



Marine Safety Center Technical Note

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MARINE SAFETY CENTER TECHNICAL NOTE (MTN) NO. 1-19

Subj: GUIDANCE ON THE CARRIAGE OF GREATER THAN 36 OFFSHORE WORKERS ON OFFSHORE SUPPLY VESSELS OF LESS THAN 6000 GT ITC

Ref: (a) 46 CFR Part 127 Subpart F, *Construction and Arrangements for OSVs Carrying More Than 36 Offshore Workers*
(b) Interim Rule pertaining to Offshore Supply Vessels of at least 6000 GT ITC (Federal Register Volume 79, Number 159, August 18, 2014)

1. Purpose: This Technical Note provides guidance on the process for requesting carriage of more than 36 offshore workers on U.S. flagged Offshore Supply Vessels (OSVs) that are less than 6000 GT ITC.

2. Applicability: These guidelines apply to all requests for the carriage of more than 36 offshore workers aboard OSVs measuring less than 6000 GT ITC.

3. Discussion:

a. Reference (a) allows OSVs of at least 6000 GT ITC to carry more than 36 offshore workers. However, for OSVs of less than 6000 GT ITC, carriage is restricted to 36 offshore workers or less. Since reference (b) came into effect on August 18, 2014, the Marine Safety Center (MSC) has received multiple requests from vessel owners and operators to carry more than 36 offshore workers on OSVs of less than 6000 GT ITC. Although the regulations in reference (a) are applied to OSVs of at least 6000 GT ITC, the Coast Guard has determined that OSVs of less than 6000 GT ITC that meet the requirements of reference (a) provide an equivalent level of safety and will be approved for the carriage of more than 36 offshore workers.

b. In order to address the required minimum standards for novel vessels or configurations, Design Basis Agreements (DBAs) are typically issued until regulations or policy can be created or updated. If vessel owners or managing operators wish to meet a standard other than reference (a) for the carriage of more than 36 offshore workers on OSVs of less than 6000 GT ITC, they may request a DBA from the MSC that outlines the standards that the vessel must meet in order to provide an equivalent level of safety to the requirements in reference (a).

4. Action:

a. Vessel owners or managing operators requesting to carry more than 36 offshore workers on OSVs of less than 6000 GT ITC must first coordinate with the Officer in Charge, Marine Inspection (OCMI) for the location in which the vessel is under construction, alteration, or repair, and provide them with an Application for Inspection (CG-3752 or CG-3752A). The OCMI and vessel

owner/managing operator are encouraged to use these guidelines to facilitate discussions and to document which specific plans will be required for submission to the Coast Guard.

b. Vessel owners or managing operators proposing to meet a standard other than reference (a) may request a DBA from the MSC. With this request, submitters must provide a proposed regulatory framework highlighting the standards or regulations that will be met, and which capture all aspects of the design. Justification should be provided as to why the proposed arrangement provides an equivalent level of safety to the requirements in reference (a) for the carriage of additional offshore workers. Once the request is reviewed, the MSC will issue a DBA to the submitter formally documenting that the proposed regulatory framework will be applied as an alternative to the regulatory restriction of no more than 36 offshore workers.

c. For OSVs of less than 6000 GT ITC that either meet the requirements of reference (a) or an approved DBA, vessel owners or managing operators should submit a formal request to the MSC to carry more than 36 offshore workers. With this request, submitters must provide supporting plans, drawings, calculations, or other documents to show that the vessel meets the requirements in reference (a) and/or the approved DBA.

d. For OSVs enrolled in the Alternate Compliance Program (ACP), all requests must be submitted to the MSC by the vessel's classification society.

e. Vessel owners or managing operators must submit a request to the MSC for each vessel that will carry more than 36 offshore workers. Approval for the carriage of more than 36 offshore workers cannot be issued to more than one vessel at a time, or extended from one vessel to another. Additionally, if the vessel owner or managing operator wishes to change the conditions of the approval (e.g. increase the number of allowed offshore workers), a new approval and/or DBA must be issued to reflect the desired changes.

5. Disclaimer: While the guidance contained in this document may assist the industry, the public, the Coast Guard, and other Federal and State agencies in applying statutory and regulatory requirements, this guidance is not a substitute for the applicable legal requirements, nor is it in itself a regulation. It is not intended to, nor does it impose legally binding requirements on any party, including the Coast Guard, other Federal agencies, the States, or the regulated community.



S. J. KELLY

Copy: Commandant, U. S. Coast Guard (CG-ENG, CG-CVC, CG-OES)
Commander, Eighth Coast Guard District
Commander, Sector New Orleans, Prevention Department
Commanding Officer, Marine Safety Unit Houma
Commanding Officer, Marine Safety Unit Morgan City
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