

MARINE SAFETY AND SECURITY MANAGEMENT SYSTEM**TIER I – POLICY****ASSESSMENT OF DEAD SHIP
TOWING OPERATIONS**

| Effective Date | Date of Revision |
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MARINE SAFETY AND SECURITY MANAGEMENT SYSTEM

TIER I – POLICY

ASSESSMENT OF DEAD SHIP TOWING OPERATIONS

1 Policy Objective

- 1.1 To provide guidance for assessing a dead ship towing operations prior to departure from a place in Canadian waters for the safety of life at sea and the protection of the marine environment.
- 1.2 To guide Marine Safety Inspectors (MSIs) and the towing Master on the roles and responsibilities during the preparation and executions of the dead ship's towing operations.

2 Policy Statement

- 2.1 The towing Master in charge of a dead ship's towing operation is recommended to share the overview of the process and agree on the reporting timelines and requirements of the operation with the Regional Transport Canada Marine Safety and Security (TC MSS) in advance.
- 2.2 For towing operation destined to a recycling facility, the towing Master is to provide regional TC MSS with a completed safety assessment checklist (form 85-0504) for review prior to the departure.
- 2.3 Regional TCMSS Marine Safety Inspector (MSI) is to review the completed checklist for Dead-ship towing Operation and verify its compliance. Taking into consideration the checklist is based on an international towing operation destined to a recycling facility, when a criterion cannot be practically met due to the voyage duration or others, an alternative mean meeting an equivalent level of safety or protection to the marine environment is to be agreed upon to the satisfaction of the MSI. The rationale for the alternative measure and its characteristics is to be included in the remarks section of the assessment checklist.
- 2.4 All foreign towing vessels engaged in dead ship towing operations are subject to a Port State Control Inspection, in accordance with the Policy on the Inspection of non-Canadian commercial vessels under the Port State Control Program.

- 2.5 For towing operation destined to a recycling facility (International or domestic), the MSI shall carry out an on-site inspection prior to departure to verify the overall condition of the tow including the securing arrangement (e.g. towline), the remaining oil/pollutant quantity, watertight/weathertight integrity, and the loose items/equipment securing. Additional on-site inspections may be performed when necessary to ascertain compliance.

3 Scope

- 3.1 This policy applies to a dead ship towing operation:
- departing or has stopped from a place in Canadian waters.
 - making an international or domestic voyage,
 - the vessel under tow is unmanned, Canadian or foreign registered, and,
 - the towing and towed vessel combined gross tonnage is 500 gross tonnage or more
- 3.2 Although this policy mainly applies to towing operation destined to a recycling facility, the MSI assigned to verify the conformity of a different towing operation (e.g. (un)manned vessel under tow on a voyage to a repair facility, vessel relocation), should consider criteria from this policy and the checklist for Dead ship towing Operation included in TIER II Procedure - Assessment of Dead Ships Towing Operation to verify compliance, taking into account the voyage specifications.

4 Authority

- 4.1 This policy is developed under the authority of the Marine Safety and Security Executive Committee and in accordance with the *Canada Shipping Act, 2001*.
- 4.2 MSIs are authorized under CSA 2001 sections 12 and 211, to board vessels, and carry out inspections to ensure compliance with relevant provisions.

5 Responsibility

- 5.1 The Director General, Marine Safety and Security is accountable for the implementation of this policy.
- 5.2 The Executive Director, Navigation Safety and Oversight Standards is the functional authority for the development, implementation, maintenance, and continuous improvement of this policy.
- 5.3 The Regional Directors are responsible for the implementation and promotion of this policy in their respective regions.
- 5.4 Comments or queries related to this policy and its application should be addressed to:
Manager, Navigation Safety and Radiocommunications
330 Sparks Street, Ottawa ON. K1A 0N8
tc.navradio.tc@tc.gc.ca.

6 Related Documents

- 6.1 IMO Marine Safety Committee - MSC/Circ. 884 - *Guidelines for Safe Ocean Towing*.
- 6.2 IMO MSC / Circ. 1175 - *Guidance on Shipboard Towing and Mooring Equipment*.
- 6.3 Transport Canada Marine Safety - TP 11960.
- 6.4 TIER II Procedure - *Assessment of Dead Ship Towing Operations to a Ship Recycling Facility* .
RDIMS # 10436791
- 6.5 TIER I Policy- *Inspection of non-Canadian commercial vessels under Port State Control Program*.
RDIMS # 17113727

7 Background

- 7.1 From the NGO Shipbreaking Platform, Annual List of Scrapped Ships, between 2012 and 2021, about 57 Canadian (or formerly owned) vessels of more than 500 GT have been sent overseas for recycling, with the majority being sent to Turkey and India. There have also been 11 ships recycled in Canada including ships that were registered and operated in Canada as well as Canadian-owned vessels that were registered in another country and operated outside of Canada. Most ships are sold to a recycler before they leave Canada and the ship's registration is transferred to another country prior to its final voyage.
- 7.2 Failures in dead ship towing operation incidents departing from Canadian waters on an international voyage have illustrated the need for additional oversight of such operations. (i.e., MV. Miner, MV. L. Orlova).

- 7.3 **Subsection 109 (1)** of the CSA, 2001 requires the Master of a vessel to take all reasonable steps to ensure the safety of the vessel and the protection of the marine environment.
- 7.4 **Subsection 222. (1) and 229. (1)** of the CSA, 2001, allows the MSI to take measures such as Detention of vessels and administrative penalties, when a person or a vessel committed a violation based on reasonable grounds.
- 7.5 A checklist (form 85-0504) is based on MSC/Circ.884 and applicable for all Dead Ship towing operations.
- 7.6 An inspection of Dead Ships/Towing vessels by MSIs for *Authorization for Clearance* will be charged inspection fees and applicable to non-Canadian vessels in accordance with section 17 (a) of "*Board of Steamship Inspection Scale of Fees*" (BSISF).

8 Date of Application

- 8.1 This policy came into force on March 16, 2015, and was reviewed on September 17, 2024.

9 Date for Review or Expiry

- 9.1 This policy shall be in effect until rescinded, or until superseded by Regulations.

10 RDIMS Reference

- 10.1 The English version of this document is saved in RDIMS under reference number 10436776.
- 10.2 The applied naming convention is PUBLICATION - TP-13585 - POLICY - *Assessment of Dead Ship Towing Operations*.
- 10.3 La version française du présent document est dans le SGDDI et porte le numéro de référence 10441807. La règle d'affectation des noms est PUBLICATION - TP 13585 - POLITIQUE - *Évaluation des opérations de remorquage de bâtiment privé d'énergie*.

11 Keywords

- IMO - *Guidelines for Safe Ocean Towing*.
- *Canada Shipping Act, 2001*
- Dead Ship
- Vessel Inspections
- Ship Safety Bulletin
- Towing Operation