

Towing Vessel Pilotage & Route Requirements

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Inspected Coastwise ¹ Seagoing or Great Lakes Tank Barge(s) totaling more than 10,000 GRT	Inspected Coastwise ¹ Seagoing or Great Lakes Tank Barge(s) totaling 10,000 GRT or less	Inspected Coastwise ¹ Seagoing or Great Lakes Vessels of 1,600 GRT or less (including towing vessels)	Inspected Inland Vessels of 1,600 GRT or less (in- cluding towing vessels) & Inspected Inland ² Tank Barges
A CG-licensed first class pilot ³ is required, as per 46 CFR § 15.812(b)(1).	Towing vessel deck officers ³ may “ serve as pilot ” if they meet the requirements specified in 46 CFR § 15.812(b)(3).	Towing vessel deck officers ³ may “ serve as pilot ” if they meet the requirements specified in 46 CFR § 15.812(b)(2).	No pilotage requirements.

The table above indicates which type of pilot is needed for a given coastwise or inland voyage, based upon the size and type of the barge(s) or vessel(s)⁴ in tow and the service route endorsement on their *Certificate of Documentation*. The 3rd column applies to light tugs and tugs towing the following types of vessels: inspected vessels of 1,600 GRT or less, uninspected vessels (including uninspected barges), and dredges.

It’s important to remember the following: even light tugs (tugs without a tow) **must** be under the direction and control of either a **first class pilot** or a deck officer with authority to “**act as pilot**” when underway in designated pilotage waters⁵, non-designated pilotage waters⁶, or the navigable waters⁷ of the U.S. if their *Certificate of Documentation* (COD) is endorsed for *Coastwise* or *Great Lakes* service. This is because **46 CFR §§ 15.812(a)(1)(3)** requires coastwise seagoing and Great Lakes vessels that are propelled by machinery and subject to inspection under **46 U.S.C. Chapter 33** to do so. Towing vessels were designated by Congress in 2004 to be brought under inspection by the U.S. Coast Guard and, although this has yet to be accomplished, are listed at **46 USC § 3301(15)** as “**subject to inspection**”, thereby making the pilotage regulations applicable. Any towing vessel or tank barge whose COD is endorsed for *Inland* service is not subject to pilotage requirements of any kind. The general definition of pilotage waters, as per **46 CFR § 15.301**, is “*the navigable waters of the United States, including all inland waters and offshore waters to a distance of three nautical miles from the baseline from which the Territorial Sea is measured.*”

Another important point: any tug or tow engaged in **foreign trade** (sailing on a *Registry* endorsement) is subject to **state pilotage** regulations. Translation: you will need a **state** pilot when departing and re-entering any U.S. ports **whenever** you're sailing on a *Registry* endorsement, **regardless** of whether or not you're a first class pilot or have authority to "act as pilot" on that route.

In addition to having pilotage, officer's licenses must be endorsed for the particular route they're operating on. Licenses are issued with the following route endorsements in descending order of precedence: *Oceans*, *Near Coastal*, *Great Lakes-Inland*, and *Western Rivers*. In general, you must be endorsed for the route or routes you're operating on and a given route endorsement also gives you lesser-included authority for the subordinate routes below it, if any. However, *Western Rivers* is a "stand-alone" route endorsement that is **not** subordinate to the others and therefore isn't included by the lesser-included authority provision. Regardless of what other route you may be endorsed for, including *Oceans*, you **must** have the *Western Rivers* endorsement to operate on them. As per **46 CFR § 10.104**, the definition of *Western Rivers* is the Mississippi River, its tributaries, South Pass, and Southwest Pass, to the navigational demarcation lines dividing the high seas from the harbors, rivers, and other inland waters of the United States, and the Port Allen-Morgan City Alternate Route, and that part of the Atchafalaya River above its junction with the Port Allen-Morgan City Alternate Route including the Old River and the Red River, and those waters specified in **33 CFR § 89.25** (Tennessee-Tombigbee Waterway, Tombigbee River, Black Warrior River, Alabama River, Coosa River, Mobile River above the Cochrane Bridge at St. Louis Point, Flint River, Chattahoochee River, and the Appalachicola River above its confluence with the Jackson River).

Notwithstanding the definition of *Western Rivers* given above, a limited but very important exception exists regarding the requirement to have a *Western Rivers* endorsement to operate towing vessels on that route: as per **46 CFR § 15.610(d)**, an officer with a route endorsement for *Inland*, *Great Lakes-Inland*, *Near Coastal* or *Oceans* **may** operate a towing vessel in the **pilotage waters** of the Lower Mississippi River (to Baton Rouge, La. or 234 AHP⁸) if they are a first class pilot or have authority to "act as pilot" on that route.

The table below shows the Coast Guard requirements to qualify for a license or endorsement, and to serve, as **first class pilot**, or for licensed deck officers to gain and maintain authority to "**act**" or "**serve as pilot**" aboard towing vessels. There is no license or endorsement to "act as pilot" available from the CG. As per **46 CFR § 15.812(d)**, it is a self-certification system wherein the individual mariner must maintain a record of the roundtrips made as an observer or trainee on each designated pilotage route and, if requested, be able to present it to the CG within a "reasonable period"⁹ as proof that they have said authority to "act" or "serve as pilot." It's not necessary to show

every trip you ever made on each route, just the minimum number required, keeping in mind the night round-trip and recency requirements as well.

The regulations don't specify exactly what form this record must take. You may keep a hand-written pilotage log book, a 3-ring binder full of individual trip sheets, or whatever the hell you like. In general, more detailed information is better than less. As per the Coast Guard's Marine Safety Manual Vol. III - Marine Industry Personnel, in Chapter 11 / Section B. / Part 4. **Round Trip Route Familiarization Requirement And Documentation For Pilotage**, "*Documentation concerning these round trips must include the date, route, time of day, and name and tonnage of the vessel on which the trips were made properly certified by the master or pilot.*"

First Class Pilot	"Acting As Pilot" of Inspected Coastwise Seagoing & Great Lakes Tank Barges ≤10,000 GRT	"Acting As Pilot" of Inspected Coastwise Seagoing & Great Lakes Vessels ≤1,600 GRT (including towing vessels)
Must be 21 years of age. ¹⁰	Must be 21 years of age. ¹¹	Must be 21 years of age. ¹²
Must complete 12-20 (for an original license) or 8-15 (for an endorsement) round trips over the pilotage route ¹³ , as determined by the OCMI. ¹⁴	Must complete 12 round trips over the pilotage route, including 3 during hours of darkness for authority to do night transits. ¹⁵	Must complete 4 round trips over the pilotage route, including 1 during hours of darkness for authority to do night transits. ¹⁶
Must have recency . ¹⁷	Must have recency . ¹⁸	Must have recency . ¹⁹
No towing vessel experience required.	Must have at least 6 months of service aboard towing vessels engaged in towing activities. ²⁰	No towing vessel experience required.
Must have an annual physical examination. ²¹	Must have an annual physical examination. ²²	No annual physical examination requirement.

Note 1: Coastwise voyages require that the vessel be endorsed for that service on its *Certificate of Documentation*, and involve the carriage of passengers or cargo between U.S. ports or within the U.S. Exclusive Economic Zone (within 200 N.M. of the baseline).

Note 2: The *Certificate of Documentation* would be endorsed for either *Lakes, Bays & Sounds* or *Rivers*.

Note 3: A notable East Coast local exception: state pilots are **always** required when entering New Hampshire's Piscataqua River for the ports of Portsmouth and Newington, N.H., and Kittery, Me.

Note 4: Barges are technically vessels, too, but belong to the subset known as non-self-propelled vessels.

Note 5: Designated areas of pilotage waters are those waters/routes for which a license or endorsement as first class pilot may be obtained, as specifically designated by the local Coast Guard *Officer in Charge, Marine Inspection* (OCMI) for that sector.

Note 6: Non-designated areas of pilotage waters are those waters between the three mile line and the start of traditional pilotage routes.

Note 7: Navigable waters are defined as the territorial seas and the internal waters of the United States, as per 33 CFR § 2.36(a).

Note 8: Distances on the Mississippi River are measured in U.S. statute miles (which are approximately 0.87 of a nautical mile). The **Head of Passes** is the datum point from which all mileage measurements start, so mileages are commonly referred to as “*above the Head of Passes*”, or **AHP**. Thus, Baton Rouge is 234 AHP.

Note 9: A “*reasonable period*” is mentioned, but not defined, within the applicable regulations in 46 CFR § 15.812(d).

Note 10: As per 46 CFR § 15.812(b)(3)(i).

Note 11: As per 46 CFR § 15.812(b)(3)(i).

Note 12: As per 46 CFR § 15.812(b)(2)(i).

Note 13: As per 46 CFR §§ 10.705(b)(c).

Note 14: OCMI = Officer in Charge, Marine Inspection.

Note 15: As per 46 CFR § 15.812(b)(3)(v).

Note 16: As per 46 CFR § 15.812(b)(2)(iii).

Note 17: For an original license or endorsement as First Class Pilot an applicant must have **1 round trip** over the route within the **6 months** immediately preceding the date of application, as per 46 CFR § 10.705(e). License / endorsement renewal thereafter requires **1 round trip** over the route within the previous **5 years**.

Note 18: **1 round trip** over the route within the last **5 years**., as per 46 CFR § 15.812(b)(3)(ii) and 46 CFR § 10.713.

Note 19: **1 round trip** over the route within the last **5 years**., as per 46 CFR § 15.812(b)(2)(ii) and 46 CFR § 10.713.

Note 20: As per 46 CFR § 15.812(b)(3)(iv).

Note 21: As per 46 CFR § 10.709.

Note 22: As per 46 CFR § 15.812(b)(3)(iii) and 46 CFR § 10.709. However, as per 46 CFR § 709(a), no annual physical exam is required for individuals serving as pilot for tank barges of less than 1,600 GRT.