

Written Testimony
of
Burt W. “Tom” Thompson
Executive Director
United States Marine Safety Association
5050 Industrial Road
Farmingdale, NJ 07727
732-751-0102
www.usmsa.org

~

Subcommittee on Coast Guard and Maritime Transportation

Challenges Facing the Coast Guard Marine Safety Program

Thursday, August 2, 2007
2:00 PM

Rayburn House Office Building, Room 2167

Submitted July 30, 2007

Burt W. "Tom" Thompson
Executive Director
United States Marine Safety Association
5050 Industrial Road
Farmingdale, NJ 07727
732-751-0102
www.usmsa.org

Good morning, Mr. Chairman and members of the subcommittee and thank you for this opportunity to speak. I will be brief in my oral statement but request that my full written statement be entered in the record.

The United States Marine Safety Association is a professional organization comprised of more than 150 companies and individuals, including international membership. Members are involved in the design, manufacture, sale or service of lifesaving equipment or its components; provide training in the use of such equipment and systems; or are career professionals in maritime safety.

I have worked in the marine safety field for over 20 years. I served as chairman of the ISO Subcommittee on Marine Lifesaving and Fire Protection and still represent US interests on a number of ISO subcommittees dealing with maritime safety issues. I am a member of the US Delegation to the IMO (International Maritime Organization) and participate on the Fire, Protection and Design and Equipment subcommittees, Lifesaving Appliances working group and correspondence groups. I hold a US Merchant Mariner's Deck License and have trained mariners in emergency drills, deck safety and sea survival.

Lifesaving Appliances are the last line of defense in assuring the safety of life at sea. Survival craft and personal lifesaving appliances are the only protection passengers and crew have from drowning and hypothermia in the event of a commercial or recreational vessel casualty and therefore must meet a very high standard of reliability. In the past, the Coast Guard helped assure this reliability and oversaw the manufacture of lifesaving equipment, and witnessed the servicing of primary lifesaving equipment – lifeboats and inflatable liferafts in particular. Over the past ten years however, Coast Guard participation and oversight has been significantly diminished.

Current USCG specifications for approval of inflatable liferafts were issued to incorporate the technical revisions of SOLAS (IMO's International Convention for Safety of Life at Sea) liferaft requirements. A change was made to USCG requirements for inspection of raft manufacturing plants and raft servicing facilities. This change was that after the initial approval of the raft, the manufacturing plant and servicing facilities were no longer required to have a USCG inspector present during liferaft servicing. Therefore, attendance of the USCG inspector is not at the discretion of the local USCG. However, the service facility is still required to inform the local Coast Guard when servicing of a liferaft is being conducted. Since this change, Coast Guard attendance at liferaft servicing has all but

disappeared. In some cases, it has been more than ten years since some service facilities have seen a USCG inspector.

This change was driven by resource availability and the assessment of the associated risk. This resource constraint was a real problem from more than just USCG perspective. Rafts are often brought from ships for servicing on short notice and at odd hours (evenings, weekends, and holidays). Usually USCG inspector attendance could not be scheduled in a timely manner because of this or because of the inspector's assignment to other duties. While this was a problem for the facility, it had a greater impact on the ship that needed the raft back in time to sail.

Mandatory CG oversight of CG approved lifesaving equipment, as was done in the past, places a significant burden on CG inspection resources and places the vessel in-port time table in the hands of the Coast Guard. Delay of CG inspectors arriving at the service facility would, and did in the past, hold vessel in port and delay the sailing at a cost of thousands of dollars for merchant vessels. Port turnaround times are often significantly shorter now than in the past.

In general, USCG approved rafts are being serviced in the US in a proper and correct manner. Although we are aware there have been problems that in all probability would have been quickly resolved had there been active Coast Guard involvement. We note that when a servicing facility finds a problem with a raft when it is opened for servicing, the facility is required to notify the local USCG and the manufacturer. The facilities do notify the local USCG but usually this is seen by the local USCG as one problem, even though it may be happening at several locations and reported to other local USCG offices. Because of this, usually little priority is given by the local USCG as they appear to be "single occurrence" issues and no one is in a position to perceive the extent or significance of the problem.

Therefore, the USMSA recommends that in addition to reporting to local Coast Guard offices, problems and deficiencies be reported also to the Lifesaving and Fire Safety Standards Division in USCG Headquarters, who is responsible for approval of this critical lifesaving equipment.

USMSA member service facilities made the following points:

- Service facilities notify the local USCG MIO when USCG approved rafts are being serviced.
- USCG had not made visit for a number of years, in some cases up to 10 years.
- USCG does send a rep when rafts from USCG cutters are being serviced (often an auxiliary member who is not familiar with raft servicing).
- One facility noted that they train USCG inspectors that are doing vessel on board inspections to show them what to look for and how rafts should be properly "stowed" on board.
- There was common agreement that rafts are being properly serviced, although from time to time defects are found from a previous servicing.
- Raising the level of oversight would reduce opportunity for improper servicing.

- Often, inspectors have little familiarity or training in servicing of lifesaving equipment.
- Several inspectors have checked servicing equipment calibration and facility cleanliness but have not looked at any rafts being serviced.

The Coast Guard provides the only perspective and commonality that extends across manufacturers and service facilities, across the United States, and around the globe, wherever equipment for US flag vessels is manufactured, repaired or serviced. They are the only authority in a position to provide early identification of concerns or issues. Several years ago, a problem was encountered with an inflation valve used on several manufacturers' liferafts. These problems were reported to the OCMI as required. These problems were not reported to Coast Guard Headquarters, so each OCMI looked at the incidents as isolated events until there was a significant number of problems in each zone or coming into each service facility or reported to each manufacturer. Had the problems been reported to HQ, there would have been the opportunity for much earlier identification of the problem.

Compounding this issue was the fact that the manufacturer of the defective valve components (not a USMSA member) continued to deny that there was a problem and further threatened manufacturers using this valve with lawsuits if they publicly stated that there was a problem. When contacted, USCG headquarters personnel told the industry that they did not have sufficient data to know how to address the issue. Unfortunately the information submitted by the industry to the OCMI never made its way to the appropriate offices or people in HQ. The issue was rectified in time as the manufacturers substituted other approved valves and submitted the design change for CG approval. The Lifesaving Appliances personnel were very responsive in facilitating approval of the design change.

If Coast Guard had been directly involved, this situation would have been rectified much more quickly. It should be noted that most of these points are system and procedural rather than personnel issues.

RECOMMENDATIONS

These issues in general are reflective of circumstances across the Marine Safety program. We urge Congress to support and restore this crucial and long-standing mission of the Coast Guard and make suitable resources available.

More specifically, we recommend the following:

- USCG establish a periodic audit program of the manufacturing and service facilities to assure proper servicing and to assure that raft servicing facilities have correct information, technical bulletins and service materials and authorized parts from manufacturers
- USCG assure the personnel performing these inspection and audit duties be properly trained

- USCG amend deficiency reporting requirements such that reports are made directly to the Lifesaving and Fire Safety Standards Division in USCG Headquarters in addition to the local MIOs
- Congress provide appropriate resources to assure Coast Guard capabilities to adequately carry out these functions

Thank you very much for your kind attention, your concern and your continued support for marine safety.