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CG-CVC Policy Letter 16-06

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COMDT (CG-CVC)

To: Distribution

Subj: IMPLEMENTATION OF THE INTERNATIONAL CODE FOR SHIPS OPERATING
IN POLAR WATERS (POLAR CODE)

Ref: (a) International Code for Ships Operating in Polar Waters

1. **PURPOSE.** On January, 1 2017 the Polar Code will enter into force. This policy letter provides guidance regarding the implementation of the Polar Code, hereinafter referred to as the Code, on U.S. Flag ships and incorporates verification of compliance on foreign ships into the Coast Guard's Port State Control (PSC) Program. Vessel owners and operators, or their representatives, are encouraged to take advantage of the procedures and guidelines detailed in this policy, as amended. Area Commanders, District Commanders, Sector Commanders, Commanding Officer Marine Safety Center, and Officers in Charge, Marine Inspection (OCMIs) are encouraged to apprise industry representatives of this policy, as amended, and apply its provisions appropriately.
2. **ACTION.** The Coast Guard will use this policy as a guide to help ensure that ships subject to the provisions of the code are in substantial compliance with its provisions while operating in Polar Waters as defined in the Code. Officers in Charge, Marine Inspection (OCMIs) should bring this policy to the attention of the maritime industry within their areas of responsibility.
3. **DIRECTIVES AFFECTED.** None
4. **BACKGROUND.** In May 2015, the 68th session of the International Maritime Organization's (IMO) Marine Environmental Protection Committee (MEPC) adopted the environmental-related provisions of the Code and associated amendments to the International Convention for the Prevention of Pollution from Ships (MARPOL). In October 2014, the 94th session of the IMO's Marine Safety Committee (MSC) adopted the Code and associated amendments to the International Safety of Life at Sea (SOLAS) for certain ships operating in Polar Waters. Specifically, Chapter XIV was added to SOLAS and additional requirements were added to MARPOL Annexes I, II, IV and V. Additionally, amendments were made to Chapter V of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW) to reflect the training requirements for deck officers on board ships operating in Polar Waters. These amendments to STCW will enter into force on January 01, 2018.
5. **DISCUSSION.** The goal of the Code is to provide for safe ship operation and the protection of the polar environment by addressing risks present in Polar Waters which are not adequately mitigated by other IMO regulations. The Code contains two parts developed simultaneously at the IMO,

safety related provisions (Part I) and environment-related provisions (Part II). While these parts are related, they have independent applications based on their parent conventions, SOLAS and MARPOL. Part I is subdivided into Part I-A, which contains mandatory provisions on safety measures, and Part I-B which contains recommendations on safety. Part II is similarly subdivided into Part II-A, which contains mandatory provisions on pollution prevention, and Part II-B which contains recommendations on pollution prevention. The Code uses a risk-based approach to holistically reduce identified risks for ships operating in Polar Waters. However, in certain cases the requirements of the Code are non-prescriptive and subject to interpretation.

6. DISCLAIMER. This guidance is not a substitute for applicable legal requirements, nor is in itself a regulation. It is not intended to nor does it impose legally-binding requirements on any party. This guidance represents the Coast Guard's current thinking on this topic and may assist industry, mariners, the general public, and the Coast Guard, as well as other federal and state regulators, in applying statutory and regulatory requirements. Alternative approaches for complying with these requirements may be acceptable if the approach satisfies the requirements of the applicable statutes and regulations.
7. QUESTIONS. Questions or concerns regarding this policy may be directed to Commandant (CG-CVC) via e-mail to CG-CVC@uscg.mil.

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Encl: (1) Polar Code Implementation on U.S. Flag Ships
(2) Port State Control Verification of Polar Code Compliance

POLAR CODE IMPLEMENTATION ON U.S. FLAG SHIPS

1. Polar Code Applicability to U.S. Flag Ships:

- a. SOLAS Chapter XIV, unless expressly provided otherwise, applies to ships operating in Polar Waters, certified in accordance with SOLAS Chapter I. U.S. Flag vessels operating on domestic voyages to ports or places in the U.S. Arctic do not need to meet the provisions of SOLAS Chapter XIV but must instead comply with applicable domestic requirements.
- b. The MARPOL provisions of the Code (Parts II-A and II-B) apply as indicated in the specific annexes and are automatically brought into force under the Act to Prevent Pollution from Ships (APPS); 33 U.S.C. §§1901-1915. It should be noted that certain Code requirements, particularly related to MARPOL V, will be applicable to all U.S. ships trading in Polar Waters regardless of tonnage or voyage type.
- c. Ships constructed before January 1, 2017 that operate in Polar Waters will be required to meet the relevant requirements of the Code by the first intermediate or renewal survey, whichever occurs first after January 1, 2018. However, the Code does not identify the specific statutory certificate to which the intermediate or renewal survey is to be linked.
 - i. Passenger ships to which the Code is applicable should meet the relevant requirements of the Code by the first renewal survey for the Passenger Ship Safety Certificate conducted after January 1, 2018.
 - ii. Cargo ships to which the Code is applicable should meet the relevant requirements of the Code by the first intermediate survey or renewal survey for the Cargo Ship Safety Construction Certificate whichever occurs first conducted after January 1, 2018.
- d. The Code does not contain its own “tonnage threshold,” rather it invokes SOLAS Chapter I applicability and the relevant applicability of the amended MARPOL annexes. As such, the following guidance applies with regard to the Code’s applicability:
 - i. For ships with keel laid after July 18, 1994 and which did not subsequently undergo alterations resulting in a change in tonnage of a magnitude deemed by the Commandant to constitute a substantial variation in tonnage; apply GT ITC tonnage.
 - ii. For ships with keel laid on or before July 18, 1994 refer to Navigation and Inspection Circular (NVIC) 11-93, Change 3 “Applicability of Tonnage Measurement Systems to U.S. Flag Vessels” and Title 46 Code of Federal Regulations (CFR) 69.20 “Applying Tonnage Thresholds.”
 - iii. For ships less than 79 feet in overall length, the Convention Measurement System is not applicable. For these ships, use GRT tonnage for the purpose of the Code’s applicability in accordance with 46 CFR 69.20 “Applying Tonnage Thresholds.”

2. Ship Survey and Certification Options:

- a. Ships classed by a U.S. Coast Guard Authorized Classification Society (ACS) should seek certification with the Code under the applicable rules of the ACS. ACS Surveys for U.S. Flag ships should be completed in accordance with the Harmonized System of Survey and Certification, 2011, adopted by IMO resolution A.1076(28).
- b. The Coast Guard does not plan to issue Polar Ship Certificates to U.S. Flag ships that are classed by an ACS. U.S. Flag ships that are not classed by an ACS, subject to the Code and engaged on international voyages should submit an Application for Inspection (CG-3752) to the Cognizant OCMI).

3. Additional Guidance and Interpretation:

a. Parts I-A and I-B (SOLAS Provisions):

- i. The Coast Guard recognizes that there is no single solution for what will be considered “acceptable” in terms of meeting the functional requirements of the Code. In this way, the Code is very similar in approach to the International Safety Management (ISM) Code and the International Ship & Port Facility Security (ISPS) Code, which rely heavily on the owner/operator to develop processes that adequately address a specific ship and operation.
- ii. Timely communication is key to any successful initial ship certification process. Owners/operators planning new construction projects intended for polar operations are encouraged to contact the Marine Safety Center (MSC) and/or ACS as early as possible in the design phase.
- iii. With regard to scantlings of Category A and Category B ships, the Coast Guard accepts the applicable standards of IACS as noted in the Code’s footnotes of Regulation 3.3.2.
- iv. Ships that are not assigned a Polar Class notation under IACS URI Requirements concerning Polar Class (e.g. Category C Ships), may submit for an equivalency via their ACS to the MSC. The process for equivalency is outlined in Part 1B, Chapter 4 of the Code.
- v. Existing ships with a record of sustained performance while operating in Polar Waters may be considered for continued polar operation without structural modification. Prior service experience in Polar Waters should be accounted for in the operational risk assessment and will be considered on a case-by-case basis by the MSC. Any limitations or restrictions for existing ships should be recorded on the Polar Ship Certificate.

- vi. The Coast Guard encourages owners and operators to become familiar with the Polar Operation Limit Assessment Risk Indexing System (POLARIS) in addition to existing national systems if available, such as the Canadian Arctic Ice Regime Shipping System known as the AIRSS system. These systems may assist in accurately assessing operational limitations.
- vii. The Code makes several references to ‘exposed’ locations with regard to materials, fire systems, icing, machinery and electrical systems. It is the Coast Guard’s interpretation that “exposed” means: *Those areas where the temperature is otherwise uncontrolled from that of the marine environment and/or the specified systems, materials and equipment are otherwise unprotected from snow and ice accumulation.*
- viii. There are no prescribed geographic operating areas associated with a particular class of ship (Category A/B/C). Ship owners and operators should ensure that the category of the ship is appropriate for anticipated ice conditions as described in the Code for the intended voyage.
- ix. Unless expressly provided otherwise in the Code, ship systems and equipment addressed in the Code shall satisfy at least the same performance standards referred to in SOLAS. If no specific approval standard is specified, the equipment should be suitable for the purpose intended and fully functional at the specified Polar Service Temperature.
- x. Ship owners and operators should be able to provide evidence that equipment is designed for use below the specified Polar Service Temperature. Examples of such evidence may include, but are not limited to independent lab tests, foreign type approval, classification society approval, industry standard, or equipment operating manuals.
- xi. When performing operational assessments, ship owners/operators and ACS representatives are encouraged to consult with the Cognizant Officer in Charge, Marine Inspection and/or local stakeholders to ensure the full scope of a proposed operation is known and all associated risks identified. Consulting these parties will ensure that any local knowledge or specific OCMI/Captain of the Port (COTP) policies (e.g. local ice guidelines) are sufficiently accounted for. The operational assessment report should be reviewed by the ACS and/or OCMI, as applicable.
- xii. The Polar Water Operations Manual (PWOM) should be developed taking into account the operational assessment. The PWOM may be reviewed by the ACS and/or OCMI, as applicable.

- xiii. The COTP for U.S. ports located within polar regions, should work with local stakeholders to ensure that there is adequate information and guidance available for owners and operators to consider when conducting their risk assessments and developing the PWOM. Such guidance may be developed and published through port terminals, Harbor Safety Committees, Coast Pilot, or local bulletins.
 - xiv. Owners and operators should take seasonal operations into account when performing the operational risk assessment and developing the PWOM. ACS and/or OCMI should ensure seasonal limitations are captured on the Polar Ship Certificate. It is incumbent upon owners, operators and ship masters to ensure that voyages in Polar Waters are completed as outlined in the PWOM and in compliance with the standards prescribed in the Code.
 - xv. The Code requires that ships operating in Polar Waters are appropriately manned by adequately qualified, trained and experienced personnel. Ship owners and operators are encouraged to reference CG-OES Policy Letter No. 01-16, Guidelines for Training of Personnel on Ships Subject to the Code.
- b. Parts II-A and II-B (MARPOL Provisions):
- i. In Polar Waters any discharge into the sea of oil, oily mixtures, and noxious liquid substances (NLS) from a ship subject to MARPOL Annex I or II, as applicable, is prohibited. Ships with an International Oil Pollution Prevention Certificate (IOPP) should contact their ACS for an updated Supplement (Form A/B, as applicable).
 - ii. The United States is not a signatory to MARPOL Annex IV (Sewage). However, all ships should adhere to the sewage discharge provisions of the Code, Part II-A, Chapter 4. Those ships that have been issued an International Sewage Pollution Prevention Certificate, Statement of Voluntary Compliance (SOVC) shall adhere to the discharge standards for the continued validity of the certificate.
 - iii. In Polar Waters, discharges of garbage into the sea shall meet regulation 4 of MARPOL Annex V and additionally meet the requirements specified in the Code, Part II-A, Chapter 5.
 - iv. In the Antarctic area, discharge of garbage into the sea permitted in accordance with regulation 6 of MARPOL Annex V, shall meet the additional requirements specified in the Code, Part II-A, Chapter 5.
 - v. Operations in Polar Waters should be incorporated, as appropriate, into the Oil Record Books (ORB), Shipboard Oil Pollution Emergency Plan/Shipboard Marine Pollution Emergency Plan (SOPEP/SMPEP), Garbage Record Book Garbage placards, and Garbage Management Plan. This requirement does not mean that additional entries are required, rather, that existing required entries contain sufficient detail to demonstrate compliance with the additional discharge restrictions detailed in the Code.

Port State Control Verification of Polar Code Compliance

1. General:

- a. Foreign flagged ships trading in U.S. Polar Waters will be subject to Port State Control (PSC) to include verification that the ship is substantial compliance with the Code.
- b. Compliance verification for foreign flagged ships that operate in Polar Waters as defined in the Code shall be conducted during regularly-scheduled PSC examinations and follow the process and scope as detailed in this enclosure.
- c. Port State Control Officers (PSCO) should consult the Code if further information related to the specific regulations is required. Additionally, the guidance in this policy letter shall not replace or reduce the scope of any PSC examination and is not intended to replace any existing OCMI/COTP policies (e.g. local ice guidelines).

2. Application to Foreign Flag Ships:

- a. Part I (Safety) of the Code applies to SOLAS certified ships operating in Polar Waters.
- b. Part II (Pollution Prevention) of the Code applies to ships operating in Polar Waters under the following MARPOL Annexes:
 - i. Annex I: Oil Tankers of 150 GT ITC and above and all other ships of 400 GT ITC and above.
 - ii. Annex II: All ships certified to carry noxious liquid substances in bulk.
 - iii. Annex IV¹: Ships 400 GT ITC and above and all ships certified to carry more than 15 persons.
 - iv. Annex V: All ships.
- c. Ships constructed before January 1, 2017 that operate in Polar Waters will be required to meet the relevant requirements of the Code by the first intermediate or renewal survey, whichever occurs first after January 1, 2018. However, the Code does not identify the specific statutory certificate to which the intermediate or renewal survey is to be linked.
 - i. Passenger ships to which the Code is applicable should meet the relevant requirements of the Code by the first renewal survey for the Passenger Ship Safety Certificate conducted after January 1, 2018.

¹ The United State is not a signatory to MARPOL Annex IV and has no authority to enforce its provisions.

- ii. Cargo ships to which the Code is applicable should meet the relevant requirements of the Code by the first intermediate survey or renewal survey for the Cargo Ship Safety Construction Certificate whichever occurs first conducted after January 1, 2018.
3. Pre-Boarding Procedures: Units shall utilize current policy guidance when targeting ships for PSC examinations. When a ship has been selected for a PSC examination either by points in the targeting matrix or by random selection, units should attempt to establish information regarding the trade area of the ship with respect to polar operations prior to initiating PSC actions. If the ship has arrived from or is scheduled to operate in a polar region as defined by the Code, the ship shall be examined for compliance with the Code and shall be guided by the provisions of the Code as explained by this policy letter.
4. PSC Procedures for Safety Measures:
 - a. The Polar Ship Certificate: The Code requires ships operating or intending to operate in Polar Waters to obtain and maintain a valid Polar Ship Certificate and Record of Equipment Supplement. All dates and endorsements on the Polar Ship Certificate and supplement should be harmonized with the relevant SOLAS certificates in accordance with the provisions of regulation I/14 of the SOLAS Convention. If the ship does not have a Polar Ship Certificate and the next planned voyage is to a polar area, the ship's flag administration should be notified. The Polar Ship Certificate identifies that the ship has been designed for operation in Polar Waters under one of the following categories:
 - i. Category A ship: ships designed for operation in Polar Waters at least in medium first-year ice, which may include old ice inclusions;
 - ii. Category B ship: a ship not included in category A, designed for operation in Polar Waters in at least thin first-year ice, which may include old ice inclusions; or
 - iii. Category C: a ship designed to operate in open water or ice conditions less severe than those included in Category A and B.
 - b. Polar Waters Operation Manual (PWOM): The PSCO should verify that the ship carries a PWOM. Though not required to be approved by the ship's flag administration, the PWOM is designed to address aspects of the ships operations as outlined in Chapter 2 of Part I-A in the Code. The PWOM may cross-reference information, procedures, or other applicable plans contained in other areas of the ship's documentation. The PWOM need not replicate such material. The PSCO should verify that the PWOM is on board and contains procedures for the operations set out in Chapter 2 of the Code either directly or by cross-reference if procedures or plans exist elsewhere on the ship. If the PSCO determines that the PWOM is missing required information or discovers clear evidence that the procedures documented are deficient, an audit of the manual should be requested by the ship's classification society. PSCOs should not conduct a systematic audit of the procedures documented in the PWOM.

- c. Ship Structure: Materials and scantlings of the structure should retain their structural integrity when subjected to environmental loads and conditions. The Polar Ship Certificate issued to the ship should be taken as sufficient evidence that the ship's scantlings were approved for compliance with the applicable regulations for the ship's structure as detailed in the Code. PSCOs shall continue to follow existing PSC exam guidance with respect to deck and hull structure as describe in Volume II of the Marine Safety Manual.
- d. Subdivision and Stability: Adequate subdivision and stability should be maintained in both intact and damaged conditions. The Polar Ship Certificate issued to the ship should be taken as sufficient evidence that the ship has been surveyed to ensure its stability in intact and damaged conditions are in compliance with the Code for the appropriate category of ship.
- e. Watertight and Weathertight Integrity: Measures should be provided to maintain watertight and weathertight integrity of the ship. The ship shall have a means to remove or prevent ice from forming around doors and hatches relevant to watertight/weathertight integrity. For ships intended to operate in low air temperatures as defined in Chapter 1 of the Code, relevant hydraulically operated hatches and doors shall be provided with a means to prevent freezing or excessive viscosity of liquids. Because the Code does not provide guidance on how a ship should meet this requirement, PSCOs should discuss the ship's procedures with the master and crew to determine proper effectiveness. Additionally, doors, hatches, and closing devices shall be capable of being operated by personnel wearing heavy weather clothing. PSCOs need not examine every door or hatch but at a minimum should, spot-check compliance as part of the ongoing PSC exam.
- f. Machinery Installations: Machinery installations shall be capable of delivering the required functionality necessary for the safe operation of the ship. The Polar Ship Certificate issued to the ship should be taken as sufficient evidence that the Ship's machinery installations comply with the Code for the appropriate category of ship. The PWOM should provide information on how the ship prevents or mitigates ice ingestion by seawater systems. PSCOs may use this information to verify these systems can function under the anticipated environmental conditions.
- g. Fire Safety/Protection: Fire safety systems and appliances shall be effective and operable for polar operations with a means of escape available so that persons on board can safely escape to the lifeboat and life raft embarkation deck under the expected environmental conditions. PSCOs should ensure the ship's fire pumps are located in compartments above freezing and there are means of draining exposed sections of the fire main. Firefighter's outfits shall be stored in warm locations on the ship and any portable and semi-portable extinguishers shall be protected from freezing temperatures as far as practical. Additionally, the ship shall have a means to remove or prevent ice and snow from pathways to embarkation decks.
- h. Lifesaving Appliances and Arrangements: Appliances and arrangements shall provide for the safe escape, evacuation, and survival of all persons on board. PSCOs should review the required amount of lifesaving appliances listed on the Polar Ship Certificate's Record of Equipment and spot-check items to ensure the ship is in compliance. When examining personal and group survival equipment, PSCOs may reference the suggested list of equipment located in Part I-B, paragraphs 9.1 and 9.2 of the Code as a guide.

- i. Safety of Navigation: The navigational equipment and systems shall be designed, constructed and installed to retain their functionality under the expected environmental conditions and provide for the safe navigation of the ship in ice conditions. PSCOs should review the required navigational equipment listed on the Polar Ship Certificate's Record of Equipment and spot-check items to ensure the ship is in compliance. Additionally, PSCOs should ensure mechanical equipment for wiping and or de-icing conning position windows is operational and protected from freezing and the accumulation of ice. Because the Code does not provide guidance on how a ship should meet this requirement, PSCOs should discuss the ship's procedures for de-icing with the master and crew to determine proper effectiveness.
 - j. Communication: The ship and survival craft shall be provided with effective communications during normal operations and emergency situations. PSCOs should review the required communications equipment listed on the Polar Ship Certificate's Record of Equipment and spot-check items, especially for rescue boats, lifeboats, and survival craft to ensure the ship is in compliance.
 - k. Voyage Planning: The company, master, and crew should be provided with sufficient information to enable operations to be conducted with due consideration to the safety of the ship, persons on board, and the protection of the environment. The Polar Ship Certificate issued to the ship should be taken as sufficient evidence that the ship's master and crew are competent to devise and execute a voyage plan that take into account the requirements of the Code.
 - l. Manning and Training: Ships operating in Polar Waters are to be appropriately manned by adequately qualified, trained and experienced personnel. Amendments made to Chapter V of the STCW Convention and Code prescribe the training requirements for deck officers on board ships operating in Polar Waters. These amendments will enter into force on January 1, 2018. Once these amendments come into force, masters, chief mates, and officers in charge of a navigation watch will be required to hold a certificate in basic and or advanced training for ships operating in Polar Waters. Flag administrations may allow the use of a person(s) other than the master, chief mate, or officers of the navigation watch to satisfy the requirements for training in paragraph 12.3.1 of the Polar Code provided they meet the requirements in paragraph 12.3.2. Until the relevant STCW amendments come into force, PSCOs should not issue deficiencies or detain ships if seafarers are not able to provide proof of meeting the applicable training requirements.
5. Port State Control (PSC) Procedures for Pollution Prevention Measures:
- a. Prevention of Pollution by Oil: In Polar Waters any discharge into the sea of oil or oily mixtures from any ship is prohibited. Under certain circumstances, ships constructed before January 1, 2017 may receive approval from their flag administration to discharge oil or oily mixtures from machinery spaces under the requirements of regulation 15.3 of MARPOL Annex I until their first intermediate or renewal survey, whichever comes first, one year after January 1, 2017. Additionally, the Polar Ship Certificate issued to the ship should be taken as sufficient evidence that the ship has been surveyed to ensure the structural requirements of Chapter 1 of Part II-A of the Code have been approved by the flag administration. PSCOs should review logbooks and records for MARPOL Annex I violations, as modified by the Code, as part of the ongoing PSC exam.

- b. Control of Pollution by Noxious Liquid Substances (NLS): In Polar Waters any discharge into the sea of NLS or mixtures containing such substances from any ship is prohibited. PSCOs should review logbooks and records for MARPOL Annex II violations, as modified by the Code, as part of the ongoing PSC exam.
 - c. Prevention of Pollution by Sewage: The discharge of sewage within Polar Waters is prohibited except when performed in accordance with MARPOL Annex IV, as modified by the Code. Because the United States is not a signatory to MARPOL Annex IV, PSCOs should ensure ships comply with the marine sanitation device requirements found in 33 CFR 159.7 and the additional discharge requirements as prescribed in the Code. It should be noted that 33 CFR 159 Subpart E contains additional regulations for the discharge of effluents by cruise ships operating in Alaska waters. PSCOs should review logbooks and records as part of the ongoing PSC exam to ensure any discharge of sewage is within the requirements of the Code and 33 CFR 159.
 - d. Prevention of Pollution by Garbage: The discharge of garbage within Polar Waters is permitted when performed in accordance with regulation 4 of MARPOL Annex V, as modified by the Code. PSCOs should review logbooks and records as part of the ongoing PSC exam to ensure any discharge of garbage is within the requirements of the Code.
6. Expanded Examinations: The PSCO should expand the exam if there are "clear grounds" that the ship, its equipment, or its crew, do not correspond substantially with the particulars regarding the requirements of the Code as would be done on any PSC exam. Expanded exams should focus on those areas where "clear grounds" exist and should not include other areas or systems unless it is being done as part of issues found in other areas of the PSC exam.
 7. Deficiencies Warranting Detention: The authority for the COTP to detain a vessel under the Code is derived from 33 USC § 1223(b). PSCOs should use professional judgment in deciding whether a deficiency(s) should rise to the level for detaining the ship. Additionally, a detention should not be initiated under the Code unless the ship is currently operating in or has immediately returned from Polar Waters. Some examples of detainable deficiencies relating to the Code are:
 - a. Missing or invalid Polar Ship Certificate.
 - b. Missing or incomplete PWOM.
 - c. Missing or defective equipment required under the Polar Ship Certificate.
 8. Documenting the Exam: Units shall document the results no differently than any other PSC examinations using the Coast Guard Port State Control Report of Inspection Form A, CG-5437A and Coast Guard Port State Control Report of Inspection Form B, CG-5437B in accordance with the procedures detailed in the Marine Safety Manual Vol. II. When documenting the exam activity in MISLE, "Polar Code Examination" shall be entered along with all other applicable inspection types and the Polar Ship Certificate details added accordingly. Deficiencies related to the Code shall be entered into MISLE conforming to current MISLE data entry requirements and using the appropriate reference citation from the Code.