



Coast Guard Sector Houston-Galveston Marine Safety Information Bulletin 15-24

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Guidance Regarding Devices Altering Maneuvering Characteristics in the Sector Houston-Galveston Area of Responsibility (AOR)

This Marine Safety Information Bulletin (MSIB) supplements recent Coast Guard Commandant (CG-ENG) policy guidance to maritime stakeholders regarding devices that alter the maneuvering characteristics of ships operating in the territorial waters of the United States within the Sector Houston-Galveston AOR.

Since November of 2022, existing ships have been required to comply with the Energy Efficiency Existing Ship Index (EEXI) regulations found in MARPOL Annex VI. One compliance option has been to reduce maximum ship speed or power through installation of overridable Engine Power Limiter (EPL) or Shaft Power Limiter (SHaPoLi) systems, of which there are two general types: electronic or mechanical. And while installation of EPL/SHaPoLi systems appears to be a viable and cost-effective way to achieve compliance, concerns regarding potentially hazardous scenarios involving underpowered ships have been communicated to the Coast Guard.

Vessel owner/operators are reminded that before embarking a pilot when entering or getting underway in the navigable waters of the Sector Houston-Galveston AOR, main propulsion machinery should be available to timely respond to the full range of maneuvering commands. Ships transiting the AOR with EPL/SHaPoLi systems engaged must therefore be prepared to rapidly disengage the system if a safety concern or hazard arises. If, however, there might be concerns with the ability to override the system in a timely manner, preemptive override should be considered prior to beginning restricted waters transit.

SOLAS, Chapter V, Regulation 34 requires *safety-focused* voyage planning that considers the ship's maneuverability characteristics, navigation hazards, and environmental conditions along a route, including but not limited to number, severity, and frequency of course and speed changes, information from the Master-Pilot exchange, engine-order response times, duration, and complexity of transit in restricted waters, density of marine traffic, limits to visibility, tug availability, etc... As noted above, ship owner/operators entering the Sector Houston-Galveston AOR are empowered by me to exercise pre-emptive override of any power limiting systems should their safety-focused voyage planning reveal the potential need for reserve power (ex. weather, currents, traffic, route, power availability concerns, etc...).

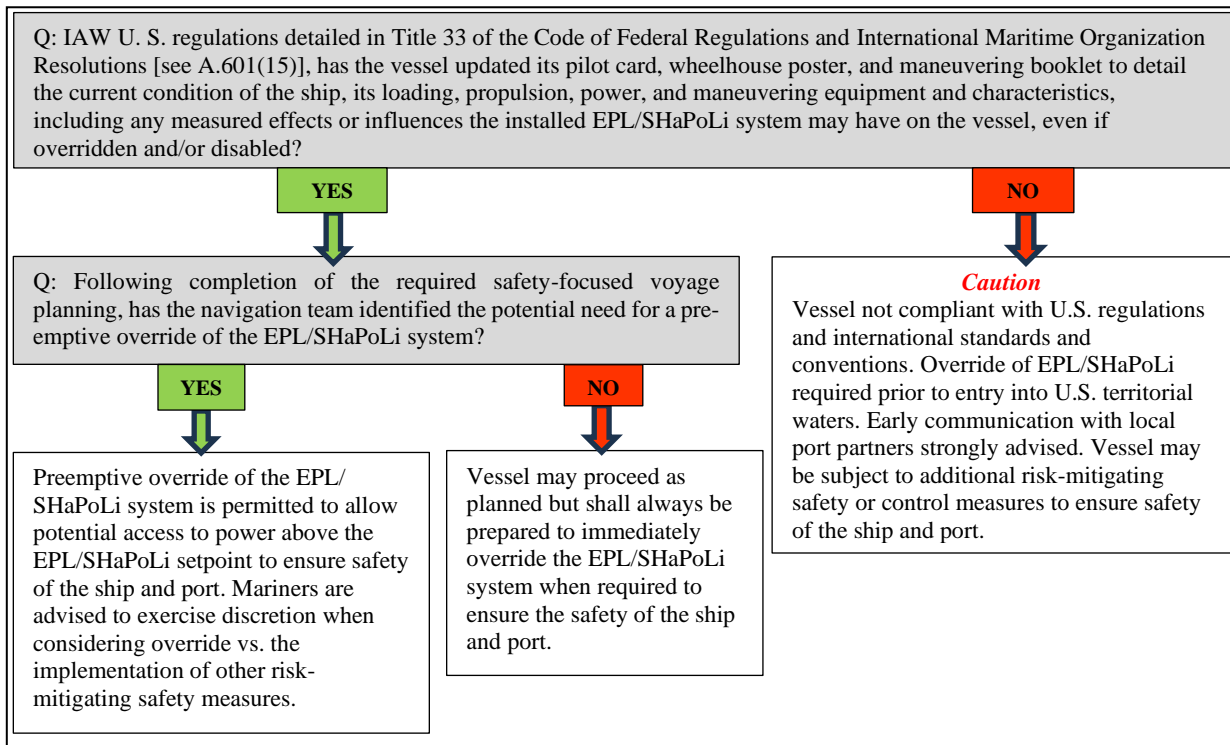
Additionally, master of ships employing an EPL, SHaPoLi or engine acceleration-limiting program as part of their EEXI compliance structure shall inform attending pilots the effect these programs have on the main propulsion plant, and the mechanism or procedure used to override those systems, should it become necessary to do so for safe navigation of the vessel [see Title 33 Code of Federal Regulations (CFR) § 164.11(k) and § 164.35(g)]. Attending pilots are also empowered to notify my office for potential follow-up action, whenever they are not informed of such information.

The accurate representation of maneuvering characteristics and limitations of ships on pilot cards and wheelhouse posters is vital to safe navigation, particularly in restricted waters. Specific expectations for pilot card and wheelhouse poster content can be found in IMO Resolution A.601(15), "*Provision and Display of Manoeuvring Information on Board Ships*." If a ship's maneuvering characteristics indicated on the pilot card and wheelhouse poster were not updated following installation of an EPL/SHaPoLi system or acceleration-limiting program, the ship is not in compliance with 33 CFR 164.11(k) and the system or program **MUST** be overridden prior to entry into U.S. territorial waters. Additionally, such ships may be issued a deficiency by Sector Houston-Galveston Port State Control Officers. If override is not feasible, the Coast Guard may

require additional measures to ensure the safety of the ship and the port during the vessel's transit through the AOR. Owner/operators of ships who have not updated their cards and posters are strongly urged to engage with Houston-Galveston-Freeport area pilots and Sector Houston-Galveston vessel inspection personnel well in advance of the ship's arrival to avoid potential delays.

Overriding the EPL/SHaPoLi to safely navigate in restricted waters does NOT constitute a MARPOL Annex VI violation, as these regulations do not apply to emissions necessary for securing the safety of a ship.

The following decision framework flowchart, for an existing ship with an installed EPL/SHaPoLi system that intends to operate in the U. S. territorial waters within the Sector Houston-Galveston AOR, is provided for reference:



Ships should follow existing IMO guidance for recording and reporting EPL/SHaPoLi override and reserve power usage to their respective Flag states and/or Recognized Organizations. U.S.-flagged ships shall make reports to Coast Guard Flag State Control (CVC-4) at FlagStateControl@uscg.mil. EPL/SHaPoLi override and power usage by any ship in U. S. waters must also be reported to the cognizant Officer-In-Charge, Marine Inspection.

This MSIB supplements and expands upon Sector Houston-Galveston MSIB 05-23 dated 17 February 2023.

Please contact Sector Houston-Galveston vessel inspection staffers at either HoustonPSC@uscg.mil or InspectionsMSUTexasCity@uscg.mil if you have any questions or require amplifying details.

K. M. DONOHUE
Captain, United States Coast Guard
Captain of the Port