Regulation of U.S. Sail Training Vessels

Virtually all vessels are subject to some form of regulation by the national maritime authority of their “flag state”—the country in which they are registered. In the United States, these regulations are written and enforced by the United States Coast Guard, pursuant to laws enacted by Congress. Under the Safety of Life at Sea (SOLAS) Convention, administered by the International Maritime Organization (IMO), vessels of any nation signatory to the convention and over a certain size, or carrying more than 12 passengers and operating internationally, must also comply with the requirements of the Convention with regard to construction, safety equipment, Manning, crew training, etc. Compliance is documented in a “SOLAS Certificate” issued by the ship’s national maritime authority.

US-registered vessels listed in this directory will generally fall into one of the following categories (defined in the Code of Federal regulations Title 46):

- **Sailing School Vessel (Subchapter R)**
- **Uninspected Passenger Vessel (Subchapter C)**
- **Small Passenger Vessel (Subchapter T)**
- **Moored Attraction Vessel (a restricted, dockside-only type of passenger vessel).**

For each category of inspected vessel there is a comprehensive set of regulatory requirements governing construction and arrangement, watertight integrity and stability, lifesaving and firefighting equipment, machinery and electrical systems, vessel control and equipment, and operations.

With the exception of Uninspected Vessels, all categories of US-registered vessel are subject to Coast Guard inspection on an annual basis and at regular intervals when hauled at drydock. Upon satisfactory completion of the inspection, a Certificate of Inspection (COI) is issued, and must be permanently displayed on board the vessel. The COI spells out what waters the vessel may operate in (its authorized route), how many passengers or sailing school students may be carried, how many crew must be carried and what qualifications the master and crew must have, the requirement for and location of lifesaving and firefighting equipment, when the next drydock exam is required, and so forth. The type of COI to be issued to inspected vessels is determined by both the size and construction of the vessel and the operating intentions of the operator. Some vessels carry dual certification (for example: Small Passenger Vessel and Sailing School Vessel).

The Coast Guard also prescribes the qualifications for the officers and crew of inspected vessels, and requires both that they have certain minimum levels of experience and training, and that they be examined and issued licenses or documents before they can lawfully serve on board. The following page gives a brief description of the various types of certifications governing the operation of US-flagged vessels.

Sailing School Vessels, or “SSV’s” (Subchapter R): An SSV is a vessel of less than 500 gross tons, carrying six or more sailing school students or instructors, principally propelled by sail, and operated by a nonprofit educational organization exclusively for the purpose of sailing instruction. The SSV regulations take into account that the participants are not passengers but instead will be involved in educational activities or in the operation of the vessel. SSV’s are required to meet full certification criteria with regard to the vessel’s design, construction, layout, stability, and systems, and are subject to regular USCG inspection of the ship, all onboard equipment, and operations. Licensed Captains are required and minimum crew requirements are specified by the USCG. Routes and service areas are specified.
Passenger Vessels are certified according to size and number of passengers carried. As distinct from SSV’s, the regulations for Passenger Vessels do not contemplate that participants are actively engaged in the vessel’s operation, though they may be.

Uninspected Vessels or “UPV’s” (Subchapter C): UPV’s are not required to be inspected by the Coast Guard, but they must comply with minimal federal standards for safety, navigation, pollution prevention.

UPV’s under 100 gross tons are allowed to carry up to 6 passengers. Licensed Captains are required, as are minimum life preservers/lifesaving and fire extinguishing equipment. Minimum crew requirements are not specified by the USCG.

UPV’s of 100 gross tons or greater are allowed to carry up to 12 passengers. Licensed Captains are required, as are minimum lifepreservers/lifesaving and fire extinguishing equipment.

UPV’s of 200 gross tons or greater are allowed to carry up to 12 passengers. Crew are required to hold merchant mariners documents, 50% of which must be rated at least Able Seaman, and be manned similarly to vessels inspected under Subchapter T. A voyage plan must be communicated ashore for Great Lakes, Oceans or International Voyages.

Small Passenger Vessels, or “SPV’s” (Subchapter T): Small passenger vessels regulated under Subchapter T are less than 100 gross tons and carry more than 6 but not more than 150 passengers, or have overnight accommodations for 49 or less passengers. SPV’s are required to meet full certification criteria with regard to the vessel’s design, construction, layout, stability, and systems, and are subject to regular USCG inspection of the ship, all onboard equipment, and operations. Licensed Captains are required and minimum crew requirements are specified by the USCG. Routes and service areas are specified.

Moored Passenger/Attraction Vessels: Attraction Vessels are put on public display or used as a platform for a public exhibit, and carry passengers only while temporarily moored to a dock. By charging admission or accepting donations or other valuable consideration, Attraction Vessels are subject to US inspection laws as passenger or small passenger vessels, and an Attraction Vessel COI is required whenever a vessel is open to public boarding or conducts dockside programs. The vessel may or may not be concurrently certified for underway passenger operation under one or more of the above subchapters, but the Attraction Vessel COI certifies its safety for dockside programs and visitation only.

Non-US Flag Vessels: These vessels are subject to inspection regulations established by the country in which they are registered.

For more information about US regulations, contact the United States Coast Guard or the Government Printing Office for the above listed sections of the Code of Federal Regulations.

For inspection criteria pertaining to non-US flag vessels, contact the vessel’s home office for guidance to their national authorities.