



December 24, 2020

**CSI Client Advisory 16-2020**

**SUBJECT: Federal Alternative Planning Criteria (APC) coverage while transiting the Western Alaska (WAK) Captain of the Port (COTP) Zone**

**Alternative Planning Criteria (APC)** is a federally approved program which allows companies to propose alternative pollution prevention measures in remote areas where US oil spill regulatory compliance measures are not feasible, such as Western Alaska (WAK) COTP Zone. Obtaining this coverage allows the vessel to carry the WAK endorsement on their respective Vessel Response Plan. A participating vessel is required to comply with the risk reduction procedures outlined by the APC as well as support the availability of oil spill response equipment throughout the WAK COTP Zone. This ensures compliance with oil spill planning requirements of OPA 90. As per APC requirements, each participating vessel shall have a copy of the U.S. Coast Guard APC approval letter and relevant APC Operating Procedures on board prior to operating in Alaska waters where this APC applies.

Vessels operating or transiting the WAK COTP Zone enroute to or from a US port are required to enroll with a provider for WAK APC coverage in order to fulfil federal requirements. *Vessels on an innocent passage not enroute to or from a US Port are not required to apply.* Vessels must provide 96-hour notice of transit of the COTP WAK Zone to [sectoranchoragearrivals@uscg.mil](mailto:sectoranchoragearrivals@uscg.mil) and additional notification may be needed to your respected provider to include the details of the vessel's transit intentions. This is in addition to the Advance Notice of Arrival requirements.

**All Ships bound to or coming from a US Port, not under an innocent passage, must avoid entering the 200NM Alaska EEZ without APC Coverage.** The USCG is actively monitoring vessel AIS data provided by the APC providers to verify compliance and will take enforcement actions on vessels not authorized to transit the WAK COTP Zone or those deviating from the APC operating procedures without notifying them in advance.

**Regardless, when Ship is under APC Coverage program or transiting on an innocent passage, there are areas to be avoided.** On January 1, 2016, the IMO Maritime Safety Committee per IMO SN.1/Circ.331 adopted five "Areas to Be Avoided" (ATBA) in the Aleutian Islands to reduce the risk of a marine casualty and resulting pollution. The coordinates of the ATBAs and diagram is attached to this Advisory for your convenience, and more detailed mapping is readily available online by APC providers.

**APC Providers:**

There are several APC providers available such as 1-Call Alaska, Alaska Chadux, and Alaska Maritime Prevention & Response Network (aka The Network). The latter two companies recently announced consolidation effective December 1, 2020. With the recent consolidation, coverage has been reduced to a flat rate and is good for unlimited number of transits over a 12-



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month period. Non-tank vessel rates have been reduced as well and are based on oil capacity in barrels.

This Client Advisory, along with previously issued CSI Advisories, can be retrieved from our website, [www.compliancesystemsinc.com](http://www.compliancesystemsinc.com). Should you have any questions regarding this advisory, please do not hesitate to contact our office at [csi@compliancesystemsinc.com](mailto:csi@compliancesystemsinc.com) or +1-912-233-8181.

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**4709(P)/15 UNITED STATES OF AMERICA — Alaska — Aleutian Islands — Area to be avoided.**

Source: International Maritime Organisation

1. The International Maritime Organization (IMO) has adopted proposals to establish Areas To Be Avoided (ATBA) off the coast of Alaska, which are to be implemented at 000 UTC on 1 January 2016.
2. In order to reduce the risk of a marine casualty, resulting pollution and damage to the environment, all ships 400 gross tonnage and upwards, solely in transit, should avoid these areas.  
East Area To Be Avoided, joining the following positions:

- (9) 55° 40' .94N 159° 32' .43W (shore)
- (10) 55° 22' .58N 158° 49' .19W
- (11) 54° 41' .38N 158° 31' .66W
- (12) 54° 21' .99N 159° 11' .54W
- (1) 54° 07' .94N 162° 19' .48W
- (2) 54° 22' .14N 164° 59' .57W
- (3) 54° 43' .51N 165° 09' .77W
- (4) 54° 59' .45N 165° 14' .74W
- (5) 55° 43' .20N 163° 38' .05W
- (6) 56° 08' .30N 162° 22' .14W
- (7) 56° 19' .83N 161° 04' .29W
- (8) 56° 04' .91N 160° 29' .04W (shore)

3. Unalaska Area To Be Avoided, joining the following positions:

- (13) 51° 41' .19N 170° 52' .93W
- (14) 51° 53' .22N 171° 32' .60W
- (15) 52° 41' .95N 171° 50' .08W
- (16) 53° 17' .64N 171° 50' .31W
- (17) 54° 09' .49N 169° 23' .53W
- (18) 54° 17' .62N 168° 11' .32W
- (19) 54° 21' .96N 165° 43' .77W
- (20) 54° 11' .15N 163° 41' .63W
- (21) 53° 40' .84N 163° 41' .67W
- (22) 53° 24' .39N 164° 07' .37W
- (23) 52° 46' .62N 165° 56' .33W
- (24) 51° 57' .40N 168° 57' .60W

4. and back to point (13)
5. Atka Area To Be Avoided, joining the following positions:

- (25) 50° 38' .55N 180° 00' .00E
- (26) 51° 11' .83N 179° 50' .46W
- (27) 52° 39' .35N 178° 39' .78W
- (28) 53° 13' .18N 173° 49' .18W
- (29) 53° 02' .71N 172° 51' .16W
- (30) 52° 41' .07N 171° 56' .15W
- (31) 51° 37' .86N 171° 34' .53W

- (32) 51° 15' .27N 172° 36' .40W
- (33) 50° 21' .63N 179° 24' .20W

- 6. and back to point (25)
- 7. Amchitka Area To Be Avoided, joining the following positions:

- (34) 51° 51' .50N 174° 47' .54E
- (35) 52° 15' .54N 174° 53' .24E
- (36) 52° 46' .63N 176° 15' .15E
- (37) 52° 57' .86N 177° 37' .91E
- (38) 52° 48' .39N 180° 00' .00E
- (39) 52° 36' .31N 179° 22' .09W
- (40) 51° 32' .27N 179° 41' .19W
- (41) 50° 33' .65N 179° 33' .12E
- (42) 50° 44' .11N 178° 10' .33E
- (43) 51° 21' .00N 175° 59' .57E

- 8. and back to point (34)
- 9. West Area To Be Avoided, joining the following positions:

- (44) 53° 40' .90N 171° 50' .53E
- (45) 53° 49' .20N 172° 29' .47E
- (46) 53° 47' .85N 173° 25' .48E
- (47) 53° 24' .41N 174° 54' .79E
- (48) 53° 07' .49N 175° 18' .74E
- (49) 52° 19' .54N 174° 51' .62E
- (50) 52° 08' .23N 174° 21' .75E
- (51) 51° 40' .59N 172° 45' .27E
- (52) 52° 20' .90N 171° 29' .34E
- (53) 52° 40' .53N 171° 10' .34E
- (54) 53° 00' .92N 171° 06' .20E
- (55) 53° 23' .69N 171° 19' .71E

- 10. and back to point (44)
- 11. The Areas To Be Avoided are shown in the accompanying diagram.
- 12. Details of these changes will be included in New Editions of the affected charts or in Notices to Mariners.  
(All positions are referred to NAD83 DATUM)

**Charts affected — 1454 — 4522 — 4805 — 4810 (INT 810) — 4813 (INT 813) — 4969 — 4976 — 4977 — 4978**  
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