May 1, 2013

MEMORANDUM FOR: A.I.S., Inc.,
East West Technical Services,
Fathoms Research LLC, and
MRAG Americas
At-Sea Monitors, Industry Funded Scallop Observers, and
Northeast Fisheries Observer Program Observers

FROM: Amy S. Van Atten
Branch Chief, Fisheries Sampling Branch (FSB)

SUBJECT: Instructional Update for Completing the Pre
Trip Vessel Safety Checklist (PTVSC) and EPIRB Visual
Inspection Card (EVIC)

The purpose of the Pre Trip Vessel Safety Checklist (PTVSC) is to improve safety at sea for all
observers, increase personal safety awareness, and provide accurate, vessel specific, safety
information to Northeast Fisheries Observer Program (NEFOP) staff. These data are then
closely reviewed and can be shared with other observers. The review process includes
comparing data collected from previous trips.

The PTVSC is designed to be scanned. The character recognition scanning program is very
sensitive. Therefore, when completing the PTVSC, please be neat and clear. There have been
significant problems with scanning due to improper completion, markings outside boxes, etc.
This leads to data processing delays. Please read and closely follow these instructions to help
make the process more efficient.

- DO NOT make any markings or notes outside of the designated areas on the front of the
  PTVSC. If you have comments, record them in the appropriate section on the back of the
  PTVSC.
- ONLY make comments regarding safety concerns (stability, lack of wheel watch, crew
  behavior, vessel condition, etc), an explanation as to why a field was left blank or if you
  had any difficulties collecting the required information.
- DO NOT put slashes (/) or dashes (-) between the boxes when recording any of the
  expiration dates.
- All equipment expiration dates are to be recorded in the MM/YY format (2 digit month
  and 2 digit year).
- All recorded information should be written clearly and as dark as possible. Completely
  shade in appropriate boxes.
Do not make photocopies of the PTVSC. There are specific parameters to the layout of the checklist which must be precise in order for it to be scanned properly. If you need more copies of the PTVSC contact your Program Manager or Mike Tork (508) 495-2339 or Lauren Carroll (508) 495-2212. You can also print a copy directly from NEFSC Fisheries Sampling Branch website (http://www.nefsc.noaa.gov/femad/fsb/).

Emergency Position Indicating Radio Beacon (EPIRB)

Methods for verifying the EPIRB hydrostatic release, battery and registration expiration dates:

Visual inspection
The captain or a qualified crew member removes the EPIRB from the mounting bracket or housing unit for the observer to visually inspect the hydrostatic release, battery and NOAA Search and Rescue Satellite Aided Tracking (SARSAT) registration\(^1\) expiration dates and confirm that the alphanumeric Unique Identification Numbers (UIN) on the EPIRB match\(^2\). Shade the YES box for EPIRB and record the expiration dates in the appropriate boxes on the front of the PTVSC. Complete an EPIRB Visual Inspection Card (EVIC)\(^3\) and issue it to the captain, explaining the use and ask that he/she retain the card for 90 days. Complete the back, bottom section of the PTVSC by shading the Visual Inspection box. Carefully record the EVIC number and date issued. Observers are NEVER allowed to remove the EPIRB from its bracket or housing unit to conduct a visual inspection.

Previously issued EPIRB Visual Inspection Card (EVIC)
The observer will NOT record the expiration dates on the front of the PTVSC, but would shade the YES box for EPIRB. The observer will record the previously issued EVIC number and the date the card was issued in the second box on the back of the PTVSC.

Approved USCG documentation
Acceptable documentation would be the United States Coast Guard (USCG) Commercial Fishing Vessel Safety Exam (CFVSE) form that lists all the EPIRB expiration dates (hydrostatic release, battery, NOAA registration and the UIN ("Beacon ID")). The exam form must have been completed within the last 90 days. If these criteria are met then shade the YES box for EPIRB and record the expiration dates on the front of the PTVSC. Shade the Approved USCG documentation box on the back of the PTVSC and provide comments in the comment section. Do not issue and EVIC. If the examination form does not include the expiration dates, UIN or the safety exam is older than 90 days, the observer is required to visually inspect the EPIRB.

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\(^1\) Refer to section “NOAA SARSAT EPIRB Registration” section for additional information
\(^2\) Refer to section “Matching the alphanumeric code (UIN) on the NOAA SARSAT decal to the UIN code on EPIRB” for additional information
\(^3\) Refer to section “Issuing an EPIRB Visual Inspection Card (EVIC)” section for additional information
Matching the alphanumeric code (UIN) on the NOAA SARSAT decal to the UIN code on EPIRB

As required by law, a U.S. coded 406 MHz beacon (EPIRB) must be registered with NOAA. It is also required that the registration be updated with NOAA if there is any change in contact information (phone number, address, etc.). The Unique Identification Number (UIN) is an alphanumeric code assigned to a specific EPIRB by the manufacturer. The manufacturer places a sticker on the EPIRB with that UIN. This UIN should match the UIN that is printed on the NOAA COSPAS SARSAT decal (Figure 1) to ensure that the EPIRB is properly registered with NOAA. If the UINs do not match it could cause a delay in search and rescue efforts. If an observer encounters a situation where the UINs clearly do not match and the situation cannot be rectified then the observer would complete the Safety Deficiency Reporting (SDR) procedures and not deploy on the trip. It is anticipated that there will be minimal instances when the two UINs do not match. If one of the UINs is illegible the observer will not make the trip and not issue an SDR.

NOAA SARSAT EPIRB Registration

The EPIRB registration information is located on the NOAA COSPAS SARSAT decal in the lower left hand corner under “Owner” which will list a person or business name or “VSL” which will list the vessel name (Figure 1). If the observer is unsure of the vessel owner information they should ask the captain. The registration date is located in the upper portion of the decal under “PROOF OF REGISTRATION EXP DATE” (Figure 1). EPIRB NOAA registrations are valid for two years. If the registration date is expired the observer would complete the Safety Deficiency Reporting (SDR) procedures and not deploy on the trip. If an expired registration is encountered, the vessel owner or captain can reregister the EPIRB by going online to: https://beaconregistration.noaa.gov/rgdb/

A confirmation email or screen shot that shows that the EPIRB is currently registered with NOAA is acceptable and can be used if the vessel registered the EPIRB and is just waiting for the decal to arrive.

Additional EPIRB information

Category I - Hydrostatically released and automatically activated
Category II - Manually released and activated

There are some older models of a Category I EPIRB that are attached with a mounting bracket in which the hydrostatic release is located inside the bracket (Figure 2). For that situation only, paperwork noting the hydrostatic release expiration date will suffice. Paperwork could include:
- USCG documentation that lists the expiration date and was issued within the last 90 days
- A receipt showing that the hydrostatic release was purchased within the last 2 years
- A sticker placed by the manufacturer or installer with a legible expiration date
- A previously issued EVIC

Please provide comments in the comment section. If there is no paperwork then the mounting bracket will need to be removed by the captain or a qualified crew member so that the observer can visually inspect the hydrostatic release. If the observer does visually inspect the EPIRB hydrostatic release, they will complete, and issue, an EVIC.
EPIRBs that are considered a Category II (Figure 3) are manually released and activated. They do not have a hydrostatic release. Category II EPIRBs are only approved for vessels less than 36' or any vessel manufactured with inherently buoyant material (operator must provide a builders certificate). When these types of EPIRBs are encountered shade in the YES box for EPIRB and leave the hydrostatic release expiration date blank on the front of the PTVSC. Provide comments on the back of the PTVSC.

An observer may not deploy on a vessel that has borrowed an EPIRB from another vessel in order to meet the EPIRB requirement. The borrowed EPIRB will not be registered to the correct vessel and rescue efforts may potentially be delayed.

If you are unable to visually inspect the EPIRB because the captain or crew are unwilling to assist, and if documentation with the appropriate expiration dates is absent, the observer will complete the Safety Deficiency Reporting (SDR) procedures and not deploy. If you are unable to inspect the EPIRB because you deem conditions unsafe (icing, etc.), and proper paperwork is absent, then do not issue an SDR and not deploy. Comments must be provided if this occurs.

Issuing an EPIRB Visual Inspection Card (EVIC)

The purpose of the EVIC is to provide observers with additional options and flexibility when inspecting EPIRBs and to reduce the burden placed on the fishermen in having to remove the EPIRB for a visual inspection every trip. To issue a card, an observer MUST visually inspect the EPIRB and record the hydrostatic release, battery and NOAA registration expiration dates and note whether the UINs match on the front of the PTVSC (Figure 4). When completing the EVIC please note that there are two sections (Figure 5). The first (top) section is to be used if all the EPIRB expiration dates will NOT expire over the next 90 days. The lower section is to be completed if one, or more, of those items WILL expire over the next 90 days. Only complete one of those sections and make sure to sign and record observer ID. The observer will explain the purpose of the card to the captain, inform him/her that the card is good for 90 days, and recommend that the card be kept in an accessible area to show to future observers. An observer has the option to visit a vessel the day before departing on a trip to issue an EVIC and complete the EPIRB section of the PTVSC. Again, this is in place to help eliminate some of the stress associated with checking the EPIRB at the beginning of the trip.

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4 Correction from December 2009 memo Instructions for Completing the Pre Trip Vessel Safety Checklist (PTVSC) and EPIRB Visual Inspection Card (EVIC) that stated “Category II EPIRBs are only approved for vessels less than 36’ that have manufacturer installed buoyancy.”
Two other scenarios when an EVIC might be issued:

1. The current EVIC is close to expiring, but will not during the trip. The observer may decide to use the current EVIC for completing the PTVSC before deploying. During the steam home or once the vessel returns to port the observer may then, with the assistance of captain or crew, visually inspect the EPIRB and record the expiration dates and new EVIC number in the comments section on the back of the PTVSC.\(^5\) The observer would then issue the new EVIC to the captain.

   - We expect observers to be considerate of future observers by issuing a new EVIC before the old one expires.

2. If the observer is at the dock doing dock rounds or arranging future trips, and wanted to be proactive, he/she may complete and issue an EVIC. The observer would complete a PTVSC by filling in ONLY the following fields: Vessel Name, Observer ID (instead of Trip ID), Hull Number, all EPIRB fields and completing the appropriate section on the back of the PTVSC.

   - The PTVSC can be mailed separately or with the observer’s next trip.

   - This procedure can also be used by Area Coordinators, Program Managers and NEFOP staff\(^7\)

Life Raft

The life raft on a vessel needs to be visually inspected before every trip in order to obtain the expiration dates for the hydrostatic release and annual repacking/servicing, as well as to make sure the raft has sufficient capacity for everyone on board (including the observer) and that the hydrostatic release mechanism is configured correctly. If it is truly unsafe (e.g. icing conditions) to get on top of the wheelhouse to inspect the life raft, the observer would not deploy on the vessel and NOT complete the safety deficiency reporting (SDR) procedures\(^6\). If the life raft is considered “float free” and does not have a hydrostatic release but instead has a weak link, indicated by a red line or thin wire between the painter line and the deck or cradle (Figure 6), the observer would leave the hydrostatic release expiration dates boxes blank and make a comment in the comments section on the back of the PTVSC. If a vessel has a “hard shell”, “egg” or “pod” style survival craft (Figure 7) it does not have an annual servicing requirement. In this case, the observer would record the hydrostatic release expiration date, leave the raft service date blank and make a comment on the back of the PTVSC. If a vessel has a rigid or inflatable buoyant apparatus (Figure 8 & 9) the observer will fill in the “NR” (not required) check box and comment. A rigid buoyant apparatus is approved for vessels fishing within 12 miles of shore that are <36’ with >3 persons on board (POB) or >36’ with ≤3 or POB. An inflatable buoyant apparatus is approved for vessels fishing within 12 miles of shore that are ≥36’ or more with ≥3 POB. Vessels that are <36’ and have ≤3 POB, and operating within 12 miles of shore, are not required to have survival craft. If a vessel has a life raft on board all expiration dates need to be current, regardless if the vessel meets the requirements to not have to carry a life raft. An expired

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\(^5\) Update from the December 2009 memo Instructions for Completing the Pre Trip Vessel Safety Checklist (PTVSC) and EPIRB Visual Inspection Card (EVIC) which stated that the observer should fill out a separate PTVSC to record the expiration dates and EVIC information.

\(^6\) Update from the December 2009 memo Instructions for Completing the Pre Trip Vessel Safety Checklist (PTVSC) and EPIRB Visual Inspection Card (EVIC) which stated that an observer could use the USCG Safety Examination form (if issued within the last year) that documents the raft service and hydrostatic release expiration dates as proof that the raft is good.
life raft either needs to be removed from the vessel or be marked that it is for “training” or “demonstration” purposes only.

Annual servicing and hydrostatic release expiration dates
Life raft service and hydrostatic release expiration dates should be relatively easy to obtain and should not require the assistance of the captain or crew. The raft hydrostatic release is good for two years and the raft repacking/service date is good for 1 year (brand new rafts are good for 2 years). The life raft service date is usually a sticker placed on the canister by the facility that last performed the inspection. If an observer encounters a situation where the expiration date is not marked off on the hydrostatic release, they can ask the captain to provide a dated receipt showing the purchase of the hydrostatic release and suggest that the captain mark the expiration date (2 years from the purchase date) on the hydrostatic release. If the captain cannot provide documentation noting the purchase or installation date of the hydrostatic release the observer will not deploy on the trip. NEFOP Fisheries Sampling Branch (FSB) will follow up with the vessel.

Capacity
Record the capacity of the life raft on board the vessel in a two digit format. For example, if it is a six person life raft, record ‘06’. The capacity of the life raft should accommodate everyone, including the observer, for the duration of the trip. If the presence of the observer exceeds the capacity of the life raft then arrangements should be made, by the contractor, to supply the vessel with a valise life raft. A valise life raft is provided as a courtesy to meet life raft capacity requirements, however, it cannot be used to supplement the raft on board the vessel if the annual servicing of hydrostatic release dates are expired. If a valise life raft is not available then the captain can choose to either leave a crew member on shore, or obtain another life raft of sufficient capacity for everyone on board. In the case of the latter, the observer would record the expiration dates of the new raft and make sure it is configured correctly before deploying.

Life raft hydrostatic release configuration
If the vessel is equipped with a life raft that has a hydrostatic release mechanism it needs to be configured correctly in order to properly inflate in the event of an emergency. For reference, there is a picture on the back of the PTVSC that illustrates the correct configuration of the hydrostatic release.

Observers always have the right to refuse deployment on any vessel for safety related concerns. If this occurs because of issues not covered on the PTVSC, the observer will contact their Area Coordinator or Program Manager, fully document the situation in their field diary and mail it in with their next trip. In this case the observer would NOT complete the SDR procedures.

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7 This statement is addressed in the memo to provide guidance to observers if they encounter an unmarked hydrostatic release.
Figures:

Figure 1. NOAA COSPAS SARSAT registration decal. The decal indicates the registration expiration date, the EPIRB Unique Identification Number (UIN) and the EPIRB registration owner. Also shown: Manufacture’s UIN and EPIRB battery expiration date.
Figure 2. Examples of an older style of a Category I EPIRB. The hydrostatic release is located behind mounting bracket.

Figure 3. A Category II EPIRB. This type of EPIRB does not have a hydrostatic release and must be manually released and activated. Category II EPIRBs are only approved for vessels less than 36' or any vessel manufactured with inherently buoyant material.
Figure 4. Completing EPIRB section on PTVSC

Upper section completed only if all EPIRB expiration dates are good for the next 90 days (3 months)

Lower section completed if any of the EPIRB expiration dates will expire within 90 days. Record those dates

Figure 5. Completing the EVIC

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Figure 6. Float free raft in cradle (top) and float free raft with painter properly attached to weak link and then to cradle (bottom). Hydrostatic release not required.
Figure 7. Hard shell style survival craft. May be referred to as "pod" or "egg".
Figure 8 & 9. Rigid (top) and inflatable (bottom 2) buoyant apparatuses.