



March 1, 2019

**CSI Notice to Clients 02-2019**

**SUBJECT: ADHERENCE TO USCG VRP/NTVRP SUBMISSION TIMELINES**

The USCG Vessel Response Plan Program desk is not expediting VRP/NTVRP submissions and are holding vessels to the stated 30-day submission requirement as noted in the regulations. In follow-up to our Advisory 07-2017, the continued increase of requests for expedited reviews has led them to take a more aggressive stance on the regulations. It is extremely important for all Ship Managers to be very aware of both the 30 and 60-day requirements due to the fact of the serious financial implications that can result from delays of entry into the US or other substantial delays related to potential berthing delays and penalties.

- New Plans must be submitted at least 60 days prior to the vessel operating in US Waters.
- Amendments to existing plans must be submitted at least 30 days in advance of the vessels operation in US waters.

Keep in mind that Plans and submissions must be complete when submitting to the USCG, including a legible capacity plan as well as required SMFF documentation. The USCG VRP Program desk will not accept revisions until all documents are submitted and in order in totality. The USCG will not start the 'review clock' until a complete package is in their hands.

The regulations continue to allow for a one-time waiver; however, a vessel is not guaranteed to receive a waiver if submitted. It is not an automatic process and we are observing increased scrutiny on the one-time waiver submissions. If the plan is not approved or a waiver is not granted, the ship will not be allowed to enter US waters.

Another important note is that the USCG will not entertain one-time waivers until the master submits the E-NOA. This means the sooner a ship can submit the E-NOA, the quicker a one-time waiver can be submitted to prevent any unnecessary delays.

In addition to the timelines for VRP/NTVRP submissions, the USCG COFR regulations state that all applications and proof of insurance must be submitted at least 21 days in advance of arrival for processing. Again, past practices have allowed for faster processing and we are seeing a more aggressive stance in keeping with the stated timelines.

Should you have any questions regarding the VRP submission requirements please do not hesitate to contact our office at [csi@compliancesystemsinc.com](mailto:csi@compliancesystemsinc.com) or +1 (912) 233-8181.