Alternate Compliance and Safety Agreement (ACSA) meeting minutes
September 21, 2017
North Pacific Fishing Vessel Owners Association (NPFVOA)

Meeting was called to order at 0900 by Dan Hardin (USCG Commercial Fishing Vessel Safety Coordinator for the 13th District, Seattle).

- First order of business was to have everyone introduce themselves.
- Welcome to the ACSA meeting, comments included a brief summary of the program and asked that all attendees feel free to provide input.

Mr. John Dwyer (Coast Guard Sector Puget Sound OCMI) spoke.

- Discussed overview of changes to the ACSA program guidance documents over the years based on recommendations from marine investigations.
- Covered a summary of the development of the ACSA program.
- He asked that industry work on preparing for exams prior to Coast Guard examiners arriving to conduct examinations of the vessels.
    - We prefer not to develop long lists of deficiencies.
- He discussed their efforts to keep the industry informed of issues that might affect the fleet in the future
    - He discussed for example proposed changes to vessel noise in the Puget Sound that affects the health and safety of whales.

Mr. Scott Wilwert (USCG Commercial Fishing Vessel Safety Coordinator for the 17th District Juneau Alaska).

- Mr Wilwert discussed how safety recommendations can affect the ACSA program.
    - He presented several safety recommendations that we might expect to see from the Alaska Juris sinking from the Coast Guard Marine Safety Investigation. The investigation report has not yet been released but these are several topics brought up as a result of some of the investigation.

1. Access to sea chest valves from engine room lower deck plates.

2. Verify masters/mates understand how to use stability information (booklets) on their vessels

3. Closing of watertight doors at sea needs to be enforced by licensed officers.

4. Routine testing of high bilge alarms and documenting the tests (log books/SMS process).

5. Incorporate the setting of watertight boundaries during dewatering drills.

6. Verifying effectiveness and vessel procedures for using the portable dewatering pump to combat flooding in spaces below the

waterline to include engine rooms and auxiliary machinery spaces not readily accessible from the exterior main deck.

All these items in some ways contributed to the vessel sinking. Dan Hardin discussed our website for commercial fishing www.fishsafewest.info and displayed how to navigate the site, what was on the site and specifically the ACSA section of the website. All of the handouts or documents referred to during this meeting can be found at the bottom of the ACSA webpage section of the site.

Mr. Bob Cuddeback (Supervisor of the uninspected vessel branch, Sector Puget Sound) discussed how the Assistant Engineer requirements and how well the industry partners were meeting this requirement either by training up new assistant engineers or complying with the engine room automation requirements. See CG-543 policy letter. Also see Automation checklist.

Discussion from the group on this topic: Mr. Chad See discussed the difficulty in keeping/holding on to those assistant engineers once trained. Representative from OCEAN PEACE discussed how they work to keep their asst. engineers.

Ms. Robyn Kendall (USCG ACSA Examiner Sector Puget Sound) discussed her experience of accruing sea-time for time spent as a worker in the processing space and time spent working as vessel deck crew. Her recommendation was that the industry consider giving appropriate sea time when someone is doing "combi" time.

Mr. Hardin gave a briefing on the GMDSS requirements for vessel operating in Alaska by reading highlights from the guidance provided in the fishsafewest.info website. GMDSS guidance.

LT Luke Woods provided a briefing on the new Ballast Water management requirements that affect the ACSA fleet, both greater than 300GT and 1600GT. You can view his PowerPoint here.

There was a discussion from the group on the topic of looking to get an exemption for vessels operating outside the EEZ, when just transiting, perhaps with an operational restriction of not ballasting or unballasting.

A discussion on the topic of the importance and difficulty of conducting drills for the Coast Guard examination with new crew just reporting on vessels just prior to departing on a new season. Some discussion about doing drills later rather than just after a yard period. The Coast Guard's position is that it is important to do before the vessel departs so that we know the vessel crew has passed the drills. It is good to know that everyone on the crew knows what to do before departure, no matter how difficult it is. Industry agreed that it is difficult but is good to do before departure.

Preparing for annual exams by the Coast Guard. Coast Guard stated that they prefer the vessels prepped before so that the USCG examiners had to return to the vessel 2-3 times. Make sure that whoever is representing the ship is aware of what needs to be done and knows where everything is. Sometimes a Port Engineer represents the ship during the exam and they may not even sail with the ship. Looking to do a visit the first time and only leave a short list of items to correct. Ship must use the ACSA CG-840 Exam Checklist prior to the scheduled exam to self inspect.

Coast Guard wants notification of any major repairs are to taking place. Major repairs such as the watertight envelope and watertight bulkheads, or major machinery. Even if being done for vessels with Loadline with Class society the Coast Guard would like to at least be notified for all ACSA vessel.

Dan Hardin provided a briefing on using electronic charts in lieu of paper charts. Dan went thru the guidance for this issue by referring to fishsafewest.info website. Review this document here.

Flexible pipe couplings. Mr. Cuddeback discussed a concern the ACSA examiners have been working on. Many of the couplings used in the ACSA fleet were not approved. Some deficiencies indentified included not providing a positive means to prevent the couplings from "creeping" on the pipe and uncovering the joint. See 46 CFR 56.30-40. Hearing no objection from the group, our intention is to add this requirement to the ACSA CG-840 Exam Checklist.

Remote closure for sea-valves below the machinery space deck plates. Because of potential flooding in machinery spaces where sea valves are well below deck plates, the Coast Guard is requiring that reach rods or other acceptable means be provided to facilitate closing of sea valves in case of flooding. Requiring crew to entering the space well below the deck plates when flooded or oily water to secure a sea valve must be avoided. If heavy plates are above sea valve, smaller access plates must be installed to provide access to reach rods and must be labeled and those labels must be maintained. Hearing no objection this item will be added to the ACSA CG-840 Exam Checklist.

> A question was asked whether there were type approved remote electrical or hydraulic valves could be used. The Coast Guard will find whether type approved valves are acceptable.

Portable dewatering equipment must be capable of reaching into the bottom of all spaces. Examiners will be checklist to ensure that all intake hoses reach to the bilges. If internal combustion engines must be brought into a confined space to meet this requirement a means of venting the exhaust to outside the space must be provided. In some situations it may be necessary/acceptable to install a standpipe extending to the bilges for connection to the intake of the portable dewatering pump. This information will be added to the ACSA CG-840 Exam Checklist.

Mr. Cuddeback reminded the attendees that the Coast Guard will be checking for compliance with the Drug and alcohol testing requirements for mariners of vessels greater than 200GT, in accordance with 46 CFR Part 16.

The meeting was adjourned at 12:15.