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U.S. Department of Homeland Security

MARINE SAFETY ALERT

Inspections & Compliance Directorate

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Safety Alert 15-26

GUIDANCE AND SAFETY CONSIDERATIONS ON THE HAZARDS OF RETRACTABLE PILOT HOUSES ON TOWING VESSELS

In 2019, an investigation of a marine casualty aboard a towing vessel led to the publication of [Marine Safety Alert 13-19](#) titled *An Important Safety Consideration – Hazards of Retractable Pilot Houses on Towboats*. Since its release, further clarification has been necessary regarding safety regulations to prevent similar future incidents, specifically as it applies to Title 46 Code of Federal Regulations (CFR) Subchapter M – *Towing Vessels*.

The original Safety Alert stated: “Retractable pilothouses are not specifically addressed in 46 CFR Subchapter M, however 46 CFR § 140.505(b) states: ‘All vessel equipment is required to be used in accordance with manufacturer’s recommended practice and in a manner that minimizes risk of injury or death.’ Failure to comply with either of these requirements, manufacturer’s recommendations or in a manner to minimize risk of injury, is a failure to comply with the requirement.”

The U.S. Coast Guard (USCG) would like to call attention to an additional requirement that is applicable to safety on towing vessels with retractable pilot houses. Specifically, 46 CFR § 144.820 – *Guards in dangerous places*, provides that “[a]n exposed hazard such as gears and rotating machinery must be protected by a cover, guard, or rail.” This requirement is intended to reduce the risk of injury to crew members by ensuring that exposed hazards are appropriately guarded.

The reference to “gears and rotating machinery” are illustrative examples and not an exhaustive list. As technology advances, so must the scope of what this regulation encompasses. Focusing solely on rotational hazards in the engine room excludes critical dangers originating from other mechanical movements, such as lifting, actuation, or reciprocating motions from possible sources including deck towing gear or retractable pilot houses. These other mechanical movements also pose severe, life-threatening risks including shearing, pinching, compression, and crushing. Title 46 CFR § 144.820 encompasses all mechanical hazards, for inspected towing vessels including the vertical movement, crushing, and pinching hazards posed by retractable pilot houses. Additionally, inspected towing vessels enrolled in the Towing Safety Management System (TSMS) option must complete a survey to verify that appropriate guards and rails are in place for the hull structure and appurtenances, as required by 46 CFR § 137.220(b)(5). The survey must also confirm that any observed unsafe practices, fire hazards, or other hazardous conditions are corrected, and that all required guards and protective devices are in satisfactory condition, consistent with 46 CFR § 137.220(l)(1).

To satisfy the requirements of 46 CFR § 144.820 and § 137.220, and prevent future casualties, the USCG **strongly recommends** that towing vessel owners, managing operators, and Masters utilizing retractable pilot houses implement the following safety measures:

- **Install Physical Barriers:** Establish physical barriers (e.g., guardrails, chains, or localized enclosures) in the immediate vicinity of the retractable pilot house danger zone to serve as a means of controlling access. These barriers should limit unauthorized or inadvertent access to the hazardous area beneath or adjacent to the moving superstructure.
- **Integrate Warning Systems:** Ensure the installation of clear markings (such as perimeter hazard tape or painted boundaries) and the integration of visual and audible alarms. These alarms should activate automatically whenever the pilot house is in motion, including during the deployment of rapid "emergency down" features, to warn personnel in the vicinity to stand clear.
- **Establish Documented Company Policies:** Develop and implement strict written policies within the vessel's TSMS or Operations Manual. These policies should govern safe retractable pilot house operations and explicitly define the limited, high-consequence scenarios in which the emergency drop feature may be utilized.
- **Standardize Crew Training:** Conduct Safety Orientation prior to getting underway for the first time on the vessel as specified by 46 CFR § 140.410 and document the training sessions to ensure all crew members understand the crush hazards of moving superstructures, respect marked danger zones and are familiar with the company's safe operating procedures. Annual refresher training is to be administered and documented as specified by 46 CFR § 140.515.

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