
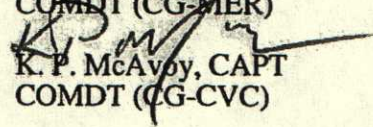




16450  
22 December 2014

## MEMORANDUM

From:   
C. C. Gelzer, CAPT  
COMDT (CG-MER)

  
K. P. McAvoy, CAPT  
COMDT (CG-CVC)

To: Distribution

Subj: VESSEL RESPONSE PLAN ACTIVATION

1. This memo is a reminder that USCG approved vessel response plans (VRPs) provide clear guidance to vessel operators, qualified individuals (QI), and USCG FOSCs/COTPs on the vessel's pre-designated marine salvors and oil spill removal organizations (OSRO) and how these entities are to be activated during a response.
2. Sector Commander's and MSU Commanding Officer's are routinely forced to make difficult decisions to effectively manage complex operations. The successful handling of commercial vessel casualties often can be particularly challenging as they require coordinated, simultaneous efforts from not only USCG Prevention and Response department personnel, but also marine salvage companies and/or OSROs, which are called upon to mitigate the casualty and prevent or minimize the threat of pollution.
3. The purpose of the VRP is to save the responsible party valuable time and ensure qualified and effective professionals are engaged safely and efficiently. When the master of a vessel determines that the resources and personnel available on board cannot meet the needs of an actual or potential incident, the master is expected to follow the procedures approved in the VRP. This means the resource providers identified in the VRP should be notified immediately and, as appropriate, activated when a discharge of oil, or a substantial threat of such a discharge of oil, exists. When the responsible party activates a resource other than what is identified in the VRP without prior FOSC authorization, the responsible party may be liable for a civil penalty.
4. The expectation to activate a vessel's VRP does not limit or dictate FOSC authority. FOSCs have the regulatory authority to approve a deviation from an approved VRP under exceptional circumstances and if the proposed alternative actions would clearly enable a more effective response. Before the FOSC authorizes an alternative however, they must know why the alternative is necessary. Any deviations authorized by the FOSC should be documented as part of the MISLE activity and other related incident response documentation, such as an Incident Action Plan.
5. Industry often invests heavily in exercises and includes participation by executive level personnel. We encourage the Command Cadre and other Coast Guard senior field

representatives to participate in exercises that involve response plan activation. This will further strengthen direct coordination between the plan holder and Coast Guard personnel, and open lines of communication vital to the preparedness and response to spills and other incidents.

6. We are exploring ways to enhance MER curricula [A-school (MST) and C-schools (FOSCR, PIR, OSC Crisis Management)] to raise awareness of the importance of response plan activation. Our staffs continue to work to update policy and guidance to the field in this and other areas. We will continue to mitigate environmental risk through a strong cooperative approach across Coast Guard Prevention and Response programs and partnership with sister agencies and industry representatives.

Dist: CG LANTAREA (LANT-35, LANT-55)  
CG PACAREA (PAC-35, PAC-54)  
All Districts (dp, dr, dx)  
All Sectors