



U.S. Coast Guard Sector Honolulu



Work Instruction 31

Reduced Manning Criteria for Dive and Snorkel Operations on Inspected Small Passenger Vessels

1. **References:**

- a. United States Code (USC), Title 46, Part 8101
- b. United States Code (USC), Title 46, Part 8902
- c. Code of Federal Regulations (CFR), Title 46
- d. Marine Safety Manual (MSM) COMDINST M16000.8B Vol. III
- e. Sector Honolulu Work Instruction 2 “Standardized COI Endorsements”

2. **Objectives:** The purpose of this work instruction is to outline reduced manning and equivalent level of safety criteria afforded to diving and snorkeling excursion vessels to permit the use of required deckhands for in water activities while moored or anchored. This reduction would allow deckhands to enter the water and provide to passengers in-water services tied to diving or snorkeling activities, such as a dive master, in-water guides, lifeguards, etc. The decision to endorse a Certificate of Inspection (COI) to permit reduced manning will be at the discretion of the Officer in Charge, Marine Inspection (OCMI), and will be based on the vessel’s ability to prove an equivalent level of safety as outlined in this instruction.

3. **Applicability:** Certificated small passenger vessels operating in Sector Honolulu’s inspection zone that offer in-water activities, such as recreational diving and snorkeling, to their passengers.

4. **Background:** The Coast Guard is congressionally mandated to determine and apply appropriate manning levels on all commercial passenger vessels. In doing so, it is imperative to consider the vessel’s design, service, and intended operations. Historically, deckhands on small passenger vessels conducting dive/snorkel operations in Hawaii were allowed to leave the vessel and enter the water by way of a COI endorsement thus reducing the manning level onboard. Receiving this endorsement was contingent upon meeting additional safety measures (equivalent level of safety) to compensate for the manning reduction. After analyzing marine casualties over the past, reduced manning was shown to be a contributing factor in a number of marine casualties.

To enhance marine safety, Sector Honolulu revisited this instruction and determined that the complexity of vessel operations, even while at anchor or moored, required a more detailed approach to determine equivalent levels of safety. The decision to allow reduced manning based on equivalent levels of safety remains at the OCMI’s discretion. Therefore, Sector Honolulu revised the minimum criteria that must be met to be eligible for reduced manning.

5. **Action:** Each vessel that currently has a reduced manning endorsement connected to in-water activities and all new requests shall prove, to the satisfaction of an attending Marine Inspector,

X *Eric J. Velby*
 Chief, Inspections Division

that it meets or exceeds the provisions outlined in this instruction. Operators with existing manning reduction endorsements shall prove compliance with this amended instruction no later than their next inspection. Failure to meet or exceed this instruction will result in removal of the endorsement, and manning levels will be maintained by operators per their COI.

The endorsement reads,

“IF THE PROVISIONS OF WORK INSTRUCTION 31 ARE MET, THE REQUIRED DECKHAND(S) MAY ENTER THE WATER WHILE MOORED OR AT ANCHOR DURING IN-WATER PASSENGER ACTIVITIES.”

Eligibility: In order to receive this endorsement, the following minimum equivalent level of safety measures shall be reviewed and approved by an attending Coast Guard Marine Inspector:

- 1) Mooring arrangement: Only vessels moored or anchored while engaged in diving and or snorkeling operations may utilize the reduced manning endorsement. Vessel engaged in drift excursions or combinations of anchoring and drifting must maintain a full manning complement per the vessel COI. If during the course of the excursion the vessel gets underway (including drifting), the vessel must again be manned in accordance with its COI.
- 2) Environmental Considerations: The vessel shall have well defined, written policy outlining environmental considerations for the use of reduced manning. This policy shall address weather conditions including, pre-departure weather assessments, wind, tide, and sea assessments for excursion locations, continuous weather monitoring throughout the excursion, change in diving and snorkel environmental conditions including current, wind, and waves. These considerations should clearly define when reduced manning is allowed and when the vessel should maintain its required manning per the COI. In addition, while in a reduced manning status, each vessel must have the ability to continuously monitor marine band weather through the use of VHF 16 and NOAA weather channels utilizing a radio with scanning capabilities.
- 3) Watch Keeping: The master shall have an unrestricted (360 degrees) view of the excursion operating area from the bridge or the location in which they are continuously monitor marine band weather. This requirement affords the master the ability to identify emergencies, environmental changes and incoming threats to passenger and the vessel without obstructions. The use of a handheld VHF radio to establish a suitable viewing location is not considered an acceptable alternative based on the limited range (line of sight) of handheld radios.
- 4) Vessel Configuration: The master must be able to single-handedly get an unresponsive passenger or injured passenger back onboard. Based on the vessel's design, freeboard, configuration, etc., a swim platform or a rescue appliance, such as a sling, crane or winch, may be necessary in order for the master to recover an unresponsive, injured, or distressed diver/snorkeler. The ability to retrieve passengers does not supersede drainage, stability, or other requirements.

- 5) **Rendering of First Aid:** The master must be able to render first aid to an unresponsive person while awaiting assistance from others in water persons. Navigation and Inspection Circular 1-91 recommends that at least 50% of the crew is cardiopulmonary resuscitation and first aid qualified. While in a reduced manning status this means that the qualified crewmember may be in water leaving that injured party without a trained rescuer. To remove that possibility the master or other qualified deckhand must be onboard at all times even when in a reduced manning status. To further emphasize the importance of first aid, every vessel operating with reduced manning with only the master onboard (no crew) shall be outfitted with additional medical equipment to include automated external defibrillator (**AED**) and portable oxygen. This additional equipment allows the master to provide first aid and perform additional duties such as the recall of in water persons and maneuver the vessel while medical care is being administered by an AED or portable oxygen.
- 6) **Vessel Maneuverability:** The master must be able to demonstrate the ability to single handedly and quickly free the vessel from its mooring and or anchorage and get the vessel underway without entering the water. The same requirement would apply to a vessel operating with a master and reduced crew.
- 7) **Policies and Procedures:** The required written policies and emergency response procedures specific to this instruction must be presented to the attending marine inspector at its annual inspection. Failure to maintain compliance to this instruction will result in the reduced manning endorsement on the vessel COI becoming invalid. Additionally, each crewmember must have training in the vessel operating policies and procedures and demonstrate a clear understanding of them. Enclosure (1) provides the minimum information that shall be included in writing per this instruction. Failure to address each area will result in a removal of the reduced manning endorsement from the COI.

6. **Duties:**

Coast Guard Marine Inspector Duties:

- 1) At each inspection for certification and each annual re-inspection, marine inspectors shall review the companies written policy and procedures as it relates to the reduced manning endorsement and verify that the vessel continues to meet the criteria outlined in this instruction.
- 2) If the vessel fails to meet the minimum requirements, the endorsement shall immediately be removed from the COI and the required manning per the COI shall be re-established.
- 3) Marine Inspectors shall place an inspection note in MISLE detailing the cause of the non-compliance.

Vessel Master Duties:

1. The master shall ensure all crewmembers are familiar and trained in the written policies and procedures as it relates to the reduced manning. In addition, it remains the sole responsibility of the master to ensure these policy and procedures are implemented and followed. The decision to implement reduced manning remains at the master's discretion and they should exercise sound judgment when considering this action.

Coast Guard Investigating Officer Duties:

- 1) Investigator will continue to evaluate each reportable marine casualty connected to vessels with a reduced manning endorsement. Investigator shall determine if reduced manning including the companies policies and procedure may have contributed to a casualty.
- 2) Upon completion of a marine casualty investigation Coast Guard Investigators shall determine if misconduct, violations of law or negligence played a role in the casualty. Marine Investigators shall take appropriate suspension, revocation, and/or civil actions against the owners, operator, and crewmembers as necessary to achieve the appropriate remedy based on the casualty investigation results.
- 3) Investigators shall forward all reduced manning casual factors to the Chief of Inspections to afford continuous review and amendments to this work instruction.

Should you have any questions regarding this Work Instruction, please contact Sector Honolulu Inspections at Hono.Inspections@uscg.mil.

#

Encl: (1) Straw man written policy requirements

Enclosure 1

Straw man written policy requirements

The intent of this enclosure is to provide an outline of specific information that is required to be included in company/vessel written plans, policies and procedures to obtain a reduced manning endorsement. Adhering to this general outline will allow Marine Inspectors to quickly evaluate whether your program complies with this instruction.

1. General vessel operation description:
 - a. Brief description of the vessels route, service and locations while operating in a reduced manning.

2. Weather operating limitations:
 - a. Specific information on weather limitations when reduced manning is allowed and when it is not. This should be based on vessel design, ability to recover victims, visibility, etc. The intent is to realistically identify when reduced manning may be unsafe.

3. Crew responsibilities and roles:
 - a. Define roles and responsibilities of vessel crew when moored/anchored specific to reduced manning. This can be simple or complex based on the type of reduced manning and how many crewmembers are onboard and/or in-water. Determine when/if additional lookouts, in-water lifeguards/guides, and/or divemasters will be used based on the number of passengers.

4. Maintenance and use of snorkeling/dive equipment in accordance with manufactures specifications:
 - a. Define inspection schedule, methods for maintaining in-water excursion equipment.

5. Assessment of Passengers:
 - a. Define how the crewmembers will determine “at risk” passengers beyond the use of a medical/health questionnaire.
 - b. Define training for crewmembers to determine possible “at risk” passengers.
 - c. Define how these passengers will be monitored as it relates to in-water activities.
 - d. Identify alternative activities for persons that are “at risk”. Examples could include low impact in-water activities, additional personal safety equipment, heavy oversight, vessel activities only.

6. Briefing of Passengers
 - a. Physical demands
 - b. Possible in-water hazards
 - c. Areas to stay within or avoid
 - d. Use of equipment
 - e. Entry/egress procedures
 - f. Use of buddy system

- g. Emergency/distress communication signals
 - h. Recall and recovery of passengers
7. Management of in-water passengers at snorkeling/dive site.
- a. Define how passengers are monitored and identified as being assigned to the vessel.
 - b. Define a reasonable ratio of in-water deckhands to in-water passengers.
8. Emergency Response Procedures
- a. Assignment of crews
 - b. In-water rescue techniques
 - c. Extraction of victim from the water techniques
 - d. Administering first aid
 - e. Crowd control
 - f. Passenger recall procedures distinct to the vessel.
 - g. Coordination with land-based emergency response agencies
 - h. Pre-identification of possible delivery harbors of injured persons.
9. Crew Training and Drills
- a. Monitoring of passengers.
 - b. Use of onboard medical equipment
 - c. Quarterly training and drills based on identification, rescue and recovery of a distressed snorkeler/diver. To be logged accordingly.
 - d. Identification of possible “at risk” passengers.
10. Post Casualty Procedures
- a. Criteria for alcohol/chemical testing of persons directly involved.
 - b. Debriefing of crew
 - c. Updating policies/procedures based on lessons learned
 - d. 46 CFR Subpart 4.05 marine casualty reporting requirements.