


Gulf Coast Mariners Association



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LACK OF TRAINING FOR LICENSED OFFSHORE SUPPLY VESSEL (OSV) ENGINEERS

[Being a summary of remarks made to the International Transport Workers Federation (ITF) by the Gulf Coast Mariners Association in New Orleans, LA on April 11-12, 2000.]

BACKGROUND

During the 1970s, most offshore supply vessels were built to admeasure at less than 200 gross tons, operated as "uninspected vessels," and were not manned by Coast Guard-licensed engineers. Consequently, indoctrinating those who performed engineer duties was left to on-the-job training (OJT) rather than to formal instruction by qualified trainers. That situation persists today!

Nevertheless, during the 1970s and into the early 1980s, there existed formal training schools in both New Orleans⁽¹⁾ and Port Arthur⁽²⁾ where candidates from the Gulf area could obtain required training for existing engineer licenses when such licenses were required. Even the thought of licensing towing vessel engineers was nixed by an admittedly superficial Coast Guard study titled A Report to Congress Concerning the Need for Engineers on Uninspected Towing Vessels dated May 1973.

It appears that only a few vessel operating companies recognize the value of training an engineer when licensing is not also a legal requirement. So, in effect, the Coast Guard must hold part of the blame for the current lack of engineering training on commercial vessels less than 1,600 tons. It is a situation that cries for attention. [⁽¹⁾American Marine School. ⁽²⁾Captain Van.]

STUDIES AND REPORTS

The Newman Report (1973). In 1972, honoring a request by leaders of the mineral and oil industry to Senator Russell B. Long, the Commandant of the Coast Guard sent Captain C. T. Newman to study the licensing regime that governed the offshore oil industry and make recommendations for changes the industry believed were warranted. A number of changes were warranted and were made based upon the report. However, the concern for the status of engineers did not place prominently in the report because few engineers required licenses and because serious licensing problems needed to be resolved with existing deck licenses and examinations at the time.

Public Law 96-378 (1980). On October 6, 1980, Public Law 96-378 was enacted. It stated, in part, that "No offshore supply vessel may be navigated without a licensed deck officer and, if over two hundred gross tons, without a licensed engineer." As a direct result of this new law, the Coast Guard "grandfathered" existing engineers and issued those who fulfilled the requirements a temporary license without any formal training requirements.

As the grandfathering process progressed, the industry sank into a period of severe economic recession that lasted for almost ten years. At the time, the industry had all of the engineers it needed and saw no need to spend money to train new engineers during those years. Besides, in most cases, mariners were expected to obtain and/or upgrade their own licenses in order to advance in the industry. At the same time, the two private marine schools that had concentrated on training engineers in the Gulf area closed their doors during the mid-1980s.

Functional Job Analysis (1982). Just before the onset of the oilfield recession, the Coast Guard conducted a functional job analysis covering the transportation sector of the offshore oil industry and published a full report in January 1982. One of the most notable results of the report dealt with OSV engineers. The report stated in part: "Responsibilities appear to be misallocated in two positions. The engineer in many cases is burdened with more tasks than can be performed. This is especially true when his cargo transfer duties increase because of frequent, very short trips that typically entail more pumping duties. The mate on the other hand is underutilized. He serves very little time on watch while underway. Maintenance of the vessel is his main responsibility at the dock, but this is limited by the vessel's schedule. Unlike the engineer, the mate's work increases when the trips are longer and less frequent. Since most of the trips are short and frequent, there appears to be room for a shift in responsibilities or additional help for the engineer." The report correctly rejected transferring some of the mate's duties to the engineer. [EIA, p. 52].

The functional job report recommended: "Add an oiler to assist the chief engineer. We feel additional help for the chief engineer is necessary in light of the work day laws and from the task analysis..." [EIA, p. 57.]

UNDERMANNED ENGINEROOMS

While many of the recommendations of both the Newman Report (1973) and the Functional Job Analysis (1982) were implemented, others were not. Most notable is the fact that many OSVs still operate without adequate, permanently-assigned engineroom help in the form of an oiler. The sample manning scales in the Marine Safety Manual, Vol. III, Chapter 21 indicate that three designated duty engineers and three oilers are required on voyages of less than 600 miles. However, these figures are qualified as "variables." The term "variable" is explained as follows: "Number of engineering personnel dependent on level of automation. Refer to Chapter 25 and NVIC 1-78 for specific guidance."

NVIC 1-78 is titled Automation of Offshore Supply Vessels of 100 Gross Tons and Over. This NVIC gives a clear picture of what the OCMI must consider as far as installed equipment on each OSV is concerned before allowing that vessel to be considered for reduced engineer room manning based on its automated status.

Chapter 25. Key paragraphs in "Chapter 25" (dated May 27, 1999) as mentioned above relating to the Engine Department are as follows:

"Automation of the engine department is the most common method of reducing manning levels. A review of automated vessel experiences show varying degrees of reliability in engineering automation. Accordingly, manning reductions in the engine department shall be made only after a system has been operated for a sufficient period of time to demonstrate its reliability.

a. Reduction in Engineer Room Manning Requests. The Officer in Charge, Marine Inspection (OCMI) shall review and approve all requests for reductions in engineer room manning. The examination shall include a detailed analysis of the following: (1) the capabilities of the automated system; (2) the combination of the personnel, equipment, and systems necessary to ensure the safety of the vessel, personnel, and environment in all sailing conditions, (3) the ability of the crew to perform all evolutions including emergencies and during control or monitoring system failure; (4) a planned maintenance program with regular testing and inspection procedures; and (5) the automated system's demonstrated reliability during its initial trial period and its continued reliability. Critical consideration shall be given to the degree of vital system automation, status of automation approval by the Marine Safety Center (MSC) and status of testing required by 46 CFR 61.40. 46 CFR 62.50 provides additional details on the specific equipment and operational requirements for minimally attended or periodically unattended machinery arrangements. The OCMI shall consider all relevant information in determining a reduction in crew size to ensure there is no adverse effect on safety. Any follow-up requests for alteration of the vessel's manning shall be documented and reviewed in a similar manner. Commandant (G-MOC) shall be provided a copy of the final approval letter whenever a manning reduction is permitted."

Our Association does not understand how any Offshore Supply Vessel greater than 100 gross tons and in 24-hour service, no matter how automated, can be allowed by any Officer in Charge Marine Inspection to sail with only one licensed engineer and no other trained and licensed or certificated engineering personnel on board the vessel. As a practical matter, we expand this statement to include the hundreds of vessels that admeasure just less than 100 gross tons under the old tonnage laws to take advantage of distorted tonnage arrangements.

It is no wonder that companies operating their vessels so deficiently crewed have trouble recruiting and retaining decent engineer room personnel! We believe the mariners we represent are only protected when laws, regulations, and policies are enforced and carefully reviewed on a regular basis. The disturbing reports we have received from our mariners give us reason to believe this is not being done.

The requirement for licensed engineers in Public Law 96-378 (1980) created a greater distinction between deck and engineering departments than existed during the 1970s. Many times in the past, the engineer was, de facto, treated as the second in command because he was the most experienced person aboard aside from the master. Yet few engineers ever had any formal training.

In response to Public Law 96-378, the Coast Guard sent a team of two engineers from the Coast Guard Institute in Oklahoma City to meet with an ad hoc industry group to discuss appropriate examinations for the new OSV engineer licenses. The Coast Guard team, headed by Mr. Jerry Askin, proposed a typical "deep sea" approach to engineer licensing. This was based upon their lack of specific knowledge of the offshore oil industry. This approach was rejected by those in attendance.

Textbooks. At the time of that meeting, Mr. Bob Ward, a retired Coast Guard engineering officer with years of practical experience in Coast Guard and industry, had written a handbook called Workboat Engineer and Oiler that he believed would be useful to engineers in the industry. It consisted of one volume of about 300 pages with fairly large type. This was not a "question-and-answer" book. Although not "approved" or "accepted" in any way, the book was listed in the Coast Guard bibliography. After the meeting, many USCG exam questions used this book as their source.

The relatively few engineer candidates sitting for new M&O Engineer licenses had no trouble passing the exam using this book until the late-1980s.

When the Coast Guard's merchant marine examination section moved from Oklahoma City to Washington, in the late 1980s, the new Coast Guard employees dramatically increased the scope and coverage of the OSV exams. This was done by utilizing the large bank of multiple choice exam questions developed during the early 1980s. In deciding to update Workboat Engineer and Oiler to be useful in exam preparation, it was necessary include, organize, and explain hundreds of multiple choice answers.

Yet, the Coast Guard refused to make the codes assigning questions to various levels of exams available to any maritime educators. This made it extremely difficult to scope and prepare the appropriate study material. Eventually, to provide full coverage for license candidates, the book expanded to three volumes with 1,480 pages of fairly small type and a copy of the USCG Merchant Marine Engineering Illustration Book for reference. The large volume of training material to pass what should have been a rather basic Coast Guard exam discouraged many license candidates.

Approved courses. The Coast Guard has approved only one "lower-level" engineering course at the Seattle Central Community College. This course, called the "Marine Engineering Technology Program" extends over a nine-month period. A graduate of that program "meets service and exam requirements for DDE limited, 1000 or 4000 hp, provided

recency and other requirements are also met." The length of the course, its residency requirements, and the location where it is given ensure that it will not attract any engineer candidates from the Gulf Coast area.

Nevertheless, the Seattle course also appears to set the standard that any comparable "approved course" must meet. At least one local private training school's application was summarily rejected because its proposed course was "too short" in fact, much shorter than nine-months. Consequently, Coast Guard approved "lower-level" engineering courses are currently unavailable to candidates in the Gulf area.

Home-study and guided-study courses. Home study for "lower-level" engineering licenses is based on reading the series of textbooks described above. However, some but not all "exam-prep" schools will work with individual candidates to tutor them for the standard Coast Guard exam. Many candidates report spending months in school primarily engaged in a repetitive review of existing Coast Guard multiple choice questions and answers a period they considered dull and unproductive.

Check-list Engineers. In 1996, the Eighth Coast Guard District initiated a program called the "Offshore Industry Competency-Based Qualification System" at the insistence of industry. This system uses a course approved by the Coast Guard and sponsored by a company, which can be either an in-house program or conducted by a third party. It is important to note that this type of program is not the standard "approved course in lieu of examination." In fact, we are not sure exactly what its status is and asked the Coast Guard for clarification! The course must include a "Coast Guard approved training book and end-of-training, company practical / written exam."

This program is based on OCMI Policy #1-B-96. We are unclear as to whether this is strictly an OCMI New Orleans program or whether this program and the licenses it generates are recognized throughout the Coast Guard. The special license has restrictions that appear to tie the mariner to one employer and restrict his ability to change jobs without losing much of the credit he may have amassed.

On March 3, 2000 we wrote a letter of inquiry to the Eighth District Legal Office. The letter was forwarded to the National Maritime Center for reply which we await. Our letter stated:

"Our Association has received a number of complaints from our members that endorsements with wording similar to that used on licenses such as the attached example (with name and other personal information redacted) restrict the employment of the licensed individual to the named company, in effect making that individual an indentured servant.

"It is our understanding, subject to your explanation or correction, that the period of service restricted by the wording of that endorsement is limited to one year. However, if this is correct, we would further ask:

- Is that service limited to a calendar year (which is simple to calculate from the issue date on the face of the license)? If that is the case, we would ask that the date be specified on the reverse side of the license.
- Is that service limited to one year of sea service (which

varies with each individual, is more difficult to calculate, and should require the employer to provide a sea service letter at the end of that period of service)? If that is the case, we would ask that the license holder be provided with complete instructions as to the steps he/she must take and the expense he/she must bear to remove the restriction. Our members have found that removing the restriction is a prerequisite to obtaining employment with a different employer. We also request a copy of those instructions.

- What specific steps must the company whose name appears in the endorsement take to notify its employee that his/her year of service is complete and formally release the individual's license from this restriction so that he/she may continue to hold the tonnage/horsepower endorsement yet seek employment elsewhere?

"We are concerned that employers are abusing the existing system and that individual mariners do not believe they are free to seek employment with other employers at the end of the one year period, to wit:

- The employer is not required to furnish an individual with a full and complete sea-service letter in a timely manner to assist him in obtaining another job. It may not be in an employer's interest to do so, especially in a tight labor market. This is a long-standing problem that needs to be corrected by appropriate regulations. Nor does it appear that a marine employer is under any obligation to furnish a present or former employee with copies of the vessel logs verifying his service in spite of the fact that the employee may have prepared these logs on behalf of his employer.
- We believe that such endorsements, if continued to be permitted, should be given a definite expiration date and should not require the mariner to engage in a separate transaction, or fill out another license application blank, or pay a separate \$45.00 "user fee," or waste his/her valuable time and money seeking an appointment at the Regional Examination Center for the purpose of expunging these endorsements from a license. Such procedures make it extremely difficult for a mariner to obtain a better job in a timely and predictable manner.

"We openly question the basis upon which the Coast Guard has underwritten a policy that appears to favor certain employers at the expense of a large body of working mariners especially when fully licensed individuals are already available.

"We seek to have our attorneys closely examine your current policy including its basis in law and regulation. Consequently, we respectfully request that your office furnish us with copies of all pertinent documents including the policy itself, any approvals from Headquarters regarding this policy, any interpretations affecting this policy, as well as all correspondence dealing with this policy to allow our attorneys to make an informed decision on its merits and legality. If a formal Freedom of Information Act request is required to obtain any portion of this information, please advise us. If any fees are required to research this information in excess of \$50.00, please notify us before proceeding."

Our Association receives persistent reports that many engineers serving on OSVs have not been adequately

trained to perform their jobs, are not provided with sufficient tools to perform even the most rudimentary repairs, and that insufficient servicable parts are available. Some engineers are told not to attempt to make repairs but, rather, to call the company if machinery or equipment breaks down.

We believe that OSVs deserve the services of skilled and knowledgeable engineers who have been properly and fully instructed in machinery maintenance and repair including electrical machinery. We note that there are no schools in the Gulf area that provide all the necessary training for OSV engineers within a reasonable time frame. Although this is not an insurmountable problem, adequate training for engineers is something that the vessel operating companies have taken all possible steps to avoid for the past forty years. Sadly, companies now lack the pool of trained employees they need to meet both STCW requirements while working mariners who hold (or seek to hold) jobs as engineers are denied the type of training they need to perform their jobs in a professional manner.

We believe the industry needs to train a pool of fully qualified engineers that are capable of professional advancement in the industry.

We believe that the Coast Guard has failed to offer meaningful leadership and guidance in this regard and has found it more expeditious to cave into industry demands for special treatment. The position the industry finds itself in today is one of its own making. As a result, the status of trained vessel engineers in this industry is extremely questionable and requires immediate attention and improvement.