



Marine Safety Information Bulletin

Commander
United States Coast Guard
Sector Columbia River
2185 S.E. 12th Place
Warrenton, OR 97145

MSIB Number: 01-22
Date: September 14, 2022
Contact: Port State Control Office
Phone: (503) 240-9339
E-Mail: PSC-PDX@uscg.mil

Reduced Visibility from the Navigational Bridge Due to Overloading of Wind Turbine Parts

The purpose of this Marine Safety Information Bulletin (MSIB) is to update mariners and the maritime industry of the recent upward trend in the number of break-bulk and retrofitted bulk carriers carrying wind turbine parts stowed in ways to limit visibility from the navigation bridge. Specifically, the worst scenarios cases have stacked turbine blades four levels high, which increases the forward blind spot to 2.5 miles or more. This is in violation of both domestic regulation and international convention, specifically:

33 C.F.R. § 164.15:

“The view of the sea surface must not be obscured by more than the lesser of two ship lengths or 500 meters (1640 feet) from dead ahead to 10 degrees on either side of the vessel. Within this arc of visibility any blind sector caused by cargo, cargo gear, or other permanent obstruction must not exceed 5 degrees.”

Furthermore, these regulations are mirrored by the International Requirements of SOLAS V/22, which states:

“The view of the sea surface from the conning position shall not be obscured by more than two ship lengths, or 500m, whichever is less, forward of the bow to 10 degrees on either side under all conditions of draught, trim and deck cargo.”

“No blind sector, caused by cargo, cargo gear or other obstructions outside of the wheelhouse forward of the beam which obstructs the view of the sea surface as seen from the conning position, shall exceed 10°. The total arc of blind sectors shall not exceed 20°. The clear sectors between blind sectors shall be at least 5°. However, in the view described in .1, each individual blind sector shall not exceed 5°.”



Over the last 3 months, multiple vessels have come into Sector Columbia River under violation of the above regulations, which have each provided significant challenges to ensure the safety of the Navigable waters of the United States, and that of all waterway users. While ships may be able to structurally support increased loading, doing so in such a way that obscures vision from the navigation bridge comes at an increased risk of collision.

To mitigate the increased risk of collision, the vessel operators have obtained Flag State Dispensations allowing the vessel to sail with additional requirements. For example, requiring the vessel to maintain a Closed Circuit Television (CCTV) feed that grants the master visibility of the obscured sectors. The use of CCTV systems to address substandard navigation bridge visibility is covered under the unified interpretation of Regulation 22 in MSC.1/Circ.1350/Rev.1; however, the circular addresses the use of CCTVs to correct visibility of the sides of the vessel from the bridge wing ONLY, and makes no mention or concession of their use to correct forward visibility.

Furthermore, Dispensations do not address the unique constraints imposed by the Columbia River system specifically; i.e. a long, narrow, winding waterway frequently shared by both commercial and recreational users simultaneously.

To better prepare our waterways stakeholders, Marine Safety Unit Portland has begun taking Enhanced Port State Control screening measures to identify vessels that declare windmill blades / components as cargo, due to the possibility of impact to bridge visibility.

In addition, we have communicated with the Columbia River Steamship Operators' Association (CRSOA), Pilots and shipping Agents of these increased requirements to ensure that we are in alignment.

The Coast Guard strongly recommends that vessel owners, operators, and maritime stakeholders:

- Strongly consider the impacts to safe navigation of loading cargo in such a way that impacts visibility from the bridge
- Proactively notify Port State Authorities and local Pilotage Agencies of the departure and arrival ports if bridge visibility is impacted, before the vessel sets sail
- Provide additional crewmembers in order to combat fatigue and augment enhanced / doubled lookout watches, especially when transiting through areas of high traffic density
- Ensure that any equipment provided to increase visibility works as intended, accounting for sea conditions, camera quality, and screen size
- Identify and contract with possible commercial or governmental vessels that may be able to serve as an escorts to clear the waterway ahead of the vessel
- Employ risk-analysis and mitigation strategies recognizing the concerns of such condition
- Adjust loading configurations to comply with the International and US requirements for visibility from the bridge

Should you have any questions or concerns regarding this matter, please do not hesitate to contact our Port State Control branch at (503) 240-9339 or PSC-PDX@uscg.mil.

Sincerely,



J. W. NOGGLE
Captain, U.S. Coast Guard
Alternate Captain of the Port
Sector Columbia River