

October 27, 2023

Rear Admiral Wayne R. Arquin
Assistant Commandant for Prevention Policy
U. S. Coast Guard
2703 Martin Luther King Jr. Ave SE, Stop 7509
Washington, DC 20593-7509

Subj: National Towing Safety Advisory Committee Final Report – Task 21-04 – *Report on the Challenges faced by the Towing Vessel Industry as a result of the COVID-19 Pandemic*

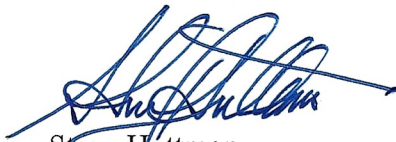
Dear Admiral Arquin,

I am writing today to forward the final report and recommendations of the National Towing Safety Advisory Committee (NTSAC) for Task 21-04 - *Report on the challenges faced by the Towing Vessel Industry as a result of the COVID-19 Pandemic*. At the fall meeting held in New Orleans, Louisiana on September 27, 2023, the Committee unanimously approved the enclosed report and recommendations.

The Subcommittee Chair, Ms. Angie Fay and Co-Chair Ms. Joy Terral worked with the subcommittee members to provide thoughtful recommendations to guide the Coast Guard in the future when dealing with a pandemic which may affect the Towing Vessel Industry.

The members of the National Towing Safety Advisory Committee greatly appreciate the support and cooperation of the U. S. Coast Guard participating and assisting the subcommittee with the Task. We are grateful for the opportunity to provide to the Coast Guard the advice and recommendations from the Towing Industry and Public as the Coast Guard conducts its regulatory oversight. Should you have any questions regarding the final report or recommendations, please don't hesitate to call or email.

Sincerely,



Steve Huttman
Chairman, National Towing Safety Advisory Committee

Encl: (1) Final Report – Towing Safety Advisory Committee Task 21-03 – September 27, 2023

cc: Ms. Angie Fay – Chair, Task 21-04
Ms. Joy Terral – Co-Chair, Task 21-04
Mr. Matthew Layman – DFO, National Towing Safety Advisory Committee
Ms. Laura Wilcox – Vice Chair, National Towing Safety Advisory Committee



NATIONAL TOWING SAFETY ADVISORY COMMITTEE

TASK 21-04

Report on the challenges faced by the Towing Vessel industry as a result of the COVID-19 Pandemic.

(Short Title – COVID-19 Challenges)

Final Report and Recommendations

NATIONAL TOWING SAFETY ADVISORY COMMITTEE

September 27, 2023

To: National Towing Safety Advisory Committee

From: Angie Fay, Chair
Joy Terral, Co-Chair

RE: Task 21-04 **“Report on the challenges faced by the Towing Vessel industry as a result of the COVID-19 Pandemic.”**

At the December 7, 2021 National Towing Safety Advisory Committee meeting, a subcommittee was tasked with reviewing the challenges faced by the towing vessel industry as a result of the COVID-19 pandemic and report back to the NTSAC committee with a number of recommendations and suggestions for the USCG.

Angie Fay was nominated as Chairman and Joy Terral was nominated as Co-Chair of this Subcommittee. Both nominations were approved by NTSAC members without dissent.

Respectfully Submitted,

Angie Fay
TASK 21-04 Subcommittee Chair

Enclosure: (1) Task Statement 21-04
(2) AWO/COVID-19 Survey questions
(3) U.S. Mariner Mental Health & Wellbeing During COVID-19 and Beyond

BACKGROUND AND APPROACH:

With the onset of the COVID-19 pandemic, industries and the organizations that supported them struggled with maintaining their business while keeping their employees safe. Each passing week, something new was learned of the virus and along with it came best practices to deal with the number of issues facing organizations. The towing vessel industry, although diverse in operations, geography, and vessel size, came together to share with each other what they were experiencing and how each company was managing the pandemic. Guidance was presented by the CDC on how best to mitigate and manage the pandemic aboard maritime vessels, however, the majority of the guidance was geared towards offshore vessels, large container/tanker vessels, which are very different than the towing vessel industry. Additionally, the USCG posted guidance regarding mental health among mariners, which was broad in nature. The American Waterways Operators, the towing vessel industry trade organization, did their best to bring experts in the field to the membership and small committees were created to help manage and filter through the loads of information. Most companies created internal COVID-19 working groups to assist in the day-to-day management of testing protocols, hygiene within the office and vessels, etc.

It should be noted that although there were a number of groups and committees that met on a regular basis to discuss the day-to-day management of COVID-19, there appeared to be no single repository for information relative to the inland towing vessel industry, nor was there any single organization that maintained such data. The committee realized that in order to gauge the effectiveness of the CDC guidance and USCG MSIB, an independent survey would need to be created in order to get a solid indication of where the towing vessel industry stood with respect to these reference documents.

With the assistance of the American Waterways Operators, and approval of the NTSAC Committee, a survey was developed to seek information whether organizations were familiar with the guidance provided by CDC and USCG, did their organizations utilize any of the information, and to gather any best practices identified during the pandemic. The survey was also geared towards determining if organizations found the reference documents helpful, and also asked to share any best practices and suggestions for improvement. Additionally, the committee took the opportunity to ask additional questions relative to crewing issues, payments, vaccination protocols, etc.

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The survey was submitted and made available to every American Waterways Operators member who had a representative on the Safety Leadership Advisory Panel (SLAP). The SLAP membership consists of a variety of members who are geographically dispersed throughout the country, consists of large and small operators, and operators of different industry sectors. Additionally, each member of the NTSAC committee had access to the survey and it was also made available to members of the public at the January 5, 2022 meeting.

PLAN OF ACTION (POA)

1. Since there did not appear to be any one repository for information, the subcommittee had to gather the information on our own.
2. Seek input from AWO membership and NTSAC membership with regards to their experience factors during COVID-19.
3. Create a questionnaire designed around each area of the CDC guidance to gain insight into if companies reviewed the guidance, found it helpful, and whether they used it in their day to day management of COVID-19.
4. Gather and review best practices being undertaken by industry.
5. Review survey conducted by University of Washington on Mariner Health.
6. Present findings and recommendations to TSAC Members and solicit feedback.
7. Submit Final Report not later than September 2023.

ACTION

1. TASK Chair Angie Fay was nominated by NTSAC.
2. Joy Terrell appointed Co-Chair.
3. Survey created by American Waterways Operators and made available to SLAP members, NTSAC members, and public.
4. Survey results reviewed and discussed during September NTSAC meeting in Houston, TX.
5. Reviewed and analyzed results of survey.
6. Reviewed survey report from survey conducted by University of Washington on Mariner Health.
7. Draft report submitted for consideration to NTSAC at the April, 2023 conference.
8. Draft final report submitted for consideration to NTSAC.

ANALYSIS OF SURVEY RESULTS

This report will break down each guidance document and what consensus was relative to each one below:

CDC Guidance discussion:

The CDC guidance provided within the task statement covered the following areas:

- Planning and Prevention
- COVID-19 Vaccinations
- Pre-boarding procedures
- Testing for COVID-19
- Isolation or Quarantine
- Options for Managing vessels with one or more confirmed case
- Disembarking
- Reporting
- Port interactions
- Supplies
- Cleaning and Disinfection

Note: Some of the comments were taken directly from the respondents' survey submission.

The CDC guidance that was provided focused on ships and were not easily well suited for the towing vessel size and crew size. In order to gain insight on the effectiveness of the CDC Guidance, lets analyze the results of the survey conducted by this subcommittee.

There were fourteen respondents to the survey. A copy of the survey questions is included as part of the report.

Of the fourteen respondents, nine referred to the CDC guidance and found it somewhat helpful, while only two indicated that it was not helpful.

The consensus from the respondents was that the CDC guidance did not fit well with Marine Operations for the towing vessel industry and was geared more towards offshore vessels, ships, and cruise lines. Additionally, towing vessels and harbor tugs close quarters makes mask wearing and distancing of six feet extremely difficult. Most galley arrangements on towing vessels and harbor tugs are small in size, comparable to a standard ten foot by twelve foot (10'x12') residential kitchen. The work schedules for these vessel types are also one week on and one week off for some, while others work for ten to fourteen days on, so quarantining on the vessels was also not very practical.

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Other survey respondents felt that the CDC guidance came to industry late when compared to the actual (on the ground pace of events) and flawed when compared to contemporaneous international scientific consensus. The reporting guidelines and prevention policies appeared to cater more towards cruise ships, ferries, and other forms of mass public transportation. The guidance on reporting was clearly geared towards ships entering the US from foreign ports and not US Jones Act flagged vessels moving between US ports.

Interestingly, more than 70% of the respondents in the survey indicated that their organizations followed the guidance provided by the CDC in each of the eleven categories with a number of them indicating that they felt following the guidance was the right decision.

USCG Mental Health for Mariners Survey Analysis

The MSIB 07-21, COVID-19 Spotlight on the Mental Health of Mariners reiterated the fact that a number of mariners experience mental health issues outside of the additional stressors of the COVID-19 pandemic and a very large portion of those mariners do so under the control of medical professionals and successfully renew their medical certificates. It is believed that the intent of the USCG MSIB was to reinforce the notion that taking care of one's mental health is vitally important and that doing so would typically not interfere with licensing issues. Additionally, the committee felt the guidance was also to recognize the toll that the COVID-19 pandemic was having on mariners, especially those whose time at sea was lengthy.

Of the fourteen respondents to this subcommittee's survey, only ten indicated that their organizations referred to the USCG MSIB for guidance during the pandemic and only eight of those respondents indicated that the guidance was helpful. Respondents indicated that they felt the guidance was geared more towards blue water companies and that most crews felt safe aboard their tows. Additionally, most crews didn't want shore leave during the pandemic and most towing vessel companies significantly reduced the amount of vessel visits to assist in keeping the crews safe and healthy.

Only three respondents indicated that they had mariners appear to suffer from mental health issues during the pandemic and those companies provided educational materials, constant messaging of the issues at hand, and access to employee assistance programs. Only one respondent indicated that there was a delay in processing times at the NMC and there was not a consensus on whether or not mariners' mental health had improved over the last year.

As part of the MSIB issue and to follow suit with the mental health of mariners, The Environmental and Occupational Health Sciences School of Public Health at the University of Washington conducted a survey of mariners titled U.S. Mariner Mental Health & Wellbeing During COVID-19 and Beyond. The Mental Health Survey was open to mariners for a six month time frame in

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the first half of 2021. 1,384 mariners who sailed during the COVID-19 pandemic responded to the survey and of those, 181 mariners were from the inland waterways and harbor tugs. The overall summary of mariner mental health as stated on page 16 of the report reads, “Overall, the mariners who participated in this survey tend to have a larger burden of mental health outcomes than seen in the general public (pre-COVID-19) and had elevated rates as seen in other worker populations during COVID-19. The survey design doesn’t allow us to understand if this was due to COVID-19, the nature of work the mariners are doing, or other factors.”

Dr. Marissa Baker who spearheaded the University of Washington survey had indicated that specifically for harbor tugs, those respondents showed elevated signs of Post Traumatic Stress Disorder (PTSD). After further discussion at the Spring 2023 NTSAC meeting, it was learned that most harbor tug crew members conduct crew change as complete units. Meaning, harbor tugs arrive to dock simultaneously and complete crew changes together. This method allows for camaraderie, sharing of lessons learned from the last hitch, and perhaps a meal. COVID-19 brought these practices to a halt, which clearly had a negative impact on the mental wellness of these mariners.

General Questions of NTSAC Survey

The subcommittee posed additional questions in the survey to gauge thoughts from industry on other aspects of the day to day management of COVID-19 within their organizations. These questions covered areas from protocols, best practices employed within their organizations on managing the spread of the virus, how the organizations dealt with their mariners wellbeing, specifically mental health, any negative feedback from ports and/or facilities, costs associated with testing, changes with crew change, vaccine requirements and any other best practices not covered.

Most respondents indicated that their organizations created COVID-19 task forces to collectively make decisions for how to handle the many facets of the pandemic. A number of respondents indicated that they were most effective at creating protocols that focused on as little interaction with the vessel crews as possible so as to keep them safe and healthy. Those same protocols also effectively managed testing and questionnaires prior to boarding and having different protocols when more than one crewmember became infected with the virus. A number of respondents indicated that their organizations also covered the fees associated with testing, travel, and pay while out with the virus. Most, if not all of the respondents provided PPE, cleaning and sanitization products, along with cleaning protocols to ensure the vessel remained clean and sanitized. There were also a number of respondents who indicated that their organization had employed firms/medical professionals who guided them in creating protocols to effectively manage the day to day aspects of the pandemic based off of scientific and medical applications.

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One respondent indicated that they limited sick pay, which may have encouraged mariners who were infected to return before they were out of the contagious phase. Others felt that it was challenging to control mariners' actions and level of precautions while they were home. A fear of missing paychecks also fostered a challenge to ensure accurate reporting of symptoms.

When asked whether their mariners experienced negative interactions with ports or facilities during the pandemic, nine respondents indicated “no,” four indicated “yes,” and one did not respond. Facilities were also trying to keep their employees safe and healthy, therefore some were reluctant to allow crews to make crew change while at their dock. Also, there was no consistency amongst ports or facilities and it was also challenging to get infected crewmembers off of vessels and back home. There was a time when travel across state lines became difficult as some states had mandatory quarantine policies to comply with. Most respondents indicated that to overcome these challenges, operations were altered to ensure limited interactions with ports and/or facilities, limiting crew changes at known facilities that allowed such action, and communication with docks seemed to lessen the negative effects of these particular challenges.

Vaccination requirements also seemed to weigh heavily on the minds of mariners and companies alike. While some companies had vaccine requirements, others encouraged vaccines to keep crewmembers safe while not taking an official stance on the issue. One NTSAC survey respondent noted that the anxiety of their mariners seemed to lessen once they indicated vaccines were not going to be required as a condition of employment. From the many meetings and discussions held on vaccines, the majority of companies who were not mandating the vaccines, were encouraging their mariners to speak with their health care professionals for advice and guidance.

RECOMMENDATIONS AND SUMMARY

The negative effects of the COVID-19 pandemic on the maritime industry were very real as there were a number of challenges that makes applying broad protocols and regulatory requirements difficult given the size of a towing vessel and its crews respectively. Keeping commerce moving is what towing vessels do on a daily basis, and although COVID-19 slowed commerce for a time, it didn't stop it completely. Industry often times found themselves acting on situations that were unfolding days before guidance arrived, so organizations and industry worked together to share what was working for each other in each new aspect of the pandemic.

- The committee recommends the USCG work with government partners to create procedures to ensure all sectors of the maritime industry are taken into account prior to creating or implementing protocols or requirements that effect industry operations. It is imperative to be cognizant of the fact that towing vessels are much smaller in size when compared to offshore vessels, ships, tankers, and cruise ships. Similarly, crew size on towing vessels is significantly smaller than those vessels mentioned above. Therefore, not all guidance and/or protocols that work for larger vessels can be easily applied to towing vessels.
- The committee recommends the USCG continue to be proactive and vocal with respect to mariner mental health in the hopes this may help in removing the stigma of the disease. Continuing to process medical certificates of mariners who suffer from mental illness and successfully and safely function under the direction of a medical profession is vital. There was a push to bring this issue to light a few years back by a major oil company and those towing vessel companies that work for that major oil company have begun incorporating mariner health awareness within their organizations.
- The committee also suggests that if the USCG were to require the reporting of certain illnesses like COVID-19 infections, that clear guidance and direction be provided to all local OCMI's to ensure continuity throughout the USCG and to also ease the burden on industry. Creating company protocols for each sector OCMI is not a practical application.

The resiliency of the towing vessel industry shines brightly and serves as a clear example of grit and determination. The industry has proven itself in their ability to adjust, adapt, and persevere in challenging times. The industry hopes the challenges faced during the COVID-19 pandemic can be overshadowed by the USCG, the CDC, and others having a renewed appreciation for the uniqueness of this piece of the maritime industry and how they differ from other maritime sectors.