



GUIDANCE NOTICE

Domestic Commercial Vessel Towing Operations

The purpose of this guidance notice is to assist owners and masters of domestic commercial vessels involved in towing operations, in complying with their general safety duties under the National Law. It should not however be read as a definitive or binding statement about compliance with these duties.

Part 3 of the *Marine Safety (Domestic Commercial Vessel) National Law Act 2012* (the National Law) contains important obligations for owners and masters of all domestic commercial vessels. In particular, owners and masters must ensure the safety of crew, vessels, and the operation of the vessel. The carriage and condition of marine safety equipment related to the vessel must also be considered.

The National Law details offences relating to failures of owners and masters to implement, maintain and comply with a safety management system that ensures that the crew, vessel and the operation of the vessel are, so far as reasonably practicable, safe. Information, instruction, training or supervision is to be provided to people on board the vessel to ensure their safety.

For masters, the National Law also creates obligations to take reasonable care for his or her own safety and that of persons who may be affected by his or her acts or omissions. Towing results in physical and operational changes to most normal vessel operations and requires careful consideration.

Prior to any towing operations, risk assessments must be conducted in accordance with Part E of the National Standard for Commercial Vessels. AMSA recommends they be informed by competent experts in order to ensure all aspects of the tow are considered and appropriate mitigation identified and implemented. The National Regulator stresses the importance of the risk assessment process.

Risk assessment resources for towing

The International Maritime Organisation “Guidelines for Safe Ocean Towing” MSC/Circ.884 details the minimum recommendations for the organisation, planning and execution of ocean towage and the design of associated equipment.

When assessing the suitability of a tow, the vessel owner and master are encouraged to refer to the above circular and the guidelines found within the [US Navy Towing Manual \(SL 740-AA-MAN-010\)](#).

Although the resources provided above are helpful, they do not replace the use of experts in this area. Surveyors, Naval Architects or other experts, should be consulted if this expertise is not available within the towing operation.

Other factors that AMSA encourages operators to consider include:

- suitability of the towing vessel;
- manning requirements and training of towing crew;
- local waterways management requirements;
- insurance;
- weather and tow location
- any additional equipment that may be required, and
- appropriate record keeping of all tow related documentation (e.g. survey reports, stability calculations etc).

The above considerations are not exhaustive and each operator should consider the specific tow and their operation in its entirety when undertaking a risk assessment.

Records

All documentation of the operation is to be retained in accordance with the National Standard for Commercial Vessels Part E.