



801 North Quincy Street
Suite 500
Arlington, VA 22203

PHONE: 703.841.9300
EMAIL: cstewart@americanwaterways.com

Caitlyn E. Stewart
Vice President – Regulatory Affairs

March 17, 2023

Mrs. Megan Johns-Henry
Alternate Designated Federal Officer
National Merchant Marine Personnel Advisory Committee
2703 Martin Luther King Jr. Ave., SE
Washington, DC 20593-7509

Re: National Merchant Marine Personnel
Advisory Committee; March 2023 Meetings
(Docket No. USCG-2023-0099)

Dear Mrs. Johns Henry:

The American Waterways Operators (AWO) is the tugboat, towboat and barge industry's advocate, resource, and united voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. Our industry is the largest segment of the nation's 40,000-vessel domestic maritime fleet and moves 665 million tons of cargo each year safely and efficiently.

On behalf of AWO's more than 300 member companies, thank you for the opportunity to provide comments to the members of the National Merchant Marine Personnel Advisory Committee (NMERPAC). The tugboat, towboat and barge industry supports more than 270,000 jobs in related industries nationwide, including 38,000 positions as mariners on board our vessels. AWO members are deeply committed to ensuring the safety of mariners aboard their vessels and upholding the competency of our workforce. In that spirit of cooperation, AWO is pleased to offer these comments.

Task Statement 22-4, Mariner Workforce Issues

AWO fully supports the Coast Guard's effort to "eliminate duplication and streamline methods for meeting requirements for an MMC" and would like to play an active role in identifying "actions the Coast Guard, federal partners, and maritime stakeholders can take to provide long- and short-term solutions for the manning of U.S. vessels." However, the Coast Guard's tasking to NMERPAC is currently drafted far too narrowly in its scope and excludes a significant population of the mariner workforce that performs critical national security roles. Every day, mariners serving on board tugboats, towboats, and barges perform national security duties,

including transporting jet fuel and petroleum products in tank barges and articulated tug-barges, towing munitions and other military cargoes on barges, and assisting military ships in and out of ports and shipyards.

AWO agrees that one facet of the mariner shortage's impact to national security is "the ability to crew the U.S. Surge Sealift vessels that support national security needs," and does not dispute that "[t]he inability to crew deep sea vessels has immediate national security implications." Equally important, though, is the daily national security imperative that mariners on board tugboats, towboats, and barges perform to sustain the U.S. military and government agencies as well as the national economy. For that reason, AWO proposes an amendment to Task Statement 22-4 (appended to these comments) that will ensure NMERPAC and the Coast Guard are able to consider, and act on, the full range of issues affecting the manning of U.S. vessels.

We thank you again for the opportunity to comment on NMERPAC's work on this standing task statement. We would be pleased to answer any questions or provide further information to assist the committee in advancing this change.

Sincerely,

A handwritten signature in cursive script that reads "Caitlyn E. Stewart".

Caitlyn E. Stewart
Vice President – Regulatory Affairs

NATIONAL MERCHANT MARINE PERSONNEL ADVISORY

COMMITTEE (N-MERPAC)

TASK STATEMENT 22-4

“Mariner Workforce Issues”

I. TASK DESCRIPTION

The Coast Guard seeks recommendations from NMERPAC on methods to address the shortage of credentialed U.S. Merchant Mariners in order to support efficient transport of cargo and national security needs.

II. BACKGROUND

The U.S. has six state and one federal maritime academy that annually graduates cadets with both an undergraduate degree and a Merchant Mariner Credential (MMC) with an operational level officer endorsement. However, the U.S. maritime industry has experienced ongoing shortages of mariners credentialed to operate vessels at both the support level and the management level. This shortfall not only affects the national and international supply chain but also affects the ability to crew the U.S. Surge Sealift vessels that support national security needs. The ongoing effects of the COVID-19 pandemic have further exasperated these mariner shortages.

III. PROBLEM STATEMENT

The Coast Guard is limited in their ability to address maritime labor issues. The Office of Merchant Mariner Credentialing (CG-MMC) and the National Maritime Center do have ongoing initiatives that aim to streamline the mariner credentialing process and reduce the processing time for receiving MMCs. The offices are also working on the processes and processing time for obtaining Coast Guard approval of required training.

CG-MMC is currently reviewing credentialing laws, regulations, and policies to identify areas where amendments can be made to eliminate duplication and streamline methods for meeting requirements for an MMC. The Coast Guard seeks the input of maritime stakeholders, via NMERPAC, to identify actions that can be implemented by the Coast Guard, federal partners and maritime stakeholders to provide long- and short-term solutions for the manning of U.S. vessels.

IV. TASK

The Coast Guard seeks recommendations from NMERPAC on methods to address the shortage of credentialed U.S. Merchant Mariners in order to support efficient transport of cargo and national security needs. The recommendations may be specific to Coast Guard

mariner credentialing laws, regulations, policy, or processes or may be specific to federal partners and maritime stakeholders. NMERPAC is requested to:

1. Consider that mariner shortages have been experienced in the maritime industry in its efforts to crew 11 vessels for a US TRANSCOM turbo activation. The inability to crew deep sea vessels has immediate national security implications. Based upon that consideration, NMERPAC should provide recommendations on how to streamline the requirements and process for mariners to obtain national unlimited tonnage oceans endorsements and the appropriate corresponding STCW endorsements.
2. Consider that mariner shortages have been experienced throughout the maritime industry. The inability to crew vessels that provide or support national security operations also has immediate national security implications. Based upon that consideration, NMERPAC should provide recommendations on how to streamline the requirements and process for mariners to obtain national endorsements and, if appropriate, STCW endorsements.

V. DUE DATE

This is anticipated to be a standing NMERPAC sub-committee. NMERPAC will provide its comments to the Coast Guard semi-annually at its scheduled meetings.

VI. COAST GUARD TECHNICAL REPRESENTATIVE

Ms. Megan Johns Henry; megan.c.johns@uscg.mil

VII. WORKING GROUP CHAIR(S)

Augusta Roth & Theodore Morley
Name(s)

09/07/2022
Date

3
Meeting #

Accepted Under the Approval of:

Captain Gerard C. Pannell
Chair
NMERPAC

Ms. Mayte Medina
U.S. Coast Guard
Designated Federal Officer

Accepted: 09/09/2022
Modified/Amended:
Closed: