

CAMM Press Release

Merchant Mariner Medical Evaluation Program

Docket No. USCG–2013-0089

1 May 2013

The Council of American Master Mariners (CAMM) was founded in 1936 as a non-partisan professional organization of American Ship Masters. CAMM is pledged to serve no personal or private ambition or interest but to promote broad general policies for the benefit of the national interest and of maritime endeavors.

Since 2004, CAMM has taken official Positions on maritime issues of importance and concern to the Shipmaster and the maritime industry. In 2011, CAMM took a position against the current USCG Physical Guidelines for Merchant Mariners, as guidelines for compliance were unclear. At CAMM's 2013 Annual General Meeting, Position 2011-01: USCG Physical Guidelines for Merchant Mariners, was amended as follows:

SUPPORT the International Labor Organization, Maritime Labour Convention 2006 (ILO-MLC 2006), Regulation 1.2 – Medical Certificate.

Note of Clarification: Adoption of ILO-MLC 2006, Regulation 1.2 - Medical Certificate would oblige the USCG to remove the medical fitness requirements from the certificate of professional competency currently required in the Merchant Marine Credential (MMC). An independent two (2) year Medical Certificate would be added to the MMC. Said Medical Certificate would be in compliance with MLC 2006, Regulation 1.2.

The Council of American Master Mariners is responding to Docket Number USCG-2013-0089; notice and request for comments.

In their assessment of the National Maritime Center's (NMC) merchant mariner medical evaluation program, the USCG should concede that the present system has not provided the desired results. Members of the USCG Merchant Marine Personnel Advisory Committee (MERPAC) previously advised the USCG that a small staff of medical evaluators at the NMC could not effectively or efficiently monitor the medical condition of all U.S. Mariners. An evaluation based on exchanged paperwork between the mariner, their physician and the NMC has proved cumbersome and inept. An overhaul of the merchant mariner medical evaluation program is needed.

According to the Federal Register (Vol 78, No. 63, pg 19725),

Congress specifically asked the Coast Guard to include an analysis of how a system similar to the Federal Motor Carrier Safety Administration's (FMCSA) National Registry of Certified Medical Examiners program, and the Federal Aviation Administration's (FAA) Designated Aviation Medical Examiners program, could be applied by the Coast Guard in making medical fitness determinations for issuance of merchant mariners' documents.

The ILO-MLC 2006, Regulation 1.2 states that its purpose is “to ensure that all seafarers are medically fit to perform their duties at sea.” The ILO-MLC 2006, Standard A1.2 – Medical Certificate, follows the general concept currently used in the United States by the FMCSA and FAA in their medical evaluation programs/systems. Therefore, per CAMM’s Position 2011-01, (Amended 2013), CAMM strongly supports the adoption of ILO-MLC 2006 by the USCG. The implementation of ILO-MLC 2006, Regulation 1.2 would improve the MMC procedure by:

1. creating a separate medical certificate which would be independent of any certification of competency,
2. clarifying the medical standards and guidelines,
3. assuring that the medical certificate would genuinely reflect seafarers’ state of health in light of the duties they are to perform,
4. requiring that the medical certificate would be issued by a qualified medical practitioner recognized by the competent authority (USCG) and that said practitioner would have full professional independence in exercising their medical judgment, and
5. ensuring that U.S. Mariners are in compliance with international regulations.

Additionally, for uniformity of the MMC, the USCG could apply the international standard to U.S. domestic mariners.

Thank you for your attention,

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