



**COLONIAL COMPLIANCE SYSTEMS, INC.**  
MARITIME REGULATORY CONSULTANTS

October 20, 2018  
NTC 09-2018

**CSI Notice to Clients 09-2018**

**SUBJECT: UPDATE TO REMOTE ASSESSMENT AND CONSULTATION EXERCISE FOR VESSELS**

The U.S. Coast Guard recently released the 2016.1 National Preparedness for Response Exercise Program (NPREP) Guidelines. These new NPREP guidelines will replace the existing guidelines dated June 2016. Chapter 7 of your Vessel Response Plan (VRP) contains these guidelines as a baseline for the drills and exercises which need to be conducted by vessels and shoreside in order to be in compliance with the OPA 90 VRP regulations. The only change plan holders need to be aware of is the change/reduction in frequency to the Remote Assessment and Consultation (RAC) Exercise. Under the previous NPREP Guidelines this was an annual exercise to be conducted by each vessel covered in the VRP when trading to the United States. As of October 2, 2018, vessels are no longer required to conduct the RAC Exercise annually. The RAC Exercise is now only required to be conducted triennially by each plan holder when their vessels are operating in U.S. waters, including the Exclusive Economic Zone (EEZ). If your Company has a number of vessels covered under one fleet VRP, your Company is considered the 'plan holder' and is responsible for conducting the RAC Exercise at least once every three years. In conjunction with this change, plan holders are urged to make random selections when determining which vessel, under each fleet VRP performs a RAC Exercise.

In an effort to complete the current triennial cycle, CSI is suggesting that we remain with the annual RAC exercise guidelines until 31 December 2018 to ensure we have met the necessary past requirements. Starting January 1, 2019, we will start the new triennial cycle and the new RAC requirements should be implemented. CSI will revise Chapter 7 of your VRP in due course to reflect this change.

The new NPREP 2016.1 Guidelines are available at:

[https://homeport.uscg.mil/Lists/Content/Attachments/30271/PREP%20Guidelines%202016\\_1\(2OCT18\).pdf](https://homeport.uscg.mil/Lists/Content/Attachments/30271/PREP%20Guidelines%202016_1(2OCT18).pdf)

Please pass the above to all interested parties and covered vessels.

If you should have any questions, please direct them to [csi@compliancesystemsinc.com](mailto:csi@compliancesystemsinc.com).

For a full list of our current and past advisories and newsletters, please visit <http://www.compliancesystemsinc.com/>