



Pilot Cards

By Commercial Vessel Compliance (CG-CVC), / Published July 28, 2023

IMO Greenhouse Gas Strategy and recent MARPOL Annex VI requirements for EEXI and CII are requiring the shipping industry to make changes to their vessels. Some options include installing Engine Power Limiters (EPLs) or installing governors to limit the power of the vessel. An EPL is an overridable system that limits the engine's power output, while a governor is a fixed (non-overridable) system that permanently changes the power output characteristics of the vessel. While both EPLs and governors limit vessel power, the use of either of these systems does not limit the effectiveness of the vessel to operate in accordance with Navigation Rules (COLREGS), including Safe Speed requirements. Vessel operators should not be required to circumvent emissions control equipment or override EPLs as a basis for entering or exiting a U.S. waterway. The use of power reserve, for EPL equipped vessels, is only allowed for the purpose of securing the safety of the ship or saving life at sea, consistent with regulation 3.1 of MARPOL Annex VI (e.g., operating in adverse weather and ice infested waters, participation in search and rescue operations, avoidance of pirates and engine maintenance).

Vessels that have installed power limiting devices (EPLs or permanent governors) should ensure that Pilot Cards are updated with the maximum available power as allowed by the EPL or governor installed.

IMO Resolution A.601 (15) provides the Regulatory guidance for vessels to have a Pilot Card to describe the current condition of the vessel regarding its loaded condition, propulsion and maneuvering characteristics. Pilots use this card to assist in navigating the vessel in and out of port. Title 33, Code of Federal Regulations, Part 164.11(k) requires that vessels provide maneuvering information to pilots, and NVIC 7-89 provides specific reference to IMO Resolution A.601 (15). Section 2.3 of the resolution states in part, "The maneuvering information should be amended after modification or conversion of the ship which may alter its maneuvering characteristics or extreme dimensions."

Questions concerning this blog post should be directed to CGCVC@uscg.mil.

