
Alternate Compliance and Safety
Agreement Program

Rev. 14 Sep 2009

Introduction

The guidance in this document is provided to ensure consistency among various Coast Guard units involved in carrying out the Alternate Compliance and Safety Agreement (ACSA) Program. This document addresses the implementation of the voluntary ACSA Program and provides specific instructions regarding recommended safety requirements. The elements in this document, and the specific instructions regarding those elements, are not intended to supplement the exercise of good judgment in implementation of the Program.

Much of the information in this document reiterates information already provided via different venues and correspondence. The ACSA Program governing guidance remains [PCV Policy Letter 06-03](#), dated July 1, 2006. A copy of this document may be downloaded at www.fishsafe.info. This document is also provided for the benefit of ACSA vessel owners and operators, naval architects, marine surveyors, shipyards and other industry partners. Wide dissemination is encouraged.

This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is not intended to nor does it impose legally-binding requirements on any party. It represents the Coast Guard's current thinking on this topic and may assist industry, mariners, the general public, and the Coast Guard, as well as other federal and state regulators, in applying statutory and regulatory requirements. You can use an alternative approach for complying with these requirements if the approach satisfies the requirements of the applicable statutes and regulations. If you wish to discuss an alternative approach, you may contact Mr. Dan Hardin, as provided below.

This document and [G-PCV policy letter 06-03](#) may call for the "collection of information" as defined in the Paperwork Reduction Act of 1995, 44 U.S.C. 3501 et seq. To the extent such a collection has not been approved by the Director of the Office of Management and Budget (OMB) and does not display a valid control number assigned by the Director, no person shall be subject to any penalty for failing to comply with the collection of information. We anticipate initiating an information collection request for any such collection of information as part of an upcoming rulemaking project.

Points of Contact

Questions

Questions concerning the ACSA Program should be directed to the Thirteenth Coast Guard District Commercial Fishing Vessel Safety Coordinator, Mr. Dan Hardin (206) 220-7226 (daniel.e.hardin@uscg.mil) or Mr. Troy Rentz (206) 220-7216 (troy.rentz@uscg.mil) the ACSA Program Coordinator.

Examinations

Examinations may be requested from the Coast Guard Sector Command nearest the location at which the vessel will be examined.

Sector Seattle

Mr. Marty Teachout (206) 217-6187

Sector Anchorage

Mr. Ed Miner (907) 271-6945

Marine Safety Detachment Dutch Harbor

LT Karen Denny (907) 581-3466

Marine Safety Detachment Kodiak

LT Jason Boyle (907) 486-5918

Adequate notice for scheduling purposes and travel should be provided depending upon distance from the Coast Guard office and the vessel.

Unscheduled examinations such as emergency dry-docking should be relayed to the appropriate office at the first opportunity.

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History of Alternate Compliance and Safety Agreement

The Bering Sea/Aleutian Island (BSAI) and Gulf of Alaska (GOA) freezer longliner and freezer trawler fleet, referred to as the H&G Fleet, occupy a unique niche in the North Pacific fishing industry. Unlike other catcher vessels which deliver fish in the round to shore plants, H&G vessels catch, sort, head, eviscerate, clean, and prepare fish into various fish products on board the vessel. These products are then frozen, packaged, and stored on board until offloaded. Vessels in the H&G Fleet have historically been regulated as “fishing vessels” as opposed to “fish processing vessels.”

Formal Coast Guard investigations into the losses of the F/Vs ARCTIC ROSE and FPV GALAXY, and subsequent analysis of the H&G fishing fleet found that nearly 100% of the vessels in this fleet are not operating as fishing vessels but instead are operating as fish processing vessels.

In terms of vessel safety requirements, the [Commercial Fishing Industry Vessel Safety Act of 1988 \(P.L. 100-424\)](#) and the implementing regulations found in [46 CFR Part 28](#) make significant distinctions between fishing vessels and fish processing vessels. The requirements for fish processing vessels are much more stringent than those required for fishing vessels.

Specifically, non-grandfathered fish processing vessels are required by [46 CFR 28.710](#) and [46 CFR 28.720](#) to be classed by the American Bureau of Shipping, or a similarly qualified organization, and to be examined at least once in every two years for compliance with applicable regulations. Additionally, 46 CFR Subchapter E—Load Lines applies to fish processing vessels over 79 feet in length.

The Coast Guard believes that a strict interpretation of the fish processing vessel definition serves safety, and is consistent with both the law and Congressional intent. In making a final determination of what products are considered to be fish processing, the Coast Guard has utilized the standardized descriptions from the National Marine Fishery Service Product Codes (50 CFR, Part 679, Table 1). [See Annex 1 – Product Codes.](#)

Due to age restrictions imposed by the American Bureau of Shipping and Det Norske Veritas classification societies, nearly 70% of the H&G Fleet will not be accepted for classification. Thus these vessels cannot come into compliance with the existing regulatory framework for fish processing vessels. The regulations in [46 CFR 28.720](#) do not provide an alternative for the operator of a fish processing vessel that cannot be classed; however under [46 CFR 28.60](#), such a vessel may request an exemption letter.

Contrary to conventional wisdom, strict enforcement of the requirements for classification and Load Line would not improve safety because it is estimated that 40 H&G vessels with 1200 fishermen on board would simply change the amount of processing they do on board to operate as uninspected fishing vessels, subject to minimal safety requirements. The ACSA Program was developed in 2006 to process individual requests for exemption letters under [46 CFR 28.60](#). The Program allows exemptions to

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the class and Load Line requirements while at the same time providing an equivalent level of safety for these vessels by improving safety requirements for these vessels, thereby avoiding the incentive to operate strictly as uninspected fishing vessels. The Coast Guard has continually supported legislation that would improve the safety of the commercial fishing industry by subjecting all commercial fishing industry vessels to a mandatory inspection regime. Until such a regime is enacted, programs similar to the ACSA may be necessary to provide an equivalent level of safety for commercial fishing industry vessels. The hallmark of this Program is the approach of working closely with industry stakeholders in developing elements of this alternate and voluntary program in order to save lives. The Coast Guard will continue to exercise an aggressive leadership role in this Program while consulting with the H&G Fleet stakeholders to honor their significant commitment to date.

Because the H&G Fleet operates in both the Thirteenth and Seventeenth District areas of operations, the ACSA Program has been developed with the concurrence of both District Commanders. Success of the ACSA Program depends upon a high level of coordination between these Districts, Sector Seattle, and Sector Anchorage.

This Program has been praised by all involved. It is a success story for the Coast Guard and for the H&G Fleet. Implementation of the Program has improved safety immeasurably for the H&G Fleet. Nonetheless, initial implementation of the Program, the sinking of the F/P ALASKA RANGER March 23, 2008, and lessons learned from initial implementations have caused a reexamination of the Program. While there are successes resulting from ACSA Program implementation, there are also now a sufficient number of lessons to be learned from initial implementation and the Marine Board of Investigation of the sinking of the ALASKA RANGER. This necessitates evolution of the Program. As such Annex 4 of this document includes:

1. Additional elements requirements for enrollment/renewal of exemptions under [46 CFR 28.60](#) through the ACSA Program, which are considered necessary to improve the level of safety of vessels enrolled in the ACSA Program.
2. Provisions for granting exemption from the requirements of 46 CFR Subchapter E – Load Lines.
3. Consolidation and clarification of previously provided guidance.

Inasmuch as the ACSA Program was developed in consultation with the H&G Fleet stakeholders, additional information has been provided in this document to make it useful for all stakeholders.

The creation of the Program is documented in a number of separate documents

1. Commandant [G-PCV Policy Letter 06-03](#), dated July 1, 2006
2. [D13 Instruction 16710.1](#) dated Jun 15, 2006
3. [D13/D17 Whitepaper \(“Statement of Mutual Support and Cooperation”\)](#) dated [June 15, 2006](#) – Alternative Compliance and Safety Agreement (ACSA) for the Bering Sea/Aleutian Island and Gulf of Alaska Freezer Longliner and Freezer Trawler Fishing Fleets.

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These documents are to be maintained electronically and easily accessed by going to <http://www.fishsafe.info/>.

This guidance incorporates a CG-840 style book of checklist items with explanations of requirements, references for further detail, and other amplifying information.

Section A – Administration

Who is covered by ACSA?

Definitions

Fish Processing Vessel: The law ([46 U.S.C. 2101\(11b\)](#)) defines a fish processing vessel as “a vessel that commercially prepares fish or fish products other than by gutting, decapitating, gilling, skinning, shucking, icing, freezing, or brine chilling.” Coast Guard policy (MVI Policy Letter 14/90 dated June 20, 1990, file 16710) has consistently been to support an aggressive interpretation of what activities justify determining that a vessel is operating as a fish processing vessel. [Annex 1](#) lists the activities determined to constitute fish processing and vessels engaged in those activities are fish processing vessels.

Fishing Vessel: The law ([46 U.S.C. 2101\(11a\)](#)) defines a fishing vessel as “a vessel that commercially engages in the catching, taking, or harvesting of fish or an activity that can reasonably be expected to result in the catching, taking, or harvesting of fish.” [Annex 1](#) also lists the activities determined not to be fish processing. Based upon this, a vessel which produces only those fish products identified as “H&G” in [Annex 1](#) is considered to be a fishing vessel.

Applicability

The ACSA Program was developed for those approximately 64 fish processing vessels, historically known as the H&G Fleet. Applicability of certain provisions of law, regulations, and the ACSA Program are dependent upon several considerations as explained below. This Program is available to all H&G Fleet vessels, and although fishing vessels are not subject to the same legal requirements as fish processing vessels and do not need an exemption from those legal requirements, the Program is available and encouraged for fishing vessels for the safety benefits. To ensure the safety benefits of the Program, an operator of a vessel who desires to have the vessel enrolled should comply with the specific Program elements, as explained below.

Applicability Checklist

1. To be accepted into the Alternate Compliance and Safety Agreement (ACSA) Program
 - a. Select one of the following:
 - Vessel is **classed** and **loadlined**.

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- This vessel does not need an exemption and thus does not need to enroll in the ACSA Program, but does need to have a Certificate of Compliance as a fish processing vessel issued by a third party.
 - ❑ Vessel is grandfathered, vessel has operated without major conversion as a fish processing vessel since before July 27th 1990, vessel does not need to be classed or loadlined. Vessel does need a Certificate of Compliance as a fish processing vessel.
 - ❑ Vessel is **not classed** but **does have a loadline** the vessel should:
 - Provide a stability book in compliance with section B of this document.
 - Provide a valid copy of the loadline certificate.
 - Have a valid Certificate of Compliance as a fish processing vessel.
 - Complete sections G-L of this document.
 - ❑ Vessel **is not classed** and **not loadlined**, this vessel should:
 - Provide a stability book in compliance with section B of this document.
 - Have a valid Certificate of Compliance as a fish processing vessel.
 - Complete sections A-L of this document.
- b. Below are the milestones for enrollment into the ACSA Program
- July 15, 2006 – Submit enrollment application.
 - July 15, 2006 to September 15, 2006 - Schedule a preliminary examination with Sector Anchorage or Seattle.
 - May 1, 2007 - completed preliminary examination.
 - By June 1, 2007 - Sector Anchorage/Seattle issued a letter authorizing interim enrollment.
 - All examinations completed by January 1, 2008. (District Commanders may grant up to a 12-month extension on a case-by-case basis.)
 - Sectors will report to the district those that are in compliance for issuance of exemption letter authorizing continued operation as a fish processing vessel under the ACSA.

Discussion

Existing or New Fishing Vessels

Existing or new fishing vessels that only produce those fish products identified as “H&G” in [Annex 1 – Product Codes](#), do not need to enroll in the ACSA Program. Enrollment is encouraged because of the safety benefits.

Existing Fish Processing Vessels

Existing fish processing vessels that produce one or more of the nine fish products identified as “Beyond Minimal Processing” in [Annex 1 – Product Codes](#), have several options:

- A. Become classed and loadlined;

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- B. Enroll in the ACSA Program; or
- C. Revert to production of H&G products only.

Not Classed, No Load Line Certificate

A vessel that is not classed and has no Load Line Certificate and enrolls in the ACSA Program should meet Sections (A-L) of this document to continue operating as a fish processing vessel producing products listed in [Annex 1](#) as “Beyond Minimal Processing.”

Load Line Certificate, Not Classed

A vessel that is not classed, but has a valid Load Line Certificate, should meet Sections (G-L) of this document. These vessels should maintain Load Line Certificates in addition to receiving a letter of exemption of classification requirements from the District Commander under the ACSA Program to continue operation as a fish processing vessel producing products listed in [Annex 1](#) as “Beyond Minimal Processing.”

Grandfathered Fish Processing Vessels

A fish processing vessel that meets the ‘grandfathered’ provisions explained in [Annex 3](#) is not subject to the requirements for a Load Line Certificate or classification as required by 46 CFR Part 28 Subpart F. Such vessels need not enroll in the ACSA Program, although they are encouraged to do so. Vessels that meet the grandfathering provisions may continue to process fish without restriction.

Load Lined and Classed

Vessels which are both classed and load lined do not need to enroll in the ACSA Program. There are no limitations on processing for these vessels.

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 "[Extensive Processing](#)" in [Annex 1](#) is not eligible for enrollment in the ACSA Program. These vessels must be classed and load lined as required by existing laws and regulations.

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 "[Beyond Minimal Processing](#)" in [Annex 1](#) must either be classed and load lined as required by existing laws and regulations, or on a case-by-case basis, may be enrolled in the ACSA Program but may not produce those products as identified as “Beyond Minimal Processing” until such time as the vessel is in full compliance with the ACSA.

Program administration

Overview

An ACSA vessel is issued an ACSA Exemption Letter that is valid for a period of two years. This letter states the date the vessel completed the ACSA inspection and the expiration date of the exemption:

- a mid-period examination must be completed two months either side of the mid-period due date listed in the letter to ensure compliance with the ACSA program requirements listed in this document, and when complete, the exemption letter will be endorsed confirming the completion of this examination.
- an annual Certificate of Compliance examination to ensure the vessel is in compliance with Commercial Fishing Vessel Safety and pollution requirements, and when complete, the exemption letter will be endorsed confirming the completion of this examination.

ACSA vessels must also undergo a Hull Examination twice every five years, with no Hull Examinations exceeding three years. Hull Exams may be done prior to the due date but cannot exceed the due date.

Requesting an initial ACSA Exemption Letter

The operator of a vessel in the H&G Fleet has the burden of applying for an exemption under [46 CFR 28.60](#) and justifying the manner in which “*the safety of the vessel and those on board will not be adversely affected.*”

Owners/operators who request an exemption under the ACSA Program are admittedly not fully in compliance with [46 CFR Part 28](#) and 46 CFR Subchapter E until a final exemption letter under [46 CFR 28.60](#) is issued. To clarify vessel status while in pursuit of exemptions discussed in the ACSA Program and to memorialize the owner’s/operator’s commitment to the ACSA Program, a letter stating the terms and conditions of continued vessel operations will be issued by the appropriate District Commander for each vessel at the earliest opportunity after the vessel enters the Program.

Request for renewal of the ACSA Exemption Letter

A request to remain in the ACSA Program and issuance of a new ACSA Exemption Letter must be made 60 days prior to the expiration date listed in the body of the ACSA Exemption Letter. Renewal examinations may be done prior to the expiration date but cannot exceed the expiration date. Request for renewal letters must include the operator’s written consent to permit Coast Guard Marine Inspectors aboard for initial, mid-period, and hull examinations to ensure continued compliance with exemption letter requirements. The renewal letter should state that the vessel continues to remain in compliance with the ACSA Implementation Guidance. See example request for renewal letter in [Annex 4](#).

District Commanders will consider each application on a vessel-by-vessel basis. The unique design, vessel history, operational features, and experience in the ACSA Program of each vessel will be considered. Additionally, at the District Commander’s discretion,

the safety history of the vessel before and after enrollment should be considered prior to re-enrollment into the program.

Requesting mid-period examinations

Operators should contact the Coast Guard and arrange for a mid-period examination within two months either side of the mid-period due date listed in the letter.

Exemption letters

An exemption letter is valid for no more than two years from the date of issue.

Revocation of an exemption letter

At any time the Coast Guard discovers that a vessel previously granted an exemption is not in compliance with the letter, the District Commander may, on a case-by-case basis, either disenroll the vessel from the ACSA Program or prohibit the vessel by an appropriate operational control from producing any products listed in Annex 1 as “Beyond Minimal Processing.” Commandant CG-5433 must be notified by message in all such cases. Vessels failing to complete the required mid-period examinations or required hull examinations on time are examples of non-compliance with the ACSA requirements.

Appeals: In accordance with [46 CFR 1.03-25](#), owners have the right to appeal the decision of the District Commander to Commandant CG 543.

Documentation and Recordkeeping

Sector Seattle will act as the central repository of vessel plans, files and other records. In addition, documents such as stability books, stability addendums, deadweight surveys, worklists, and loadline certificates will be electronically scanned and added to a vessel’s MISLE (Marine Information for Safety and Law Enforcement) record.

Vessel representatives can schedule a visit with the local Sector to review the vessel’s records in MISLE.

ACSA inspectors shall endeavor to enter inspection results and narratives in MISLE within two weeks of the activity, or sooner if necessitated by the vessel’s movement to another OCMI zone.

Safety Considerations

Both 46 CFR 28.60 and 46 U.S.C. § 5108 (a)(2) state that exemptions may be granted by the District Commander, *provided that good cause exists for the exemption and that the safety of the vessel and those on board will not be adversely affected*. Consequently, the District Commander may exempt a fish processing vessel from the provisions for vessel classification as described in [46 CFR 28.720](#).

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The regulations, 46 CFR Subchapter E – Load Lines also apply to fish processing vessels. The regulations for load lines are separate from those requiring classification. The same parties have been delegated authority to issue Load Line Certificates on behalf of the Coast Guard. Load Line Certificates may be issued to vessels regardless of classification status. The latitude in granting exemptions in [46 CFR 28.60](#) does not extend to load lines. However, exemption may be granted as authorized by [46 U.S.C. 5108\(a\)](#) as explained in [Annex 4](#). The Coast Guard chose to take advantage of this provision for the H&G Fleet in order to shape a program specific to the H&G Fleet. Commandant CG-5 has determined that vessels in compliance with the ACSA Program demonstrate a level of safety appropriate for this fleet when all Program elements are met.

The safety of the H&G Fleet, with over 1200 persons aboard these vessels, is of utmost importance to the Coast Guard. The H&G Fleet operates in highly regulated fisheries managed by the North Pacific Fisheries Management Council overseen by the National Marine Fisheries Service of the National Oceanic and Atmospheric Administration. The Coast Guard has no desire to disrupt existing NMFS fishery management plans that concentrate primarily on ensuring sustainable fisheries. Therefore, working in consultation with H&G Fleet representatives, the ACSA Program was developed.

American Bureau of Shipping (ABS) rules for classification and Coast Guard 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. Vessels considered for the ACSA Program have an extensive operating history.

Vessels with the H&G Fleet 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 watertight closing devices and vessel loading practices are most consistently related to vessel losses. These are principally load line and vessel stability issues.

ACSA requires that vessels without a loadline provide Stability Instructions to specify the location of a loading mark on each side of the hull. These loading marks are determined by the greatest freeboard required by the stability criteria for the “worst” loading condition. In addition, the Stability Addendum provides the Coast Guard and the owner specific guidance to ensure that necessary watertight integrity is maintained.

The importance of periodic examinations by an outside authority, which is an integral part of both classification and load line regulations, however, cannot be overlooked. These premises as well as significant issues identified in recent casualties have been considered in the development of these proposed requirements. For enrollment in the ACSA Program, operators voluntarily agree to comply with appropriate safety standards which will improve watertight integrity, vessel stability, fire prevention, machinery maintenance, lifesaving equipment usage, and crew member training. The Coast Guard has gone to great lengths to develop a regime that will provide a level of safety appropriate for the H&G Fleet. While ACSA Program elements differ from the

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requirements of classification and Load Lines, many provisions of the Program rely on and in many cases approximate those standards.

What to expect

Coast Guard Role in ACSA Compliance

It is the Coast Guard's aim to provide a high degree of engagement with and oversight of the ACSA Program until such time that the 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. The Thirteenth and Seventeenth Coast Guard District Commanders will provide uniform compliance and oversight with Sections (A)-(L) of this document. Full compliance with the ACSA will be achieved when a letter of exemption is issued by the appropriate District Commander allowing an existing H&G Fleet vessel to operate as fish processing vessel.

Role of Approved 3rd Party Organizations

Representatives of 3rd party organizations can conduct the required annual Certificate of Compliance examination. [Annex 2](#) provides a guide on who may perform verification tasks as part of the ACSA Program.

ACSA Inspection Requirements

Vessels enrolled in the ACSA Program must complete a mid-period inspection for compliance with Sections A through L of this document as applicable (See Section A in the “Discussion” Section and [Annex 2](#)).

Emergency drills as required by [46 CFR 28.270](#) and [Sec K](#) of this document, will be a part of the ACSA exam and must be performed to the satisfaction of the attending Marine Inspector, so long as that person is a Coast Guard approved drill conductor.

Certificates of Compliance

Vessels enrolled in the ACSA Program must maintain on board a valid copy of the Certificate of Compliance (COC) issued by the ABS, DNV or an approved 3rd Party examiner annually, which verifies compliance with [46 CFR Part 28](#) (Commercial Fishing Vessel Safety Regulations) and 33 CFR Parts 151 and 155 (applicable pollution regulations), (see [Coast Guard Commercial Fishing Vessel Safety Examination Booklet \(CG-5587\)](#) and [Supplement \(CG-5587B\)](#)). The exam of these items may also be conducted by the Coast Guard annually. In this case the ACSA Exemption Letter issued by the District Commander will be endorsed as satisfying the requirement for having a COC and requires that a re-inspection be conducted within two months either side of the anniversary date. A re-inspection signature block on the ACSA Exemption Letter will be provided that will be endorsed by the attending Coast Guard representative confirming that the annual COC was completed.

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Annual Meetings

On an annual basis, District 13 (dp) shall coordinate with District 17 (dp) to meet with Commandant CG-5433, industry representatives, and owners and operators to evaluate the effectiveness of the ACSA Program.

Modifications to the ACSA Examination Standards

It is anticipated that the extensive examination of vessels will identify safety issues needing to be addressed in the ACSA Program. Changes and adaptations to the ACSA standards may be made so long as the ACSA standards continue to provide an appropriate level of safety.

Proposed changes to the ACSA inspections standards will normally be presented at the annual meeting of ACSA stakeholders for discussion. Proposed changes will be provided in writing at least 60 days prior to the meeting. All stakeholders will have 30 days after the meeting to provide a written response to the 13th District Commander.

In certain urgent cases, changes to the ACSA inspection requirements may not be held for discussion at the annual ACSA meeting. The Coast Guard will send a notice of proposed changes via e-mail to all ACSA stakeholders for comment. All stakeholders will have 30 days to provide a written response to the 13th District Commander. The District Commander will schedule a meeting for the purposes of public comment as needed.

It is possible that immediate changes, required by Commandant, may occur as the result of casualty investigations, and there may not be opportunity for comments from stakeholders.

Lessons learned are inevitable and all parties should recognize the benefits of revisiting ACSA Program requirements.

A [summary of modifications](#) will record changes to the ACSA examination standards.

Updates to Fish Product Guide

Annex 1 was developed for the Head and Gut Fleet and is not all inclusive. As industry practices change, or should questions arise, the District Commander will evaluate the operation for a determination and forward a recommendation to Commandant for determination.

Full Compliance

The Thirteenth and Seventeenth District Commanders shall provide oversight to ensure full compliance with Sections (A)-(L) of this agreement. Compliance will be achieved when an exemption letter is issued biennially by the appropriate District Commander allowing an H&G Fleet vessel to operate as a fish processing vessel producing products listed in Annex 1 as “Beyond Minimal Processing.”

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ACSA Examination Personnel

It is expected that Coast Guard personnel engaged in ACSA examination activities will act within the scope of their qualifications. Items required by [46 CFR Part 28](#), Subparts B and C may be completed by qualified CFVS Examiners. Drill compliance in Section (K) can be verified by a Marine Inspector or CFVS Examiner who has completed a Coast Guard Approved Drill Conductor class. Sections (A) through (J), and (L) are to be completed to the satisfaction of the attending Marine Inspector acting within the authority of his or her qualifications.

Correction of Deficiencies & Enforcement

Following entry into the ACSA Program, a 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 OCMI. Failure to correct these deficiencies may result in disenrollment from the ACSA Program, or an appropriate prohibition from producing any fish products listed in [Annex 1 as “Beyond Minimal Processing.”](#) The goal of the ACSA Program is to provide a reasonable amount of time 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 a deficiency immediately if, in the opinion of the Coast Guard, such a condition is determined to be especially hazardous to the crew, vessel, or the environment.

As vessels are progressing toward full initial ACSA compliance, all deficiencies are to be captured on a worklist. Once a vessel is issued an exemption letter, any future deficiencies will be documented with an ACSA Deficiency Report (akin to the CG-835). An appropriate compliance date will be assigned, and details documented in MISLE as a deficiency.

Appeals: Owners have the right to appeal the decision of the attending Marine Inspector to the OCMI for that zone. In accordance with [46 CFR 1.03-20](#), owners have the right to appeal the decision of the OCMI to the District Commander. In accordance with [46 CFR 1.03-25](#), owners also have the right to continue to appeal the decision of the District Commander to Commandant CG 543.

References

References made to the ABS Rules for Building and Classing Steel Vessel Under 90 meters are as per the 2009 edition. Access to the ABS rules can be accomplished by going to the ABS web site www.eagle.org, select “Resources” > “Rules and Guides” > “Downloads” > “ABS Rules for Building and Classing Steel Vessel Under 90 meters”. Access to the rules are available for free after completing the registration form online.

All references are as promulgated as of June 2009 unless otherwise noted in this document. An electronic version of this document is available with active hyperlinks for each reference. References are those in affect as of June 2009. Electronic copies of the document with references can be obtained by contacting the 13th Coast Guard District Office.

Section A - Administration

Checklist

	Interval	References
A - Administration		
<input type="checkbox"/> 1. Completion of Annual Certificate of Compliance (COC) Exam <ul style="list-style-type: none"> <input type="radio"/> a. If conducted by a 3rd party organization <ul style="list-style-type: none"> <input type="checkbox"/> (1) Confirm a valid COC was issued in the last year. <input type="radio"/> b. If conducted by the Coast Guard <ul style="list-style-type: none"> <input type="checkbox"/> (1) Exemption letter will be endorsed as satisfying the requirement for having a COC certifying that the requirements of 46 CFR Part 28 have been met. <input type="checkbox"/> (2) If a reinspection, the Coast Guard Exemption Letter will be endorsed to confirm that an annual COC exam was completed. 	Annually	ACSA Agreement Compliance Matrix Annex 2

Section B - Stability

Checklist

	Interval	References
B - Vessel Stability	Annually	
<input type="checkbox"/> 1. Stability Instructions	Annually	
<input type="radio"/> a. Not greater than 5 years since last inclining or verification of stability by deadweight survey.		46 CFR 28.530
<input type="radio"/> b. Examine loading mark located on side of vessel to ensure they match the locations as described in the stability instructions.		As per original ACSA agreement section B.1
<input type="radio"/> c. Examine instructional addendum to stability instruction to ensure it describes each of the following:		As per original ACSA agreement section B.2(b)
<input type="checkbox"/> (1) Lists each:		
(a) Watertight bulkhead.		
(b) Watertight closure to include size and type of closures.		
(c) Weather-tight closure to include the type, size, coaming and vent heights and location to identify any automatic closure devices and operating stations of each of the following located on the main deck or above.		
• Doors,		
• Hatches,		
• Scuttles,		
• Chutes,		
• Tank vents,		
• Ventilation devices.		
<input type="checkbox"/> (2) Listing of all sea valves		As per original ACSA agreement section B.2(c)
(a) Includes location, size, type and remote operators if any		
• Hull freeboard,		
• Underwater body.		
<input type="checkbox"/> (3) Factory Sump Pumps		As per original ACSA agreement section B.2(d)
(a) Examine calculations to ensure sufficient capacity on each side of the vessel of twice the inflow into the factory as determined by a naval architect.		
(b) If no sump pumps are used because freeing ports and /or scuppers are used, this must be listed in the stability addendum.		
• Addendum must list size and number of freeing ports and drain lines.		

Discussion

Stability

The requirements of [46 CFR Part 28 Subpart E--Stability](#) are applicable, regardless of enrollment in the ACSA Program. Depending upon the date of any vessel modifications or major conversion, the requirements of [46 CFR 28.530](#) may apply. **Each application for exemption under [46 CFR Part 28.60](#) should present a history of the vessel's modifications and/or major conversions.**

Lightweight Determination

Upon entering the ACSA Program, the vessel will have lightweight determined in accordance with [46 CFR 28.535](#).

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 \(d\)](#).

Stability Instructions

Each vessel will have on board current Stability Instructions complying with [46 CFR 28.530](#). Stability Instructions will identify the location of a maximum draft mark to be located at the vessel's mid-length and identify departure conditions to be checked prior to departure.

Stability Addendum

An addendum to the above Stability Instructions shall be prepared, and will include:

1. A list of all watertight bulkheads in the hull structure including size and type of watertight closures in each such bulkhead.
2. 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. Coamings and vent heights will be identified. Alternately, this information may be presented on deck plans and elevations. Marine Inspectors shall check the master's familiarity with the stability addendum
3. Tabulation of through-hull fittings including location, size, type, and remote operators, if any.

Processing space sump pumps

The Coast Guard recognizes that a primary ingredient in processing fish is sea water used to move the fish throughout the processing space. Introduction of water below decks can become a stability problem if not controlled adequately. In factory spaces where water is used and can accumulate, Factory Sump Pumps are required. The capacity of the Sump Pumps on each side of the vessel must be capable of dewatering at the rate of water

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introduced into the factory space. Calculations must be developed as part of the stability review process to ensure adequate dewatering capacity, and included in the Addendum.

The operator of a vessel with unique arrangements that provide an equivalent level of safety and meet the intent of this requirement should include an explanation in their request for an exemption under [46 CFR 28.60](#).

If no sump pumps are used (e.g. freeing ports and/or scuppers only), this shall be identified in the Addendum, and information shall be provided as to the number and size of the freeing ports or drain lines. 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 and must be brought to the attention of the local OCMI.

Record Keeping:

Copies of Stability Instructions (including Addendums) and Inclining/Deadweight Survey will be submitted to Sector Seattle as the custodian of vessel files.

Section C – Dry-docking and internal structural exams

Checklist

	Interval	References
C - Drydock and Internal Structural Exam	2 / 5yrs 3 yrs	46 CFR 61.20-5(a)
<input type="checkbox"/> 1. Propeller(s)	2 / 5yrs 3 yrs	" "
<input type="checkbox"/> 2. Stern bushing(s)	2 / 5yrs 3 yrs	" "
<input type="checkbox"/> 3. Sea connections	2 / 5yrs 3 yrs	" "
<input type="checkbox"/> 4. Weldments	2 / 5yrs 3 yrs	NVIC 7-68 Section V
<input type="radio"/> a. Visually examine condition of all welds for		
<input type="checkbox"/> (1) Washed out welds		
<input type="checkbox"/> (2) Cracking		
<input type="checkbox"/> (3) Excess pitting/corrosion		
<input type="checkbox"/> 5. Shell plating	2 / 5yrs 3 yrs	46 CFR 61.20-5(a)
<input type="radio"/> a. Visually exam condition of all shell plating		
<input type="checkbox"/> 6. Sea chests	5 yrs	46 CFR 61.20-5(b)
<input type="radio"/> a. Open for inspection		
<input type="radio"/> b. Check all welds, plating and thru hull penetrations		
<input type="checkbox"/> 7. Sea valves	5 yrs	46 CFR 61.20-5(b)
<input type="radio"/> a. All valves within 6 inches and below of the deepest load waterline must be opened for inspection and examined.		
<input type="checkbox"/> (1) Seats		
<input type="checkbox"/> (2) Guides		
<input type="checkbox"/> (3) Body		
<input type="checkbox"/> (4) Stem		
<input type="radio"/> b. Valves must be located as close as possible to the side shell plating		ABS rules for building and classing steel vessels under 90 meters: 4-4-2/19
<input type="radio"/> c. Valves are to be steel, bronze or other approved material.		
<input type="checkbox"/> (1) Valves of ordinary cast iron are not acceptable		46 CFR 56.20-15(b)(2)(iii)
<input type="radio"/> d. Valves employing resilient material to seal must be a "Category A" valve		
<input type="radio"/> e. If butterfly valves are used, they must be of the lug type.		ABS rules for building and classing steel vessels under 90 meters: 4-4-2/19
<input type="checkbox"/> (1) Wafer-type valves are not acceptable		
<input type="checkbox"/> 8. Sea Strainers	5 yrs	46 CFR 61.20-5(b)
<input type="radio"/> a. Open for inspection and clean		
<input type="checkbox"/> 9. Valve for emergency bilge suction (if equipped).	5 yrs	46 CFR 61.20-5(b)
<input type="radio"/> a. Open for inspection and examine		
<input type="checkbox"/> 10. Internal Examination of Integral Fuel Oil Tanks	2 / 5yrs 3 yrs	46 CFR 91.43-1
(see 46CFR91.43-1 number of tanks that must be opened for inspection)		
<input type="radio"/> a. Examine all for wastage / damage of:		
<input type="checkbox"/> (1) All side shell, bulkhead and tank top plating		
<input type="checkbox"/> (2) Frames		
<input type="checkbox"/> (3) Welds		

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<input type="checkbox"/> 11. Internal examination internal spaces/voids/cofferdams/ballast tanks (see 46CFR91.41-1 number of tanks that must be opened for inspection) <input type="radio"/> a All side shell, bulkhead and tank top plating <input type="radio"/> b Frames <input type="radio"/> c Welds	5 yrs	46 CFR 91.40-3
<input type="checkbox"/> 12. Hull Markings <input type="radio"/> a. Fore and aft draft marks <input type="radio"/> b. Maximum loading mark location in terms of mid-length location by frame number and distance in inches from the molded main deck line to the bottom mark as identified in the addendum to the stability ltr <input type="checkbox"/> (1) Mark 12 inches long <input type="checkbox"/> (2) 1 inch wide <input type="checkbox"/> (3) Horizontal white line centered on listed location <input type="checkbox"/> (4) Located port and starboard side <input type="checkbox"/> (5) Permanently marked by weld bead or punch marks	2 / 5yrs / 3yrs	46 CFR 97.40-10 As per original ACSA agreement section C 5
<input type="checkbox"/> 13. Hull Repairs <input type="radio"/> a. When repairs are required to the underwater body, framing or other structural members, the cognizant OCMI must be notified <input type="checkbox"/> (1) Guidance for repairs should be in accordance with Navigation and Vessel Inspection Circular (NVIC 7-68) "Notes on Inspection and repair of Steel Hulls" and, <input type="checkbox"/> (2) Good marine practice.	When required	MSM Vol II Ch B3.B.2 NVIC 7-68
<input type="checkbox"/> 14. Ground Tackle <input type="radio"/> a. Ensure suitable for vessel. <input type="radio"/> b. Anchors and chain / wire rope are to be ranged. (1) Chain to be gauged (a.) Maximum wastage allowed is 12%	5 yrs	ABS rules for building and classing steel vessels under 90 meters: 3-5-1 ABS rules for building and classing steel vessels under 90 meters: 7-3-2-5.1.4
<input type="checkbox"/> 15. Vital System Piping Vital system is one which is essential to the safety of the vessel, its passengers and crew. <input type="radio"/> a. Must meet minimums in 46 CFR Subchapter F. <input type="checkbox"/> (1) Fuel oil for main propulsion / emergency generators <input type="checkbox"/> (2) Lubricating oil systems <input type="checkbox"/> (3) Cooling water for main propulsion / emergency generators <input type="checkbox"/> (4) Bilge and ballast systems <input type="checkbox"/> (5) Steam systems <input type="checkbox"/> (6) Starting and control air systems <input type="checkbox"/> (7) Fire main and firefighting systems <input type="radio"/> b. Materials must be as specified in subpart 46CFR56.60 <input type="radio"/> c. Welding must be with approved weld procedures <input type="radio"/> d. Exemption: existing systems can remain unless <input type="checkbox"/> (1) The piping is declared manifestly unsafe <input type="checkbox"/> (2) Piping is being repaired or replaced	Annual	46 CFR 56.07-5(f) 46 CFR 56.50-1 46 CFR 56.50-60 46 CFR 56.50-80 46 CFR 56.50-95 46 CFR 56.50-57 46 CFR 56.50-50 46 CFR 56.50-15 46 CFR 56.60 46 CFR 56.70

Repairs

Where guidance is needed for repairs to hull, framing, and other structural members, existing requirements for inspected vessels, i.e., Navigation and Vessel Inspection Circular [\(NVIC\) 7-68](#), and principles of good marine practice apply.

Ground Tackle

The anchors and chain are to be ranged, examined and the required complement and condition confirmed. The chain locker, holdfasts, hawse pipes and chain stoppers are to be examined and pumping arrangements of the chain locker operationally tested.

Chain are to be gauged and renewed in cases where their mean diameter is 12% or more below the original required nominal size.

Vital piping systems

Vital systems are those systems necessary for the safe operation of the vessel and for dealing with emergency situations. These systems include but may not be limited to:

- All steam piping;
- All fuel oil piping and tubing;
- Main engine and generator lube oil system piping and tubing;
- Main engine and generator cooling water piping;
- Starting and control air system piping and tubing;
- Fire main and fire fighting system piping and tubing; and,
- Bilge, ballast, and dewatering system piping.

Section D – Tail shaft & rudder exams

Checklist

	Interval	References
D. - Tail Shaft and Rudder Examinations		
<input type="checkbox"/> 1. Each tailshaft must be drawn and visually inspected as follows		46 CFR 61.20-18
<input type="radio"/> a. Multiple shafts	5 yrs	46 CFR 61.20-17(c)
<input type="radio"/> b. Tailshafts:	5 yrs	46 CFR 61.20-17(d)
<input type="checkbox"/> (1) with inaccessible portions fabricated of materials resistant to corrosion by sea water, or		
<input type="checkbox"/> (2) fitted with a continuous liner, or		
<input type="checkbox"/> (3) a sealing gland which prevents sea water from contacting the shaft.		
<input type="radio"/> c. Tailshafts with oil lubricated bearings	Not to be pulled	46 CFR 61.20-17(e)
<input type="checkbox"/> (1) As long as each of the following is done:		
(a) tailshaft readings	Every DDX	
(b) inboard seal assemblies examined	Every DDX	
(c) analysis of tailshaft oil lubricant in accordance with manufacturer's recommendations to determine:	Min. 6 months	
• max bearing material content,		46 CFR 61.20-17(e)(4)(ii)
• presence of other contaminants		
(d) NDT tapered tailshaft and keyway in place (if fitted)	5 yrs	46 CFR 61.20-17(e)(4)(i)
(e) NDT coupling bolts and flange for props fitted to shaft with coupling in place (if fitted)	Whenever removed	
<input type="radio"/> d. Tailshafts – All others	2 / 5 yrs 3 3yrs	46 CFR 61.20-17(b)
<input type="checkbox"/> 2. Examination requirements for all shafts as applicable		
<input type="radio"/> a. Tailshaft with fitted key		46 CFR 61.20-18(b)
<input type="checkbox"/> (1) NDT of forward 1/3 of the shafts taper section		
<input type="checkbox"/> (2) Visual inspection of entire shaft		
<input type="radio"/> b. Tailshaft with a propeller fitted by means of coupling flange		46 CFR 61.20-18(c)
<input type="checkbox"/> (1) NDT coupling flange, fillet at propeller end and coupling bolts		
<input type="checkbox"/> (2) Visual inspection of entire shaft		
<input type="checkbox"/> 3. Rudder and Rudder Shaft Examination		ABS rules for building and classing steel vessels under 90 meters part 3-2-11
<input type="radio"/> a. Ensure rudder bearing clearances are within manufacturers specifications.		
<input type="radio"/> b. Examine:		
(1) Rudder plating, weldments, water leakage.		
(2) Rudder stocks, and if fitted with a tapered stock, the keyways, keys and locking nut.		
(3) Pintles.		
(4) Gudgeons.		
(5) Coupling bolts, if fitted with flange couplings.		
(6) Rudder supporting structure, incl. skegs, fairwaters/fairings, shoe, pieces, carrier, and anti-lifting devices, if fitted.	Whenever removed	

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4. Examination requirements for tailshaft bearings.
- a. Water lubricated bearings (except rubber) must be refurbished as follows:
- (1) Propelling machinery located amidships

For shaft diameters		After stern tube bearing refurbished
Greater than	Less than or equal to	When clearance worn down to
	229 mm (9 in)	6.4 mm (0.25 in)
229 mm (9 in)	305 mm (12 in)	7.95 mm (0.3125 in)
305 mm (12 in)		9.53 mm (0.375 in)

- (2) Propelling machinery located aft

For shaft diameters		After stern tube bearing refurbished
Greater than	Less than or equal to	When clearance worn down to
	229 mm (9 in)	4.8 mm (.1875 in)
229 mm (9 in)	305 mm (12 in)	6.35 mm (0.25 in)
305 mm (12 in)		7.93 mm (0.3125 in)

- b. Rubber water lubricated bearings must be refurbished when any water groove is 1/2 the original depth.

[46 CFR 61.20-23\(a\)](#)

[46 CFR 61.20-23\(a\)\(1\)](#)

[46 CFR 61.20-23\(a\)\(2\)](#)

2 / 5 yrs ~~3~~ yrs

[46 CFR 61.20-23\(b\)](#)

Discussion

Tail Shaft Examination & Intervals

Each examination, inspection and test prescribed by these sections must be conducted in accordance with [46 CFR 61.20-15](#) in the presence of a Coast Guard Marine Inspector.

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 tail shaft examination interval.

Except as provided in paragraphs (4-5), of this section, each tail shaft must be examined twice within any 5 year period. No more than 3 years may elapse between any 2 tail shaft exams.

Tail shafts on vessels fitted with multiple shafts must be examined at an interval not to exceed once every 5 years.

Tail shafts 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.

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Accessible portions of tail shafts must be examined visually during every dry dock examination for credit.

Tail shafts 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--

1. If tail shaft bearing clearance readings are taken whenever the vessel undergoes a dry dock examination or underwater survey;
2. If the inboard seal assemblies are examined whenever the vessel undergoes a dry dock examination or underwater survey;
3. If an analysis of the tail shaft 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
4. If for tail shafts 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
5. For tail shafts 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.

Additional Tail Shaft Examination Requirements

On tail shafts 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.

On tail shafts 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

Water lubricated bearings, other than rubber, must be re-bushed as follows:

1. Where the propelling machinery is located amidship, the after stern tube bearing must be re-bushed 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.
2. Where the propelling machinery is located aft, the after stern tube bearing must be re-bushed when wear is 1.6 mm (.0625 in) less than the applicable clearance for propelling machinery located amidship.

Water lubricated rubber bearings must be re-bushed when any water groove is half the original depth.

Oil lubricated bearings must be re-bushed when deemed necessary by the OCMI. The manufacturer's recommendation shall be considered in making this determination.

Rudder and Rudder Shaft Examinations

Examine:

- rudder plating, weldments, water leakage
- rudder stocks, and if fitted with a tapered stock, the keyways, keys and locking nut.
- pintles,
- gudgeons,
- coupling bolts, if fitted with flange couplings,
- rudder supporting structure, incl. skegs, fairwaters/fairings, shoe pieces, carrier, and anti-lifting devices, if fitted.

Rudder bearing clearances are to be measured and compared to manufacturer's specifications. If specifications for metal bearings are not available, the clearance is not to be less than $d_i/1000 + 0.04$ inches on the diameter, where d_i is the inner diameter of the bushing in inches. For non-metallic bearing material, the bearing clearance is to be specially determined considering the material's swelling and thermal expansion properties, but in no case less than 0.06 inches on diameter.

Strong and effective rudder stops are to be fitted. Where adequate positive stops are provided within the gear, structural stops will not be required.

Suitable means of locking the nuts are to be provided for flange couplings. For a tapered stock coupling, the locking nut is to be fitted with an effective locking device.

Steerable Kort Nozzles and Z Drives

These systems will be handled on a case-by-case basis. Vessels with these systems will submit detailed examination procedures to the OCMI at the time of dry dock.

Section E – Hull thickness gauging

Checklist

	Interval	References
E - Hull Audio Gauging	5 yrs	
<input type="checkbox"/> 1. Periodic gauging requirement	5 yrs	As per original ACSA agreement section E
<input type="checkbox"/> 2. Gaugings shall include, but not limited to the following: <input type="radio"/> a. Three transverse sections in the midship 0.5L. <input type="radio"/> b. Internals of the fore and after peak tanks. <input type="radio"/> c. Wind and water strakes, port and stbd, full length. <input type="radio"/> d. All exposed main deck plating & superstructure deck plating. <input type="radio"/> e. Two shots on each bottom plate at the discretion of the attending Marine Inspector. <input type="radio"/> f. Sea chest plating <input type="radio"/> g. Other suspected areas throughout the hull.		ABS rules for building and classing steel vessels under 90 meters part 3-2
<input type="checkbox"/> 3. If original scantlings are not known, the owner in consultation with the accepted organization or an accredited marine surveyor or approved 3rd party shall make an estimate of the required scantling. <input type="radio"/> a. Wastage not to exceed 25% of estimated plate thickness. <input type="radio"/> b. Unless wasted plate thickness exceeds ABS minimum standards for scantling dimensions.		NVIC 7-68
<input type="checkbox"/> 4. Obtain copy of gauging report.		

Discussion

Hull Audio Gauging

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

Hull and main structural member thickness gauging should be conducted for initial consideration of exemption, and at alternating scheduled dry docks thereafter. At the discretion of the cognizant OCMI, gaugings during dry-dockings may be required more frequently. Gauging shall include, but not be limited to:

1. Three transverse sections in the midship 0.5L.
2. Internal of the fore and after peak tanks.
3. Wind and water strakes, port and starboard, full length.
4. All exposed main deck plating and superstructure deck plating.
5. At least two shots on each bottom plate at the discretion of the attending Marine Inspector.

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6. Plating of sea chest.
7. Other suspect areas throughout the hull.

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.

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.

Section F – Watertight integrity plan

Checklist

	Interval	References
F - Water tight integrity (plan submitted by owner)		
<input type="checkbox"/> 1. All watertight/weathertight closures as listed in the stability booklet <ul style="list-style-type: none"> <input type="radio"/> a. Labeled “Opening authorized for transit only – keep closed at sea”. <input type="radio"/> b. All dogs operable <input type="radio"/> c. Check for fit and watertight integrity <ul style="list-style-type: none"> (1) Chalk or light tested <input type="radio"/> d. Examine condition of seal <ul style="list-style-type: none"> (1) Not painted (2) Not badly cracked or deteriorated <input type="radio"/> e. Examine sealing edge of closure frame 	Annually	As per original ACSA agreement section F 1
<input type="checkbox"/> 2. All watertight/weathertight closures as listed in stability booklet addendum shall have administrative controls for managing the status as listed below: <ul style="list-style-type: none"> <input type="radio"/> a. Detailed preventive maintenance schedule for each of the closures listed. <input type="radio"/> b. Written instructions for at sea security watches. <ul style="list-style-type: none"> (1) Each closure listed must include required closure status for at least the following vessel conditions: <ul style="list-style-type: none"> (a) When the vessel is in transit (b) When the vessel is actively fishing/processing (c) When idle on the fishing grounds 	Annually	As per original ACSA agreement section F 2
<input type="checkbox"/> 3. Owners will develop a closure schedule and identify the places where quick acting are appropriate for the location <ul style="list-style-type: none"> <input type="radio"/> a. Particular attention should be paid to the aft 1/3 of the main deck and other locations that pose a particular risk to down flooding. <ul style="list-style-type: none"> (1) Include elements in item 2. <input type="radio"/> b. By December 2009. 	Annually	ACSA Meeting 01-Jul-08
<input type="checkbox"/> 4. If a particular hazard regarding the status of watertight or weather tight closures is identified during a vessel survey, an appropriate engineering solution shall be developed by the owner, naval architect, to the satisfaction of the OCMI.	Annually	As per original ACSA agreement section F 4

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<input type="checkbox"/> 5. Factory space high water alarms <ul style="list-style-type: none"><input type="radio"/> a. Installed in each corner of the factory<input type="radio"/> b. Alarm at water level greater than 6 inches<input type="radio"/> c. Time delay (up to 5 seconds) may be allowed.<input type="radio"/> d. Visual alarm<ul style="list-style-type: none">(1) Installed in the factory.(2) Installed at the machinery control flat.(3) Installed in the pilot house at normal piloting station instrument panel<ul style="list-style-type: none">(a) Distinctive indicator<input type="radio"/> e. Audible alarm in pilot house		As per original ACSA agreement section F 5
<input type="checkbox"/> 6. Vent Heights <ul style="list-style-type: none"><input type="radio"/> a. Ensure vent height is min 30 inches on the main freeboard deck and 17.5 inches on the superstructure deck<ul style="list-style-type: none">(1) Examine condition of closures.(2) Examine vent balls.		46 CFR 42.15-50

Discussion

Watertight and Weathertight Closures

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).

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:

1. Detailed preventive maintenance schedule for watertight and weather-tight closures.
2. Written instructions for at-sea security watches detailing periodic monitoring 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 conditions: in transit; actively fishing/processing; or, idle on fishing grounds.

Doors leading to downflooding.

The following special requirements apply to weather-tight personnel access doors located on the main deck and opening to the vessel’s interior, in the aft 1/3L of the vessel:

1. Door coamings shall be a minimum of 24 inches in height; and
2. Doors shall be six-dog “quick acting” type; or

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3. A “door ajar” alarm (both audio and visual) must be installed at the pilothouse operating station. A delay feature of up to 60 seconds may be installed to avoid interference with vessel operations.

If a particular hazard regarding the status of watertight or weather-tight closures is identified during a vessel survey, an appropriate engineering control shall be developed by the owner and/or naval architect, to the satisfaction of the OCMI.

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

Below deck watertight doors

The importance of maintaining internal subdivision watertight integrity cannot be overemphasized. Should water enter the hull unintentionally, watertight integrity below deck will maintain reserve buoyancy, possibly keeping the vessel afloat. Additionally, maintaining watertight bulkheads in their original design condition can allow time for repairs or dewatering, and protect means of escape. Watertight bulkheads also aid in controlling the spread of fire and products of combustion.

Prior to the first renewal of exemptions under [46 CFR 28.60](#), the OCMI must be satisfied that all reasonable means have been taken by the operator to ensure the original condition of watertight integrity of all bulkheads below the main deck. Vessels built before September 15, 1991 are excepted from the requirements of [46 CFR 28.580](#); however, the intent of the ACSA Program is to maintain and improve existing internal watertight subdivision. The use of Quick Acting Watertight Doors in internal watertight subdivision bulkheads is encouraged, as other types of doors in these bulkheads have proved unreliable as crewmembers tend to not properly close other types of watertight doors. Marine Inspectors will check for, and continue to address, the concerns of other bulkhead penetrations.

Hull Standards of Construction

ABS rules for Building and Classing Steel Vessels Under 90 Meters will be that accepted standard for all issues related to the watertight envelope and subdivision of vessels in the ACSA.

Modifications and repairs

Steel repairs are expected to be identical to those for inspected vessels. This standard is documented in [NVIC 7-68](#).

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Vessel modifications frequently adversely affect a vessel's stability. Each vessel modification must be accounted for in both weight and adjustment to the center of gravity. The operator's naval architect must be consulted for modifications to vessel arrangement, equipment, and fishing/processing gear.

The OCMI must be contacted prior to each modification or unplanned repair to the vessel's vital systems or watertight envelope. Each modification of a vessel must be noted in MISLE.

Section G – Machinery systems

Checklist

	Interval	References
G - Machinery Inspection		
<input type="checkbox"/> 1. Fuel System <ul style="list-style-type: none"> <input type="radio"/> a. Fuel supply piping on the pressure side must be: <ul style="list-style-type: none"> (1) Vessels > 100 GT <ul style="list-style-type: none"> (a) Seamless piping of steel, annealed copper or brass or tubing or nickel copper meeting the requirements 56.60 for materials and 56.50-70(a)(2) for thickness. (2) Vessels ≤ 100 GT <ul style="list-style-type: none"> (a) Copper, nickel copper or copper nickel <ul style="list-style-type: none"> • Minimum wall thickness .035 inches • Seamless steel pipe or tubing of equivalent level of safety may be used. <input type="radio"/> b. Non-metallic flexible hose under high pressure of at least 10 psi allowed only where flexibility is required to prevent damage from vibration. Such hose must not be more than 30 inches in length. <ul style="list-style-type: none"> (1) Fuel / hydraulic hoses must meet J-1942 or SAE J-1942-1. (2) Hose Hose fittings <ul style="list-style-type: none"> (a) Fittings must comply with SAE J-1475 (b) Push-lock fittings are not acceptable (3) Exceptions to the 30 inch rule will be allowed on a case by case basis. (4) In addition to the requirements above approved fire sleeve material as listed in the SAE qualified hose list must be over the approved hose. <input type="radio"/> c. Sight gauges on tanks <ul style="list-style-type: none"> (1) Must be welded or brazed to the tank (2) Sight gauge must be heat resistant material (3) Protected from mechanical damage (4) Both ends of sight gauge must be fitted with devices that will automatically close should the gauge break. 	<p>Annually</p>	<p>46 CFR 56.50-75(a)</p> <p>46 CFR 56.50-75(b)</p> <p>46 CFR 56.50-75(b)(3)</p> <p>46 CFR 56.50-70(b)(2)</p> <p>46 CFR 56.60-25(b)</p> <p>46 CFR 56.60-25(b)(5)</p> <p>46 CFR 58.50-10(a)(6)</p>
<input type="checkbox"/> 2. Exhaust piping within 15 feet of fuel, lube oil, or hydraulic oil sources. <ul style="list-style-type: none"> <input type="radio"/> a. Must be insulated or guarded to prevent ignition. 	<p>Annually</p>	<p>46 CFR 28.380(b)</p>
<input type="checkbox"/> 3. Diesel propulsion machinery tests <ul style="list-style-type: none"> <input type="radio"/> a. Obtain copy of the written test procedures <input type="radio"/> b. Automatic shutdown on overspeed (if installed)*. <input type="radio"/> c. Low lube oil pressure alarm. <input type="radio"/> d. High water jacket temperature alarm 	<p>Annually</p>	<p>46 CFR 58.05-10</p> <p>46 CFR Table 62.35-50</p> <p>46 CFR 58.05-10</p> <p>ABS rules for building & classing steel vessels under 90 meters:4-7-1</p>

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<input type="checkbox"/> 4. Diesel prime mover tests for generators and auxiliary equipment <ul style="list-style-type: none"> <input type="radio"/> a. Obtain copy of written test procedures <input type="radio"/> b. Automatic shutdown on overspeed (if installed)* <input type="radio"/> c. Alarm and shutdown of low lube oil pressure sensor <input type="radio"/> d. Alarm on high water jacket temperature <p>* If diesels with computer automation, provide calibration standards set by the manufacturer.</p>	Annually	46 CFR 111.12-1(c) 46 CFR 112.50-1(g)&(h)
<input type="checkbox"/> 5. Examination of test and records <ul style="list-style-type: none"> <input type="radio"/> a. At the request of the examiner the owner/operator will provide preventative maintenance records. <ul style="list-style-type: none"> (1) Examine records (2) Conduct tests and inspections as necessary to ensure safe operation of: <ul style="list-style-type: none"> (a) Main propulsion (b) Electrical generation machinery (c) Auxiliary or associated equipment 	Annually	As per original ACSA agreement section G 4
<input type="checkbox"/> 6. Fire safety hazard survey <ul style="list-style-type: none"> <input type="radio"/> a. Conduct survey of machinery spaces to identify any other fire safety hazards not covered in ACSA agreement. 	Annually	As per original ACSA agreement section G 5
<input type="checkbox"/> 7. Fuel tank vents <ul style="list-style-type: none"> <input type="radio"/> a. Inspect flame screen (minimum 30 X 30 mesh) <input type="radio"/> b. Ball check valve 	Annually	46 CFR 56.50-85(a)7&8
<input type="checkbox"/> 8. Electrical wiring on main engines <ul style="list-style-type: none"> <input type="radio"/> a. Electrical cables connecting starting batteries to main propulsion starters and, <input type="radio"/> b. Cables connecting main propulsion generator to propulsion motors <ul style="list-style-type: none"> (1) Must meet IEEE Std 45, IEC 92-3, MIL-C-24640A, or MIL-C-24643A (2) The use of electrical welding cables is not authorized 	Annually	46 CFR 111.60-1(a)

Discussion

Machinery maintenance, inspection, and testing

Analysis: These standards require a preventive 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.

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 preventive maintenance standards as established by the manufacturer or the manufacturer's authorized representative.

Fuel Systems

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.

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

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.

Examination of Records and Tests

At each inspection for continuation in this Program, a Marine Inspector may review preventive 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. 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

Electrical Systems

Electrical systems are important to the control and safety of the vessel. There is no requirement or expectation that electrical system installations will comply with the standards for inspected vessels in wiring material. There are many other features of electrical systems that can present safety issues and Marine Inspectors shall not overlook these. Marine Inspectors will not require replacement of electrical cabling and wiring without cause. Discovery of unsafe conditions may provide the cause for modifications to such equipment at the discretion of the Marine Inspector. Any changes to electrical systems shall be in accordance with requirements for inspected vessels.

Preventive Maintenance Programs

Poor maintenance of vessels watertight integrity and machinery are a leading cause of vessel loss. To reduce the risk and improve the reliability of vessel systems, a documented preventive maintenance program is required for vessels in the ACSA Program. The preventive maintenance program must at a minimum address the items in the vessels Maintenance Schedules Checklist. The approach to preventive maintenance is the operators' responsibility. Reliance on standards recommended by equipment manufacturers is highly recommended. A written plan and or schedule is required and records of compliance with the plan and repair records shall be checked by the Marine Inspector as part of scheduled visits.

Section H – Life saving equipment & arrangements

Checklist

	Interval	References
H - Life Saving Equipment		
<input type="checkbox"/> 1. Life raft launching <input type="radio"/> a. Mounted so to as to be manually launched by one person	Annually	ACSA Agreement section H 1
<input type="checkbox"/> 2. Embarkation ladders must be located at each life raft embarkation station. <input type="radio"/> a. Only required if station is greater than 5 feet above the waterline as measured from the normal operating draft.	Annually	ACSA Agreement section H 2
<input type="checkbox"/> 3. Personal Marker Lights (PML) <input type="radio"/> a. Each immersion suit is required to be fitted with a Coast Guard approved "strobe" type PML.	Annually	ACSA Agreement section H 3

Discussion

This section deals with the ability to evacuate a large crew quickly, safely, and effectively. This is not a classification requirement but meets or exceeds current inspected vessel standards.

All required liferafts will be mounted in a manner to be launched manually by a single person.

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.

Each immersion suit will be fitted with a Coast Guard or SOLAS approved strobe type PMEL lights.

Subject to individual liferaft manufacturer approval, paddles for all Coast Guard approved liferafts shall be of a material other than plastic.

Section I – Fixed fire fighting equipment & arrangements

Checklist

	Interval	References
I - Fixed Fire Fighting Equipment & Arrangements (all of 46CFR76-15 applies)		
<input type="checkbox"/> 1. Spaces requiring a fixed fire fighting system <input type="radio"/> a. Any space containing: <ol style="list-style-type: none"> (1) Internal combustion engine greater than 50 horsepower. (2) An oil-fired boiler (3) An incinerator (4) Gasoline storage tank(s) or other flammable materials (such as a paint locker) 	Annually	46 CFR 28.320(a) 46 CFR 25.30-15
<input type="checkbox"/> 2. Fixed fire fighting systems certified by a professional engineer. <input type="radio"/> a. Must certify the system is in compliance with: <ol style="list-style-type: none"> (1) 46CFR76.15 and, (2) NVIC 6-72 change 1 	Annually	46 CFR 76.15 NVIC 6-72, Ch 1
<input type="checkbox"/> 3. Spaces protected by fixed CO2 systems not more than 300 pounds <input type="radio"/> a. CO2 cylinders may be located inside the space protected <ol style="list-style-type: none"> (1) If cylinders are located inside the space protected <ol style="list-style-type: none"> (a) Heat actuator is required that will automatically operate in addition to the remote pulls. (2) If cylinders are stored in a CO2 room <ol style="list-style-type: none"> (a) Room must be well ventilated (b) Must not be located in an area where the ambient temp exceeds 130 deg F (3) Cylinders must be securely fastened and supported 	Annually	46 CFR 76.15-20(b) 46 CFR 76.15-10(a) 46 CFR 76.15-20(b) 46 CFR 76.15-20(a) 46 CFR 76.15-20 (c) 46 CFR 76.15-20(d)
<input type="radio"/> b. Controls must be located outside the space protected <ol style="list-style-type: none"> (1) Not located in an area that could be cut off or made inaccessible in the event of fire in the space in the event of fire in the space protected. (2) Complete but simple instructions for the operation of the system must be located in a conspicuous place near pull boxes and at the control station located at the cylinder location. 		46 CFR 76.15-10(a) 46 CFR 76.15-10(h)
<input type="radio"/> c. Alarm and time delay is required unless space is small and there is suitable horizontal escape from the space. <ol style="list-style-type: none"> (1) Perform functional test (2) Cylinders weighed (3) System must alarm for at least 20 seconds before CO2 is released into the space. 		46 CFR 76.15-10(f)
<input type="radio"/> d. Ventilation <ol style="list-style-type: none"> (1) Protected spaces with mechanical ventilation must automatically shutdown on activation of the CO2 system. (2) Means for closing all openings to the space protected must be provided and must be able to be accomplished from outside the space. 		46 CFR 76.15-35(a) 46 CFR 76.15-35(c)

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<p><input type="checkbox"/> 4. Spaces protected by fixed CO2 systems more than 300 pounds</p> <ul style="list-style-type: none"> <input type="radio"/> a. CO2 cylinders <u>must</u> be stored outside the space protected. <input type="radio"/> b. Controls <u>must</u> be located outside the space protected <ul style="list-style-type: none"> (1) Not located in an area that could be cut off or made inaccessible in the event of fire in the space protected. (2) Complete but simple instructions for the operation of the system must be located in a conspicuous place near pull boxes and at the control station located at the cylinder location. <input type="radio"/> c. Alarm and time delay is required <ul style="list-style-type: none"> (1) Perform functional test (2) Cylinders weighed (3) System must alarm for at least 20 seconds before CO2 is released into the space. <input type="radio"/> d. Ventilation <ul style="list-style-type: none"> (1) Protected spaces with mechanical ventilation must automatically shutdown on activation of the CO2 system. (2) Means for closing all openings to the space protected must be provided and must be able to be accomplished from outside the space. 	Annually	<p>46 CFR 76.15-20(a)</p> <p>46 CFR 76.15-10(a)</p> <p>46 CFR 76.15-10(f)</p> <p>46 CFR 76.15-35(a)</p> <p>46 CFR 76.15-35(c)</p>
<p><input type="checkbox"/> 5. Pre-engineered fire extinguishing systems</p> <ul style="list-style-type: none"> <input type="radio"/> a. May be used in place of fixed CO2 systems provided they are qualified by the restrictions and standards set forth in 46 CFR 28.320 <ul style="list-style-type: none"> (1) Only in spaces less than 33.98 cubic meters (1200 cubic ft.) that are normally unoccupied. <ul style="list-style-type: none"> (a) Small main engine spaces (b) Paint / flammable storage lockers <input type="radio"/> b. Must be approved by Commandant for the intended application. <input type="radio"/> c. Capable of manual activation from outside the space in addition to any automatic actuation devices <input type="radio"/> d. Automatically shut down all power ventilation to the space protected. <input type="radio"/> e. A visible and audible alarm must sound at the vessels operating station, indicating discharge. 	Annually	<p>46 CFR 28.320(d)</p> <p>As per original ACSA agreement section I 3</p>
<p><input type="checkbox"/> 6. Heat detectors in spaces containing fixed gas fire extinguishing systems.</p> <ul style="list-style-type: none"> <input type="radio"/> a. Heat detector alarms (rate of rise / maximum temperature) must be installed in each space fitted with a fixed gas fire extinguishing system. <ul style="list-style-type: none"> (1) CG approved systems will comply with 46CFR161.002 or (2) non-CG approved systems meeting criteria listed in 46CFR27.203 are also acceptable. 	Annually	<p>As per original ACSA agreement section I 4</p>
<p><input type="checkbox"/> 7. CO2 detection system</p> <ul style="list-style-type: none"> <input type="radio"/> a. CO2 detection system installed in any accommodation space where CO2 cylinders are stored. 	Annually	<p>NFPA 12 Chap 4.3.3.1.1</p>

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<input type="checkbox"/> 8. Smoke detectors in all accomodation spaces <input type="radio"/> a. Acceptable detectors include: (1) Independent modular smoke detector. (a) Must meet UL-217 as listed as “Single Station Smoke Detector – Also suitable for use in Recreational Vehicles.” (b) Other fire / smoke/ heat detectors may be approved for use by the local OCMI. (2) Smoke actuated fire detecting unit (a) Must be installed IAW 46CFR76.33.	Annually	46 CFR 28.325
<input type="checkbox"/> 9. Structural fire protection <input type="radio"/> a. A-0 boundaries must isolate all interal combustion machinery spaces.	Annually	ACSA Agreement modified July 1, 2008
<input type="checkbox"/> 10. Non-combustable insulation. <input type="radio"/> a. Any insulation replaced in hidden spaces should be of a non-combustible material IAW 46CFR Subchapter Q. Any exceptions are at the discretion of the OCMI.		

Discussion

These standards require a Coast Guard inspected and National Fire Protection Association (NFPA) standards approved fixed fire fighting system for spaces with internal combustion engines and additional fire detection capability in the engine spaces and accommodation spaces. This standard meets existing inspected and classed vessel requirements.

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

1. A space containing an internal combustion engine of more than 50 horsepower (main and auxiliary spaces);
2. A space containing an oil-fired boiler;
3. An incinerator; or
4. A space containing a gasoline storage tank or other flammable materials (such as a paint locker).

System types and alternatives.

Vessel specific fire extinguishing system

All fixed gas fire extinguishing systems for main machinery spaces shall be installed in accordance with [46 CFR 76.15](#) and other appropriate NFPA standards. Such installations must be certified compliant by a vendor acceptable to the cognizant OCMI or by a licensed Professional Engineer.

Emergency communication equipment

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.

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.

Pre-engineered fire extinguishing system

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).

1. 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;
 - (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.

Smoke / Heat Detectors

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.

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 76.33](#). The independent modular smoke detector must meet UL 217 and be listed as a

“Single Station Smoke Detector--Also suitable for use in Recreational Vehicles.” Other fire, smoke, and/or heat detectors for accommodation spaces may be approved for use by the local OCMI.

Carbon Dioxide Detectors

In any accommodation space housing carbon dioxide storage cylinders, a carbon dioxide detector must be installed to protect the crew from the potential build up of carbon dioxide from leaking cylinders. A CO₂ detector / alarm would be acceptable if UL listed; however, there is presently no listed CO₂ detection and/or alarm equipment under the UL2075 standard. Therefore, the OCMI shall accept this gear on a case-by-case basis, or alternatively may accept an oxygen level detector. In the future, CO₂ detectors having the UL listing may be required, if the gas detection manufacturers market a listed device suitable for this application.

Fire Hazard Surveys

Machinery spaces and escape scuttles shall be maintained in reasonable state of cleanliness to reduce the risk of fire. Flammable materials shall not be stored within machinery spaces or in escape scuttles. Scheduled inspections shall include a survey in all machinery spaces and other spaces where flammable and combustible materials are stored and used. At each inspection a Coast Guard Marine Inspector or dockside examiner 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.

Notwithstanding the need for crew to conduct normal operations, special attention shall be given to maintaining adequate egress paths from all compartments.

A-0 Boundaries

Since machinery spaces are a common source of fire aboard vessels, it is standard practice to design machinery space bulkheads to prevent the passage of smoke and flame. This contains fires that may start within these spaces and allows time for fixed extinguishing systems to be activated or other fire fighting efforts. The longer a vessel has been in service, the more likely that bulkheads isolating machinery spaces have been breached. These breaches allow fire and smoke to spread to other compartments and impair the effectiveness of fixed extinguishing agents.

A-0 bulkheads or decks must be composed of steel or equivalent material, suitably stiffened and made intact with the main structure of the vessel, such as the shell, structural bulkheads, and decks. They must be so constructed that, if subjected to the standard fire test, they are capable of preventing the passage of smoke and flame for 1 hour. It is the intent of this requirement to assure there is a intact steel bulkhead in all machinery spaces while recognizing that many ACSA vessels have bulkheads in machinery spaces that have polyurethane foam insulation on the opposite side of the bulkheads. Engine rooms and cargo holds share common bulkheads in standard ACSA vessel configurations.

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Accepted methods of passing cables and piping through machinery space decks and bulkheads are often not used in an effort to save time and money or because conditions during repair do not permit proper penetrations to be used. The risk posed by these unsafe penetrations shall be reduced at the earliest opportunity. Marine Inspectors shall ensure that machinery space bulkheads and decks remain intact at each penetration. Penetrations that are discovered non-tight shall be required to be repaired within a reasonable time.

All closures and vents in A-0 boundaries shall be constructed of steel or equivalent material. All closures and vents shall be capable of being secured manually from outside the space.

Section J – Other Fire Fighting & Safety Equipment Checklist

	Interval	References
J - Other Fire Fighting and Safety Equipment		
<input type="checkbox"/> 1. Portable fire/dewatering pump <ul style="list-style-type: none"> <input type="radio"/> a. Must be independently powered <input type="radio"/> b. Must be stowed outside the engine room <input type="radio"/> c. Fitted with sufficient suction hose to reach water from highest lift. <input type="radio"/> d. Sufficient 1.5 inch fire hose to reach any part of the vessel <ul style="list-style-type: none"> (1) Hose(s) fitted with nozzle of corrosion resistant material. <ul style="list-style-type: none"> (a) Nozzle must be dual purpose capable of providing solid or straight stream, and spray pattern. <input type="radio"/> e. Pump must be capable of producing two effective 40 foot streams from standard 1.5 inch fire hose. 	Annually	As per original ACSA agreement section J 1 As per original ACSA agreement section J 2 As per original ACSA agreement section J 3
<input type="checkbox"/> 2. Fireman’s Outfits. <ul style="list-style-type: none"> <input type="radio"/> a. Vessels with less than 26 people on board shall have 2 outfits. <input type="radio"/> b. Vessels with 26 or more people on board shall have 4 outfits. <input type="radio"/> c. Fireman’s outfit shall include <ul style="list-style-type: none"> (1) One positive pressure self contained breathing apparatus (SCBA) <ul style="list-style-type: none"> (a) With attached lifeline (2) Protective clothing with retro-reflective tape (3) Rigid helmet (4) Gloves (5) Boots (6) Fire axe (or other appropriate tool) <input type="radio"/> d. Each SCBA will be provided with two spare air bottles. 	Annually	As per original ACSA agreement section J 4&5 46 CFR 96.35
<input type="checkbox"/> 3. Crew training <ul style="list-style-type: none"> <input type="radio"/> a. Fire team members (as identified on the Emergency Instructions as required by 46 CFR 28.265) who will wear the fireman’s outfits shall provide proof of Coast Guard approved basic fire training. 	Annually	As per original ACSA agreement section J 6
<input type="checkbox"/> 4. Fire and Safety Plan <ul style="list-style-type: none"> <input type="radio"/> a. Up to date Fire and Safety Plans <ul style="list-style-type: none"> (1) General arrangement plans showing <ul style="list-style-type: none"> (a) Each control station <ul style="list-style-type: none"> Control stations for controlling ships radios, main navigation, emergency power, and where fire reporting and fire control equipment are centralized. (b) Location of fire resisting bulkheads. (c) Location of alarms. (d) Location of extinguishing systems. (e) Location of portable fire extinguishers. (f) Means of access to different compartments and decks. (g) Ventilation system and location of ventilation shutdowns and dampers. (h) Details of alarms systems. (i) Details of extinguishing systems. 	Annually	As per original ACSA agreement section J 7 46 CFR 91.55-5(d)
<input type="checkbox"/> 5. Freon detectors (as required). <ul style="list-style-type: none"> <input type="radio"/> a. Installed in spaces where freon is used or stored. <input type="radio"/> b. Portable freon detectors should also be on board. 	Annually	ACSA agreement modified July1, 2008

Discussion

Fire Fighting Equipment

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.

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.

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.

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 or straight stream, and a spray pattern.

Each vessel with less than 26 people on board must be equipped with a minimum of (2) traditional bunker style fireman's outfits. 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](#).

1. 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.
2. At least two spare air bottles will be provided for each self-contained breathing apparatus.
3. Each SCBA must be positive pressure and approved by MSHA and NIOSH and have a minimum 30 minute air supply and a full face mask.

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 complete Coast Guard approved basic fire-fighting training.

Fire Fighting Plans

Each vessel must have Fire and Safety Plan which shows the location of all safety equipment and fire fighting equipment. Marine Inspectors shall ensure its accuracy at each inspection.

Freon Detectors

Freon Detectors are only required when Freon is used in freezer hold systems and will not be required when Freon is used in small applications such as commercial refrigerators and air conditioners.

Section K – Emergency drills & training Checklist

	Interval	References										
<p>K - Emergency Drills</p> <p><input type="checkbox"/> 1. As part of the ACSA annual exam, drills must have been conducted in the presence of an attending marine inspector.</p> <p>a. The examiner must be a Coast Guard approved drill conductor.</p> <p>b. The drills must be conducted with the vessel's crew on board.</p> <p>c. The drills should include:</p> <p><input type="radio"/> (1) Abandon ship</p> <p>(a) Launching survival craft</p> <p>(b) Donning immersion suits or PFDs</p> <p>(c) Making voice radio distress calls / using visual distress signals.</p> <p>(d) Activating general alarm</p> <p>(e) Reporting inoperative alarm & fire detection systems</p> <p>(f) Minimizing effects of accidental flooding</p> <p><input type="radio"/> (2) Fighting a fire</p> <p>(a) Donning Firemans outfits / SCBAs if equipped.</p> <p>(b) Making voice radio distress calls</p> <p>(c) Activating general alarm</p> <p>(d) Reporting inoperative alarm & fire detection systems</p> <p><input type="radio"/> (3) Recover person overboard</p> <p>(a) Activating general alarm</p> <p>(b) Reporting inoperative alarm & fire detection systems</p>	Annually	<p>46 CFR 28.270</p> <p>46 CFR 28.275</p>										
<p><input type="checkbox"/> 2. Required number of qualified drill conductors in crew complement</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th># crew on vessel</th> <th>Minimum # of qualified Drill Conductors</th> </tr> </thead> <tbody> <tr> <td>15 or less</td> <td>2</td> </tr> <tr> <td>16-25</td> <td>3</td> </tr> <tr> <td>26-35</td> <td>4</td> </tr> <tr> <td>36 or more</td> <td>5</td> </tr> </tbody> </table>	# crew on vessel	Minimum # of qualified Drill Conductors	15 or less	2	16-25	3	26-35	4	36 or more	5	Annually	<p>As per original ACSA agreement section K 1-4</p>
# crew on vessel	Minimum # of qualified Drill Conductors											
15 or less	2											
16-25	3											
26-35	4											
36 or more	5											
<p><input type="checkbox"/> 3. Record keeping of emergency drills and training</p> <p><input type="radio"/> a. Logged by the master</p> <p><input type="radio"/> b. Includes date of each drill</p> <p>(1) Conducted not more than 30 days from previous drill.</p> <p>(2) Log should indicate those that did not participate and why.</p> <p>(3) Must be maintained on board for 1 year and in the main office for 3 years.</p>	Annually	<p>As per original ACSA agreement Section K 6</p>										
<p><input type="checkbox"/> 4. Communications among crew</p> <p>a. If crew or process workers includes non-English speaking members</p> <p><input type="radio"/> (1) Vessel has tapes/CDs that provide training on emergency procedures in the language spoken.</p> <p>(a) Training tapes/CDs similar to AMSEA or NPFVOA safety videos.</p>		<p>As per original ACSA agreement Section K 5</p>										

Discussion

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.

Each vessel must have on board the number of certified Drill Conductor required by the table below.

Persons on board	Certified Drill Conductors
Less than 16	2
16-25	3
26- 35	4
More than 35-	At least 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.	

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.

Logging of drills

All emergency drills and training shall be logged by the master of the vessel. Emergency drill log entries must include the name and reason for missing the drill for each person not participating in an emergency drill. Emergency drills and training records shall be maintained on board the vessel and at the vessel's home office for three years.

ACSA Implementation Guidance

Frequency of drills

Emergency drills shall be conducted at least once each 30 days and must cover all contingencies listed in [46 CFR 28.270](#). Additionally, drills must be conducted anytime a person with safety responsibilities is replaced. Within each 30 days each person on board must have received training complying with [46 CFR 28.270](#).

Orientation of new members

The requirements for orientation of new persons on board is in [46 CFR 28.270](#).

Section L – Emergency communication and navigation

Checklist

	Interval	References
L – Emergency Communications and Navigation		
<input type="checkbox"/> 1. Notification prior to discharging fixed CO2 systems into the engine room. <ul style="list-style-type: none"> <input type="radio"/> a. If vessel policy requires notification of the master <ul style="list-style-type: none"> (1) Must have installed communication system between CO2 activation control station and wheelhouse. <ul style="list-style-type: none"> (a) Emergency handheld radios may be used to meet this requirement. <ul style="list-style-type: none"> • Must be located on bridge, and • At fixed fire extinguisher system control station. 	Annually	As per original ACSA agreement Section L 1
<input type="checkbox"/> 2. Procedures for activating the main engine room fixed extinguishing system. <ul style="list-style-type: none"> <input type="radio"/> a. Clear written procedures established. <input type="radio"/> b. Signed by Master and Chief Engineer. 	Annually	As per original ACSA agreement Section L 2
<input type="checkbox"/> 3. Automatic Identification System (AIS) <ul style="list-style-type: none"> <input type="radio"/> a. Fish processing vessels greater than 65 feet must have an approved AIS installed and operational. 	Annually	33 CFR 164.46
<input type="checkbox"/> 4. Global Maritime Distress Signal System (GMDSS) <ul style="list-style-type: none"> a. Fish Processing Vessel 300 GT and over. <ul style="list-style-type: none"> <input type="radio"/> (1) Search and Rescue Transponder (SART) <ul style="list-style-type: none"> (a) < 500 GT 1 SART (b) ≥ 500 GT 2 SARTs <input type="radio"/> (2) 3 VHF handheld transceivers <ul style="list-style-type: none"> (a) Must operate on channel 16 and one other channel. <ul style="list-style-type: none"> • Channel 6 recommended (b) NOTE: A transceiver permanently installed in an liferaft may be counted toward this requirement. <input type="radio"/> (3) 2 VHF radio installation <ul style="list-style-type: none"> (a) Capable of operating on: <ul style="list-style-type: none"> • Channel 6 (156.3 MHz), • Channel 13 (156.65 MHz) • Channel 16 (156.8 MHz) <input type="radio"/> (4) 1 MF radio installation (Single Side Band) <ul style="list-style-type: none"> (a) Capable of operating on: <ul style="list-style-type: none"> • 2182 kHz, • & 2 other frequencies between (1605-3500 kHz) <input type="radio"/> (5) 1 NAVTEX receiver. 	Annually	NVIC 3-99 Table 5
		47 CFR 80.1095(b)
		47 CFR 80.1095(a)
		NVIC 3-99 Table 5
		47CFR80.855
		47CFR80.1085(a)(4)

Discussion

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.

ACSA Implementation Guidance

Portable communication equipment

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.

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](#).

Automatic Identification System (AIS)

In accordance with [33 CFR 164.46](#), all vessels must be equipped with a properly installed and operational AIS system.

Annex 1 – Product Codes

The products listed below are identified by the National Marine Fisheries Service regulations 50 CFR, Part 679, Table 1. These products are typical of the Head & Gut fleet.

Product codes designated “H&G” are not considered processing. A vessel that produces these products does not need to enter the ACSA Program.

Product codes designated as “Beyond Minimal Processing” are considered processing. Vessel enrolled in or in compliance with the ACSA Program are allowed to produce these products.

Those product codes identified as “Extensive Processing” are not allowed to be produced by vessels enrolled in or in compliance with the ACSA Program. Only fish processing vessels that are fully classed and load-lined as required by [46 CFR 28.720](#) and 46 CFR Subchapter E, or that meet the definition of being “grandfather” are allowed to produce these products.

Any other product by ACSA enrolled vessels are not authorized without special consideration and evaluation by Commandant (CG-543).

Product Code	Product Code Name	Description	USCG Determination
3	Bled Only	Throat, or isthmus, slit to allow blood to drain.	H & G
4	Gutted, Head On	Belly slit & viscera removed	H & G
5	Gutted, Head Off	Belly slit & viscera removed	H & G
6	Head & Gutted, with Roe	None	H & G
7	Headed & Gutted, Western Cut	Head removed just in front of the collar bone, & viscera removed.	H & G
8	Headed & Gutted, Eastern Cut	Head removed just behind the collar bone, & viscera removed.	H & G
13	Wings	On skates, side fins are cut off next to body	H & G
36	Mantles, Octopus or Squid	Flesh after removal of viscera & arms	H & G
42	Bled Fish destined for Fish Meal	(Includes offsite production)	H & G
97	Other Retained Product	If product is not listed on this table, enter code 97 & write a description with product recovery rate next to it in parenthesis.	Determination on a Case by Case Basis

ACSA Implementation Guidance

10	Headed & Gutted, Tail Removed	Head removed usually in front of collar bones, viscera & tail removed	Beyond Minimal Processing
11	Kirimi (Steak)	Head removed either in front or behind the collar bone, viscera removed, & tail removed by cuts perpendicular to the spine, resulting in a steak.	Beyond Minimal Processing
14	Roe	Eggs, either loose or in sacs, or skeins (Ancillary only)	Beyond Minimal Processing
15	Pectoral Girdle	Collar bone & associated bones, cartilage & flesh	Beyond Minimal Processing
16	Heads	Heads only, regardless where severed from body (Ancillary only)	Beyond Minimal Processing
17	Cheeks	Muscles on side of head (Ancillary only)	Beyond Minimal Processing
18	Chins	Lower jaw (mandible), muscles, & flesh (Ancillary only).	Beyond Minimal Processing
34	Milt	In sacs, or testes (Ancillary only)	Beyond Minimal Processing
35	Stomachs	Includes all internal organs (Ancillary only)	Beyond Minimal Processing
97	Other Retained Product	If product is not listed on this table, enter code 97 & write a description with product recovery rate next to it in parenthesis.	Determination on a Case by Case Basis
12	Salted & Split	Head removed, belly slit, viscera removed, fillets cut from head to tail but remaining attached near tail. Product salted.	Extensive Processing
19	Belly Flaps	Flesh in region of pelvic & pectoral fins & behind head (Ancillary only)	Extensive Processing
20	Fillets with Skin & Ribs	Meat & skin with ribs attached, from side of body behind head & in front of tail.	Extensive Processing
21	Fillets with Skin, no Ribs	Meat & skin with ribs removed, from side of body behind head & in front of tail.	Extensive Processing
22	Fillets with Ribs, no Skin	Meat with ribs with skin removed from sides of body behind head & in front of tail.	Extensive Processing
23	Fillets, Skinless / Boneless	Meat with both skin & ribs removed, from sides of body behind head & in front of tail.	Extensive Processing
24	Fillets, Deep-Skin	Meat with skin, adjacent meat with silver lining, & ribs removed from sides of body behind head & in front of tail, resulting in thin fillets.	Extensive Processing
30	Surimi	Paste from fish flesh & additives	Extensive Processing
39	Bones	(If meal, report as 32) (Ancillary only)	Extensive Processing
97	Other Retained Product	If product is not listed on this table, enter code 97 & write a description with product recovery	Determination on a Case by Case

Annex 2 – Compliance Matrix

Section	Section Title	USCG District Commander	Accepted Organization (ABS / DNV)	Surveyor from a Similarly Qualified Organization	USCG Marine Inspector	USCG Fishing Vessel Examiner	Naval Architect
A	ACSA Enrollment (Exemption Letter)	<i>Every two years</i>					
A	ACSA Exemption Renewal Examination				<i>Every Two Years</i>		
A	ACSA Mid-period Examination				<i>Annually</i>		
A	Certificate of Compliance or Coast Guard exam to include (46 CFR 28) (33 CFR 151 & 155)		<i>Annually</i>	<i>Annually</i>	<i>Annually</i>	<i>Annually</i>	
B	Stability Tests & Reports		<i>5 Years</i>				<i>5 Years</i>
C	Drydock / Internal Structural Exam				<i>Twice in 5 Years, NTE 3 Years</i>		
D	Tail Shaft Exam				<i>5 Years</i>		
E	Hull Audio Gauging				<i>5 Years</i>		
F	Watertight & Weather-tight Closures				<i>Annually</i>	<i>Annually</i>	
G	Machinery Inspection				<i>Annually</i>		
H	Life Saving Arrangements				<i>Annually</i>	<i>Annually</i>	
I	Fixed Fire Fighting Arrangements				<i>Annually</i>	<i>Annually</i>	
J	Other Fire Fighting Equip & Plans				<i>Annually</i>	<i>Annually</i>	

Annex 3 – Grandfathered Fish Processing Vessels

Grandfathered Fish Processing Vessel:

In order for a fish processing vessel to be considered grandfathered and therefore not required to meet the provisions of [46 CFR Part 28 Subpart F](#), the vessel must meet the following:

Loadline

For domestic voyages ([46 U.S.C. 5102\(b\)\(4\)](#)), a fish processing vessel of not more than 5,000 gross tons must have a valid Load Line Certificate or must be exempted from the requirement to have a Load Line Certificate by meeting one of the following conditions:

- A. The vessel must have been **constructed** as a fish processing vessel before August 16, 1974 ([46 U.S.C. 5102\(b\)\(4\)\(A\)\(i\)](#)); or
- B. The vessel must have been **converted** for use as a fish processing vessel before January 1, 1983 ([46 U.S.C. 5102\(b\)\(4\)\(A\)\(ii\)](#)), or
- C. The vessel must be **150 gross tons or less** ([46 U.S.C. 5102\(b\)\(10\)](#)), and had the keel laid or constructed as a fish processing vessel before January 1, 1986 ([46 U.S.C. 5101\(3\)](#)).

Classed

The vessel must have a valid certificate of class or must be exempted from the survey and classification requirements ([46 U.S.C. 5102\(b\)](#)). In order for a vessel to be exempted from the survey and classification requirement:

- The vessel must have been **built as** or **converted** to a fish processing vessel on or before July 27, 1990, and not undergone a major conversion^{1*}.

Maintaining Grandfather status:

The District Commander will determine whether a vessel is eligible for grandfathered status on a case-by-case basis. In order for a fish processing vessel to maintain grandfather status the vessel must not have converted the use of the vessel to any other type. If at any time the vessel which was operating as a fish processing vessel changed the “type of vessel ([46 U.S.C. 2101\(14a\)\(B\)](#))” to that of a fishing vessel (not processing) or a fish tender vessel (not processing), after any of the above thresholds, the vessel will be considered to have undergone a major conversion and the eligibility for grandfather status would be invalid.

¹ Under [Title, 46 U.S.C. 2101\(14a\)](#) a “major conversion” means a conversion of a vessel that:

- (A) Substantially changes the dimensions or carrying capacity of the vessel;
- (B) **Changes the type of the vessel;**
- (C) Substantially prolongs the life of the vessel; or
- (D) Otherwise so changes the vessel that it is essentially a new vessel.

Annex 4 – Sample Renewal Request Letter

Git 'Er Done Fisheries, Inc.
P. O. Box 12345
Seattle, Washington 98123

November 21, 2009

Commander (dpi)
Attn: Commercial Fishing Vessel Safety Coordinator
Thirteenth Coast Guard District
915 Second Avenue, Suite 3506
Seattle, WA 98174

Dear Sir:

I am requesting renewal of your March 24, 2008 letter granting exemption for 46 CFR Part 28.720 requiring the vessel to be classed by the American Bureau of Shipping or a similarly qualified organization, and from 46 CFR Subchapter E, requirements for a loadline certificate, under the Alternate Compliance Safety Agreement (ACSA) program for our vessel the F/P XXXXXXXXX, O.N. XXXXXX

The vessel continues to produce fish products with NMFS product codes determined to be “beyond minimal processing.” We therefore authorize marine inspection representatives of the United States Coast Guard aboard for initial, mid-period, and periodic examinations to ensure continued compliance with exemption letter requirements.

We agree to continually maintain the vessel in compliance with the latest revision of the “Guidance for Implementation of the Alternate Compliance and Safety Agreement Program.”

Signed Owner.