

**Commercial Fishing Safety Advisory Committee (CFSAC)
2011-2014 Tasks and Recommendations – Pending Items**

Ref Number	Subject	Tasks/Recommendations	Status
11-D	Training <i>As required in the 2010 CG Authorization Act.</i>	(1) That the content of the required topics on the list be designed and available to take in modules. i. Stability and damage control. ii. Seaman ship, collision prevention & navigation including publications, weather, communications. iii. Firefighting and prevention. iv. Emergency medical care. v. Emergency drills and personal survival.	Ongoing with sub-committee. To be addressed further at future meetings.
11-E	Training	(2) That the” individual in charge” of the vessel is the person serving as the Master of the vessel.	Under rulemaking consideration.
11-F	Training	(3) That the Coast Guard approve/accept courses that meet the requirements developed and retain general oversight of such courses.	Curriculum standards and/or requirements TBD.
11-H	Training	(5) That the training be as accessible and as locally-deliverable as possible.	Pends - TBD
11-I	Training	(6) That the required courses be performance based and emphasize hands on skills assessments.	Pends - TBD
11-N	Legislative Affairs	(5) That the Coast Guard write the National Association of State Boating Law Administrators (NASBLA) requesting feedback on state rules that may affect fishing vessel safety.	Pends Referred to BSX.
11-O	Communications	(1) That the Coast Guard work with the National Marine Fisheries Service or other government agencies such as National Association of State Boating Law Administrators (NASBLA) to send out important and needed information to fishermen.	Pends. Methods under consideration.
11-T	Communications	(6) That the Coast Guard explore the use of NOAA broadcasts as an outreach tool for messages such as regulation change alerts and safety messages and direct listeners to their website for further info.	<i>Have been working with NOAA on outreach efforts and means for same.</i>
11-W	Vessel self-examination	Although “The Inspection Plan/Report to Congress of 1992” has been in ways supplanted/superseded by the Auth Act, CFSAC should continue to look at self-exam requirements for vessels operating within 3 NM and with fewer than 16 POB.	Ongoing. To be addressed at next meetings.
11-X	Vessel self-examination	That the CG develop a self-examination program for vessels operating inside 3 NM and with fewer than 16 POB, and an interim self-examination program for vessels that have received a COC.	Under evaluation.
11-Z	Record keeping	That the Coast Guard define “equipment,” in 46 USC 4502 (f)(1), to include, at a minimum, a vessel’s required portable lifesaving gear, the required safety systems, and the watertight envelope for recording of maintenance.	Under review for rulemaking project.

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11-2-D	Update 1992 Inspection Report to Congress	That the U.S. Coast Guard update the data in the 1992 Inspections Report to Congress, to include data from NIOSH's studies.	Pends
11-2-E	Documentation of safety assessments	That the master of a fishing vessel operating beyond 3 NM be required to document and notify owner of monthly self safety assessments of all emergency equipment (Part 28), watertight envelope, and bilge alarm and pumping system.	For the most part, required by the CGAA. To be addressed in rulemaking project.
11-2-G	Training requirements from CGAA - Firefighting	That if a fisherman is in possession of a current 200 ton or above mariner license, this will satisfy the fire fighting training requirement.	TBD
11-2-H	Training requirements from CGAA – Medical Care	That minimum competencies for required medical training be American Red Cross/American Heart Association or other USCG-accepted or approved basic CPR/First Aid with a 5 year re-currency.	TBD
11-2-I	Training requirements from CGAA – Stability	That a USCG-approved course for damage control and stability be recognized to meet this training. Also that a 200 ton or higher license meets the requirement for stability training.	TBD
11-2-J	Training requirements from CGAA – Survival Equipment, Procedures, and Onboard Drills	That if a fisherman has taken a USCG-accepted Personal Survival Techniques Course plus a USCG-accepted Drill Conductor course, this will satisfy the Survival Equipment, Procedures and Onboard Drills training requirement.	TBD
11-2-K	Training requirements from CGAA - Weather	That the 100 ton or higher license be accepted in lieu of the Weather training requirement.	TBD
11-2-L	Trng Req from CGAA - Seamanship and Navigation	That 180 days of sea time with navigation duties on a commercial vessel without a marine incident is equivalent for Seamanship & Navigation.	Not passed. N/A, however, experience may be considered
11-2-M	Training requirements from CGAA – Collision Avoidance	That if a fisherman has a current operator UPV or above mariner license, this will satisfy the Collision Avoidance training requirement.	TBD
11-2-N	Training Requirements Completion	That the USCG allow commercial fishing vessel operators 5 years after publication of a standard curriculum to complete all training modules.	TBD
13-B	Training	That the training requirements referenced in the 2010 Auth Act, be treated as ACCEPTED training and be: <ul style="list-style-type: none"> a. ACCESSIBLE to remote homeports and fishermen; b. AFFORDABLE to reduce cost barriers to compliance; c. RELEVANT to fishing culture and terminology; and d. Student Centered with teaching methodologies that are HANDS-ON, interactive performance-based, and with skills-based assessments vs exams. 	Pends - TBD.
13-C	Training	That there be no license substitute or STCW BST certificate to meet the equivalency for the Drill Conductor course.	Agree – TBD.
13-D	Training	That a 500-ton Mate license or higher obtained within 5 yrs as equivalency for Damage Control and Stability training.	Pends – TBD.
13-E	Training	That basic firefighter or 500-ton Mate license or higher obtained within 5 yrs as equivalency for Firefighting trng.	Pends – TBD.
13-F	Training	That for the topics of seamanship, collision prevention, watchkeeping, navigation, fatigue & weather, a 500-ton Mate license or higher be equivalent for a certificate.	Pends – TBD.

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13-G	New Vessel Construction	That in addition to the standards set forth in 33CFR 183, the Coast Guard should review and adopt applicable standards for construction of vessels under 50 feet in length such as from ABYC and the ABS yacht code.	Pends – TBD.
13-H	New Vessel Construction	That the construction standards for vessels under 50 feet in length provide: <ul style="list-style-type: none"> a. A minimum standard for the construction and maintenance of a watertight envelope for the vessel; b. Minimum reserve buoyancy for decked vessels; and c. Minimal standards for internal floatation for open boats. 	Pends - TBD
13-I	New Vessel Construction	That, prior to deployment in any fishery, builders or owners of newly constructed vessels under 50 feet in length should document to the Coast Guard that the vessel was constructed per the required standards. The Coast Guard should determine compliance, or authorize third-party examiners or marine surveyors to do so.	Pends - TBD
13-J	Stability	That the Coast Guard establish simplified stability criteria for vessels under 50' in length.	Pends - TBD
13-K	High Water Alarms	That the Coast Guard amend 46 CFR 28.250 by removing the phrase "On a vessel 36 feet (11.8 meters) or more in length" limitation for applicability.	Pends - TBD
13-L	New Vessel Construction	That vessels under 50 feet in length, built or under construction prior to the implementation of construction standards, should be subject to the standards where practicable, as follows: <ul style="list-style-type: none"> a. Not required (vessel is grandfathered); b. Phased in over a specific time period; c. Required after a major conversion; or d. Required immediately 	Pends - TBD
13-M	Training	That the Coast Guard establish the training requirements in the 2010 Auth Act; consist of 4 stand alone modules: <ul style="list-style-type: none"> a. Medical -1 day; b. Survival, Firefighting & Drills -2 days; c. Stability & Damage Control -1 day; d. Seamanship, collision, navigation, weather, fatigue, watchkeeping -1 day; And, that a curriculum be developed with lessons plans similar in format to the 1995 Survival & Drills course.	Pends – TBD Fatigue training not required by the law, but could be included with collision avoidance and navigation.
13-N	Training	That sea time not be an equivalency for any of the training requirements in the 2010 Auth Act.	Recommended to be deleted by 14-B.
13-O	Training	That the training requirements in the 2010 Auth Act be based on, at a minimum, objectives developed by the Committee on: Weather ,Seamanship, Fatigue, Collision Avoidance, Stability, Damage Control, and Watchkeeping.	Pends – TBD Fatigue training not required by the law, but could be included.
13-P	Training	That any public or private entity with appropriate training resources and qualified instructors be reviewed by the Coast Guard for approval to conduct the training. Qualified instructors should have a commercial fishing background and have completed the Fishing Vessel Safety Instructor training per 46 CFR 28.270 (c), and specific expertise in topic they are teaching.	Agree - TBD

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13-Q	Training	That case studies be included in each of the training modules, excluding the medical module, where students can identify causal factors related to a casualty.	Agree - TBD
13-R	Training	That refresher training be required every 5 years for the required competency training in the 2010 Auth Act, except for the Medical Module where CPR and First Aid renewal frequency would follow requirements of the issuing organization. Refresher training should consist of a basic 16 hour course.	Pends – TBD
13-S	Alternate Safety Compliance Programs	That the Coast Guard develop Alternate Safety Compliance Programs for specific regions and fisheries in conjunction with regional ASCP working groups.	Ongoing – Criteria to be presented for comment.
13-T	Alternate Safety Compliance Programs	That Alternate Safety Compliance Programs stipulate that vessels participating in multiple fisheries adhere to the highest standards of ASCP's for those fisheries.	Ongoing – Criteria to be presented for comment.
13-U	Alternate Safety Compliance Programs	That the Coast Guard work with industry groups to develop a risk-based criteria menu for fisheries or regions for specific Alternate Safety Compliance Program requirements; using a matrix to identify applicable compliance items.	Ongoing – Criteria to be presented for comment.
13-V	Alternate Safety Compliance Programs	That the Coast Guard begin outreach to educate fishermen on ASCP requirements being developed during dockside exams, Regional Fisheries Management Council meetings, and other venues.	Ongoing – Criteria to be presented for comment.
13-W	Vessel Examination	That the Coast Guard continue the policy of CFV exams every two years.	Letter to industry issued Aug 2015.
13-X	Survey and Classification	<p>That the Coast Guard inform the House Subcommittee on CG&MT and Senate Subcommittee on OAF&CG that the CFSAC did not and does not support survey and classification requirements for new vessels greater than 50 feet per the following:</p> <ol style="list-style-type: none"> a. We participate in our advisory role because we believe in the value of industry and public comment when determining regulation. Industry is more accepting of regulations when the process is participatory. There was no public or industry input sought on classing of fishing vessels. b. The report to Congress on inspection of fishing vessels introduced class and load line construction standards, but did not suggest that maintaining class certification. The report suggested annual inspection by third parties with audits and reviews by the CG. c. CFSAC believes in programs where fishing vessels greater than 50 feet comply with hull and machinery standards and fishery or geographic specific standards based on operational risks. d. CFSAC recommends that Congress amend Section 4503 to require new vessels to adhere to class and load line design construction standards, but not require class certification. Construction standards along with mandatory compliance programs will offer adequate safety without the burden of full class certification expense on the fleet. 	Partially conveyed during Staff briefs. Staff subsequently received copy of recommendation.

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Ref Number	Subject	Tasks/Recommendations	Status
13-Y	Training	That the Coast Guard accept the training objectives as amended for the four training modules (see number 13-M) covering the topics required by the 2010 Auth Act.	Pends - TBD.
13-AA	Alternate Safety Compliance Programs	That the Coast Guard consider the following as minimum standards for Alternative Safety Compliance Programs, as appropriate for vessels that will be subject to ASCPs: <ul style="list-style-type: none"> a. Stability Standards: <ul style="list-style-type: none"> i. A "simplified" stability standard for vessels < 79'. ii. Stability calculated by architect for vessels > 79'. b. Haul-out: not to exceed every three (3) years c. Watertight Integrity: <ul style="list-style-type: none"> i. Watertight/weathertight closures: <ul style="list-style-type: none"> 1) Closures clearly labeled "Open for transit only - keep closed at sea" 2) All dogs/closure devices are operable 3) Closures tested for fit and watertight integrity 4) Seal not painted, badly cracked or deteriorated ii. Below deck watertight doors, hatches, bulkheads <ul style="list-style-type: none"> 5) Original internal watertight subdivision maintained or restored 6) No bulkhead penetrations. 7) Watertight doors are operable; seals intact d. Machinery systems: <ul style="list-style-type: none"> i. Fuel piping on pressure side is seamless steel, annealed copper, or brass tubing or nickel copper meeting SAE standards. Non-metallic hose under 10 psi is allowed only where flexibility is required to prevent damage from vibration. e. Life Saving Equipment and Arrangements <ul style="list-style-type: none"> i. Immersion suits maintained to manufactures specs. ii. Immersion suits fitted with a Coast Guard-approved strobe type PML. f. There must be a closure on the machinery space hatch. g. Freon detector on vessels with Freon refrigeration. 	Ongoing as ASCPs are being developed. Final draft guidelines will be provided for public comment.
14-A	Training	That the Crew Endurance (Fatigue) objectives be placed under the WatchKeeping competency per 13-M &O.	Pends – TBD. Fatigue not required, but could be included.
14-B	Training	That recommendation 13-N be rescinded.	Pends, but concur.
14-C	Training	That recommendation 13-P be revised to read at the end "...and/or specific expertise in the topic they are teaching."	Pends, but concur.
14-D	Alternate Safety Compliance Programs	That the Coast Guard formally request NIOSH to assist in data analysis for development of ASCPs.	Ongoing
14-E	NIOSH Support	That the Coast Guard provide letters of support to NIOSH on research proposal.	Completed when requested.
14-F	NIOSH Support	That the Coast Guard assist NIOSH efforts by hiring interns or assigning temporary details to collect information from MISLE on casualty data needed for ASCP development.	Will consider where possible and funding allows.
14-G	Alternate Safety Compliance Programs	That the CFSAC supports the ASCPs and concepts for vessels at least 50 feet in length. Due to regional and fleet specific natures, program development, approval, and administration should be delegated to Districts.	May be considered after ASCP framework finalized and feedback from industry.

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14-H	Alternate Safety Compliance Programs	That the CFSAC approves of changes to the draft ASCP matrix and the draft of a policy letter on ASCP guidelines.	Matrix and policy letter are being reviewed for public availability and comment.
14-I	Training	That the updates and modifications to the Training Objectives for operator competencies be accepted as presented to the Committee.	Pends-TBD. Overall curricula development is required.
14-J	Training	That updates in survival equipment products and practices be added as an item in refresher training for operator competencies.	Pends development of a standard curriculum.
14-K	Training	That a risk analysis exercise (eg GAR Model) be added to the objectives for the Drill/Survival/Fire module.	Pends-TBD.
14-L	Training	That a Skills Performance Checklist be included with the competency training modules.	Pends-TBD
14-M	Survey and Classification	<p>That the USCG inform the House Subcommittee on Coast Guard & Maritime Transportation and the Senate Oceans, Atmosphere, Fisheries and Coast Guard Subcommittee that the Commercial Fishing Safety Advisory Committee (CFSAC) did not and does not support classification requirements for new vessels at least 50 feet in length built after July 1, 2013.</p> <p>We participate in our advisory role because we believe in the value of industry and public comment when determining how our industry is regulated. The industry is more accepting of regulations impacting safety when the process is participatory. There was no public comment or industry input sought concerning the classification of fishing vessels.</p> <p>The CFSAC believes strongly that to solve safety concerns within the commercial fishing industry that we should start with the casualty data and consider both the economic concerns of the fishing industry and the staffing concerns of the United States Coast Guard. Requiring new fishing vessels to be classed is not based on the casualty data and does not take in account the economic concerns of the fishing industry.</p> <p>The Report to Congress for the Inspection of Commercial Fishing Industry Vessels did introduce classification and load line standards as design and construction standards but did not suggest requiring regulation to obtain classification certification. The report suggested vessels would be inspected annually by third parties with audits and reviews conducted by the Coast Guard.</p> <p>This committee believes in compliance programs where all fishing vessels greater than 50' must comply with hull and machinery standards as well as fishery specific or geographic specific standards because of specific risks associated with a fishery, a gear type or an area of operation.</p>	The subcommittees received a copy of recommendation.

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<p>14-M cont.</p>		<p>This committee recommends a study be undertaken to:</p> <ul style="list-style-type: none"> ○ Examine the casualty data to determine if our casualty statistics can be improved and to what extent with the classification of fishing vessels; ○ Examine the costs to industry associated with the classification of new fishing vessels; and ○ Examine the possible consequence to the fishing industry by delaying the building of new vessels because of the classification requirements and the casualties that may be a direct result of our fishing vessels not being retired as they might without classification regulations. <p>This committee recommends that Congress move to amend Title 46, Subtitle II, Part B, Chapter 45, Section 4503 to require vessels built after July 1, 2013 adhere to classification and load line design construction standards but not require classification certification.</p> <p>We believe that this along with mandatory compliance programs will offer adequate safety standards without burdening our commercial fishing fleets with the unnecessary expense of full classification certification. Your attention to this matter is greatly appreciated.</p> <p>The Commercial Fishing Safety Advisory Committee is ready to serve the advisory needs of the United States Coast Guard, please do not hesitate to call on us as needed.</p>	
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NOTES: Column 1 - Year recommended. Column 4 – Status/progress of the recommendation.