

CG-ENG Policy Letter 01-24: Guidance Regarding Devices that Alter Maneuvering Characteristics of Ships to Ensure Safe Operation in Waters of the United States

Frequently Asked Questions

Composed by the USCG Office of Design and Engineering Standards (CG-ENG)
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Installation of an EPL/SHaPoLi only limited my top speed by a very small amount, do I still need to update my pilot card?

Yes, any change to the maximum achievable top speed is considered to be a change in the ship's maneuvering characteristics and maneuvering information must be updated (33 CFR 164.35(g)).

If the EPL/SHaPoLi is overridden prior to entry into U.S. territorial waters each time the vessel calls on a U.S. port, is this considered compliance?

No, the maneuvering information must accurately reflect the true and current power configuration of any vessel at all times, both in U.S. territorial waters and elsewhere (Res.A.601(15) , 33 CFR 164.35(g)). So if a vessel has multiple power configurations, each must be reflected in a clear way on the documents, or additional documents for each condition produced.

This is not a U.S.-specific regulation; paragraph 2.3 of IMO Res.A.601(15) requires the maneuvering information to be amended following and modification to a ship that could change the maneuvering characteristics.

The EPL/SHaPoLi installed on my vessel is the type that gives an alarm when the set point is exceeded but there is no delay in accessing the reserve power (also called a "stand alone solution"). What actions am I required to take?

No action is required. Systems of this type do not alter the maneuvering characteristics of ships and thus the guidance in Policy Letter 01-24 does not apply.

What is the Coast Guard expectation for updating pilot cards and maneuvering posters? Are sea trials required or will CFD methods suffice?

The USCG won't detail exactly how the new or updated pilot cards and maneuvering posters are created, they're simply held to the same standard as they always have been according to IMO Res.A.601(15) and 33 CFR 164.35(g).