

FISHING VESSEL REGULATIONS ENFORCEMENT PLAN

Skeleton of program laid out at OCC meeting 20 Nov 89. Plan concurred with by the then Chief of Staff (Adm. Beran) 1 Dec 89. Commandant Instruction formalizing this plan, directing action and coordination of M, R, O, and N, assets being developed now. Will set goal of 25% district wide boardings yearly. The plan was discussed this week with respective staff elements. All expressed concern for training and additional tasking. O and N were reminded that we were not talking about additional boardings, only additional requirements to be checked when doing the same number of FV boardings.

PLAN SUMMARY

-Dockside and underway boardings envisioned. Dockside will predominate.

-Program will employ resources of M, O, R and N. District Commanders will need to place special emphasis on the FV safety program to properly channel their resources according to national priorities.

M will use available personnel to conduct both dockside and underway boardings (primarily dockside).

R will make available personnel who already augment MSOs and assist in developing internal training programs.

O will continue to direct underway boardings of fishing vessels (no change in number). Content of boarding will be expanded to address new equipment requirements.

N will assist in developing an Auxiliary Courtesy Marine Exam tailored toward fishing vessels. Aux will conduct Courtesy Dockside Examinations only.

All vessels successfully completing a boarding examination will be issued a year dated sticker to avoid duplication. Sticker will not inhibit OLE type boarding but will insure no duplication of effort by R, N and M.

-18 Fishing Vessel Safety Coordinator Billets approved for FY 91. 15 at districts, 3 at HQ. Their primary function will be to implement the new fishing vessel program and coordinate the enforcement plan for the district commander. 11 of these are military. Not sure whether P-0 will be able to fill. Short bodies. Civilian positions now being classified.

-50 FTEs requested for FY 92. If approved, these positions will be established at MSOs (22 civilian, 28 military) as Fishing Vessel Examiners, primarily for the dockside boarding program.

-We will revise the CG4100. New form (4100F?) will be used strictly for fishing vessel boardings.

-We are presently developing a pamphlet explaining the regulations. This document will be both an educational tool for fishermen and boarding personnel. We plan to send to print just after regs are approved for Federal Register.

-When the regs hit the street we plan to enforce compliance with available resources.

-Termination NVIC drafted. In internal clearance now. Will incorporate in SNPRM. Will seek input from CFIVAC.

-Third party NVIC drafted. In internal clearance now. NAMS, etc., can be authorized to conduct compliance exams and issue an examination ID sticker coincident with other surveys, when the vessel meets regulation standards. Over an extended period of time we expect that claims statistics will favor vessels examined and found in compliance with FV regs and result in premium reductions.

-Exemption policy skeleton drafted. Regs provide for exemptions from equipment and operating requirements. Policy proposes to delegate authority to District Commander. Guidelines for exemptions will be developed and coordinated with CFIVAC and FVSC's.

-We anticipate an initial meeting with OSHA to discuss a new Uninspected Fishing Industry Vessel MOU on 16 April. This is the result of our letter to OSHA requesting an interagency dialogue be established.

ACTIVITIES IN PROCESS NOW.

-Pamphlet/Checklist in drafting. \$50K for 250,000 copies.

-Enforcement Commandant Instruction in drafting.

-Termination NVIC, minor edits. Then to CFIVAC and FVSC for comment.

-Exemption Plan, minor edits. Then to CFIVAC and FVSC for comment.

-Third Party NVIC. Awaiting comment from FVSC. Will send to CFIVAC for comment.

-SNPRM in drafting. Will address Exemptions, Aleutian Trade Act, Termination, Survival Craft requirements for vessels with < 4 individuals operating near the boundary line, Stability Criteria for vessels with loadlines, Voluntary Loadlines, Stability criteria for vessels less than 79 feet.

PROJECTS TO BE DEVELOPED

-CG 4100 revision.

-Role of NMFS observers.

-State Fishery License role in safety awareness.