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factors. Requiring owners and captains to implement crew rest policy would give crewmembers the opportunity to reduce their risk of fatigue-related accidents and help prevent casualties.

Action: I do not concur with this recommendation. While implementation of shipboard policies that address crew rest, work hours, and fatigue based on the principles of the Coast Guard's Crew Endurance Management System (CEMS) could benefit the safety of commercial fishing vessels; it is not appropriate to be imposed as a regulatory requirement. However, a voluntary approach similar to that undertaken by some members of the towing vessel industry could benefit the commercial fishing industry. I will direct the Commanders of the Thirteenth and Seventeenth Districts to prepare and implement, with assistance from Commandant (CG-CVC-3), an outreach plan that addresses this topic within their respective areas of responsibility.

### **ACTION ON ADMINISTRATIVE RECOMMENDATIONS**

Recommendation 1: Recommend Sector Puget Sound, consistent with MOC Policy Letter 04-07, rescind acceptance of the NAVTECH/USSA third party surveyor who conducted the last dockside safety examination on the DESTINATION in June 2016. This will ensure the third party surveyor does not conduct another dockside safety examination until NAVTECH/USSA has provided the surveyor remedial training on CFV stability compliance verification and has recertified the surveyor to conduct Coast Guard third party examinations.

Action: I concur with the intent of this recommendation. The Coast Guard's Office of Commercial Vessel Compliance, Fishing Vessel Safety Division, Commandant (CG-CVC-3) has oversight responsibility for approval of Third Party Organizations (TPO) that are permitted to conduct commercial fishing vessel examinations on behalf of the Coast Guard. The June 2016 dockside examination form discrepancies and report, as well as surveyor statements made to the Marine Board are of concern. I will direct NAVTECH/USAA to conduct an internal assessment of their Fishing Vessel Safety Examiner program, to include how they qualify and maintain designated examiner competency. NAVTECH/USAA's internal assessment should include how corrective actions and/or remedial training is assigned when non-conformities within their Fishing Vessel Safety Examiner program are discovered. I will also direct CG-CVC-3 to conduct a site-visit to assess this and NAVTECH/ USAA's related inter-company TPO procedures.

Recommendation 2: Recommend Sector Anchorage initiate Civil Penalty proceedings against the owner of the DESTINATION for failing to provide the captain with accurate stability instructions to maintain the vessel in a satisfactory stability condition, as required in 46 CFR 28.530.

Action: I concur with the recommendation. The alleged violations will be referred to the Sector Commander, Anchorage, for further investigation and enforcement action, as appropriate.