



USCG Office of Commercial Vessel Compliance (CG-CVC)  
Mission Management System (MMS) Work Instruction (WI)



Category	Domestic Inspection Program				
Title	Determinations for a Vessel’s Keel Laid Date or Similar Stage of Construction for U.S. Flag Vessels				
Serial	CVC-WI-015(2)	Orig. Date	27AUG19	Rev. Date	20Sept19
Disclaimer:	<p>This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is not intended to nor does it impose legally-binding requirements on any part. It represents the Coast Guard’s current thinking on this topic and may assist industry, mariners, the public, and the Coast Guard, as well as other federal and state regulators, in applying statutory and regulatory requirements. You can use an alternative approach for complying with these requirements if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach you may contact the Coast Guard Office of Commercial Vessel Compliance (CG-CVC) at <a href="mailto:CGCVC@uscg.mil">CGCVC@uscg.mil</a> who is responsible for implementing this guidance.</p>				

- A. Purpose. This work instruction sets forth the interpretations of when a vessel’s keel is considered to be laid or the vessel is at a similar stage of construction, and provides guidelines for Officers in Charge, Marine Inspection (OCMIs) to determine what may be accepted for the purpose of establishing a vessel’s keel laid date for U.S. flag vessels.
- B. Action. OCMIs, maritime industry, and Recognized Organizations (ROs) should refer to this work instruction when determining if a vessel’s keel laid date or similar stage of construction has been adequately established in accordance with the requirements of a vessel’s respective inspection subchapter(s).
- C. Background. Regulatory applicability may rely on a vessel’s keel laid date or a similar stage of construction to establish when a vessel should be considered *new* or *existing, built, or constructed*.<sup>1</sup> The intent of establishing an accurate date to mark the beginning of a construction project ensures that new requirements are applied to vessels while phasing out vessels built to older standards. Simply placing an undefined structural member in a shipyard without construction plans or the intent to build a specific vessel is not in keeping with the spirit of advancing safer vessel standards. Similarly, once a keel laid date or a similar stage of construction has been established, there should be progress towards completion.
- D. Discussion.
  1. The terms *keel laying date, constructed, and new vessel* are found throughout the U.S. Code and Code of Federal Regulations (CFRs) to establish a start date for applicable laws and regulations. CG-CVC interprets that a vessel’s keel laying date is established when the keel in question is a structure adequate for serving as a keel for a specific identifiable vessel.
  2. Some vessels may not have a traditional keel, or construction techniques allow for the fabrication of sections of a vessel before the actual keel is laid. If permitted by statute or regulation,

<sup>1</sup>Regulatory applicability may also be based on major conversions to the vessel; however, this WI does not address major conversions.

separate criteria using an absolute or percentage mass requirement may be used as an equivalent to the keel laying date.

3. This work instruction is not all encompassing. OCMI's, owners, and builders are reminded to review the applicable subchapters to ensure compliance with any additional requirements surrounding vessel construction.

E. Instruction. The following criteria may be used to determine the date when a keel is considered to be laid or is at a similar stage of construction.

1. Keel laid to meet the requirements for a *new* or *existing vessel*, or the terms *built* or *constructed*, as outlined in each respective inspection subchapter. The keel should be a structure adequate for serving as a primary centerline strength member running longitudinally stem to stern along the bottom of a ship around which the hull of the vessel will be built. The keel should be accompanied by verifiably dated structural drawings/plans for a specific vessel identifiable with the keel in question and should not specify a keel length other than the length of the keel that has been laid. Attestation from the shipyard or surveyor noting the keel laying date should be made available to the Marine Inspector.
2. A prefabricated section or first module of a specific vessel's hull built that is comprised of 50 metric tons or at least one percent of the estimated mass of all structural material, whichever is less, to meet the similar stage of construction requirement under *built* or *constructed*. The section or modules should be accompanied by verifiably dated structural drawings/plans for a specific vessel. Attestation from the shipyard or surveyor noting the date the vessel meets the similar stage of construction should be made available to the Marine Inspector.
3. The OCMI may provide the shipyard with the keel laid date determination via correspondence.
4. If the vessel's structural drawings/plans change at a later date for the purposes of building a different vessel than originally intended, the OCMI may determine that variance is significant enough to reset the keel laid date.
5. Once the keel laid date or a similar stage of construction is established, progressive construction on the identifiable vessel should continue until completion. The time taken to complete construction should be commensurate with typical construction timelines for vessels of similar size, type, and complexity. The OCMI should take into account construction delays that may be associated with factors outside the control of the builder.
6. For vessels that are unable to provide objective evidence of a keel laid date or a similar stage of construction, the OCMI should apply current regulations and requirements to the vessel in so far as reasonable and practical.

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By direction