

November 4, 2003

To: Harbor Safety Committee  
From: Joan Lundstrom, Chair, Tug Escort Work Group  
Subject: Tug Escort Checklist Completion

Tug Escort Regulations require that the pilot on a loaded tanker is responsible for the vessel master having a completed tug escort Checklist. If the master has not prepared the Checklist at sea when the vessel reaches the pilot station, the transit can be delayed and as a major distraction potentially be a safety problem when entering the shipping lanes in the Bay.

While the Regulations specify that “The vessel owner/operator shall assure that the vessel master complete the Checklist according to the requirement in the subchapter” (851.1(b)(2)a), the requirement is applicable when the vessel enters Zone 1, which is at the Golden Gate Bridge, not the pilot station at sea. After extensive discussion, the Work Group recommends that the issue be addressed primarily by alerting ship agents, representing vessel owners, to plan ahead for tug escorts i.e. completing the Checklist, and by OSPR following up when the Checklist is initially incomplete. This would be accomplished by OSPR, the Clearing House (Marine Exchange), Pilots, VTS and NOAA as outlined below. A number of these procedures are already underway.

The Work Group does recommend deleting the mandatory requirement that pilots must have checklists available when boarding. However, pilots will continue to provide the Checklist, but will not have the implied liability. And the Work Group recommends, upon mutual agreement between OSPR and the Clearing House, deleting a requirement that a list of training programs be maintained by the Clearing House.

**Recommendation to Change Tug Escort Regulation:**

“Tug Escort Plans” Delete 851.6(a)(7): “Pilots shall have blank Checklists available when boarding the tank vessel”.

“Clearing House Responsibilities” Delete 851.6(10): “maintain the list of training programs approved by the Administrator and provide a copy of that list upon request to any interested party;”

**Recommendation to Change Procedures:**

1. The Marine Exchange will send a reminder letter to ship agents, along with a revised Checklist which incorporates the warning that failure to comply with completing the Checklist is a violation (see revised San Francisco Bay Area Tug Escort Plan).
2. VTS agreed to add for one year to the Local Notice to Mariners of the Checklist requirement for loaded tankers, and also to the VTS Users Manual.
3. NOAA: The Coast Pilot, which publishes tug escort regulation, should be checked for updated information.

4. Beginning October 1, the Marine Exchange Dispatch will also advise every agent of the Checklist before a transit.
5. The Pilot Dispatch will ask every agent when a Pilot Order Form is given a day prior to a transit.
6. The Harbor Safety Committee should encourage terminal operators to remind ships to comply.
7. OSPR should follow up with the ship agent and owner when the Clearinghouse reports to OSPR that the Checklist was incomplete when the pilot boarded the ship at sea. Also OSPR should develop a generic letter to ship agents reminding them of the responsibility of complying with tug escort responsibilities through completing the Checklist in advance of arrival at sea.