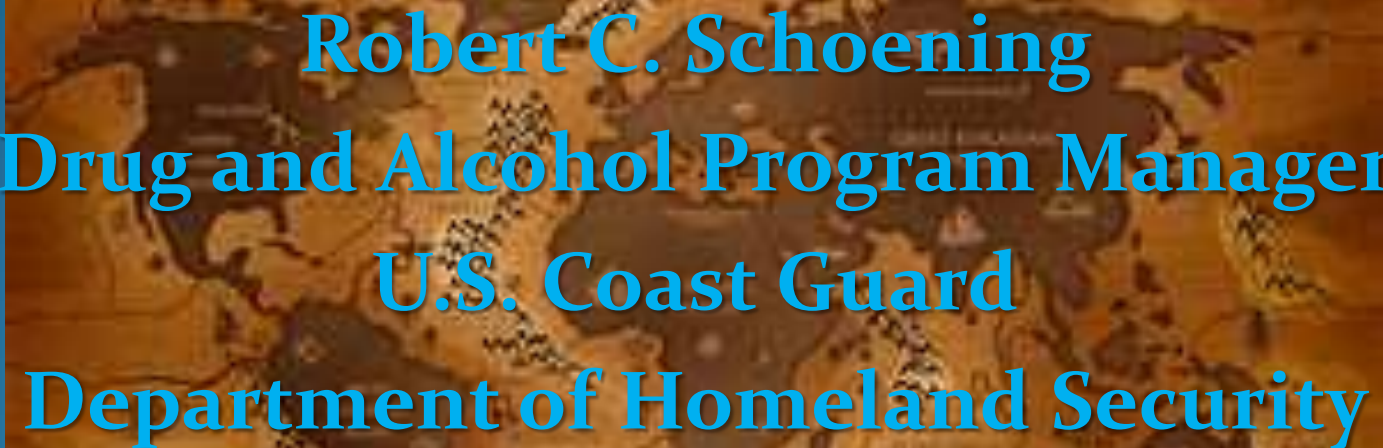


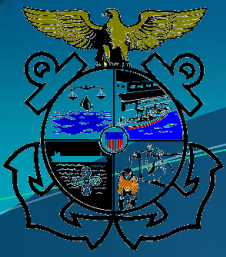


U.S. Coast Guard

International Drug Test Issues



Robert C. Schoening
Drug and Alcohol Program Manager
U.S. Coast Guard
Department of Homeland Security



International Maritime Presence

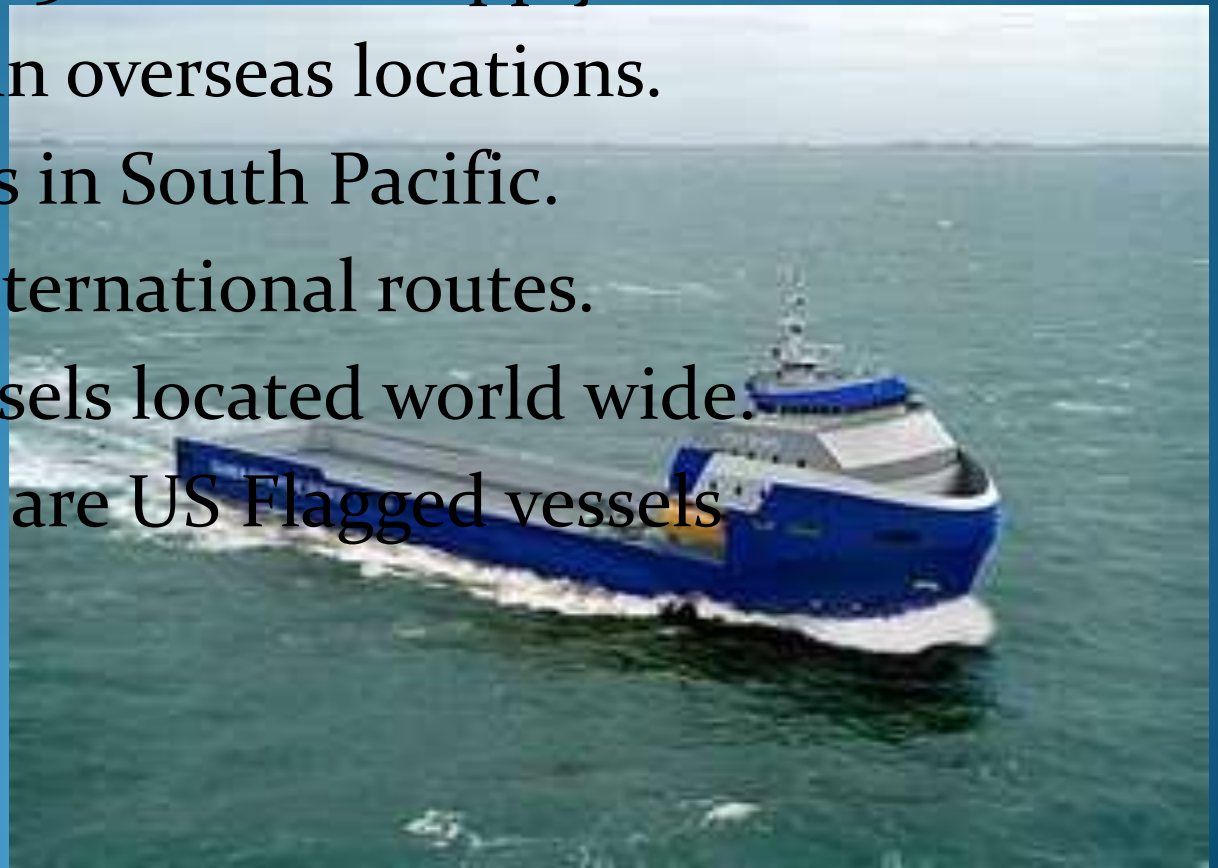
Approximately 115 Offshore Supply
vessels located in overseas locations.

36 Purse Seiners in South Pacific.

Freighters on international routes.

Misc. Other vessels located world wide.

All of the above are US Flagged vessels





Countries with OSVs

Approximately 18 + different countries where Offshore Supply Vessels and other vessels are located.

Country	
Mexico	Egypt
Brazil*	Netherlands
Trinidad	Spain
Nigeria	United Arab Emirates
Angola	Dubai
Cameroon	Qatar
Singapore	Indonesia
Vietnam	Diego Garcia
South Africa	China

* Major issue now with US OSVs located in Brazil



Coast Guard Requirements

1. Marine employers responsible for compliance.
2. Required to have U.S. Coast Guard licensed vessel master.
3. Can have non-U.S. personnel filling vessel positions including safety-sensitive positions.
4. Non-U.S. personnel subject to testing consistent with Coast Guard regulations.
5. Will entertain waiver requests provided alternative safety compliance plan is submitted.



International Issues

1. Specimen collection
2. Collection facilities and collection supplies
3. MRO communication with personnel with non-negative test
4. Specimen transportation from point of collection to the USA
5. Entry of specimens into USA





International Issues

Specimen collection

Personnel DOT qualified to do collections

Use of local clinics to collect specimens

Often without DOT qualified collectors

Use of shipboard personnel to collect

Training to be done

Personnel transfer

Retraining of personnel

How to address collector error training



International Issues

Collection Facilities and Collection Supplies

Having adequate supplies, i.e., CCFs, specimen collection kits, available at all times

Shipping problems to isolated areas

Secure storage for collection kits





International Issues

MRO Communication Issues

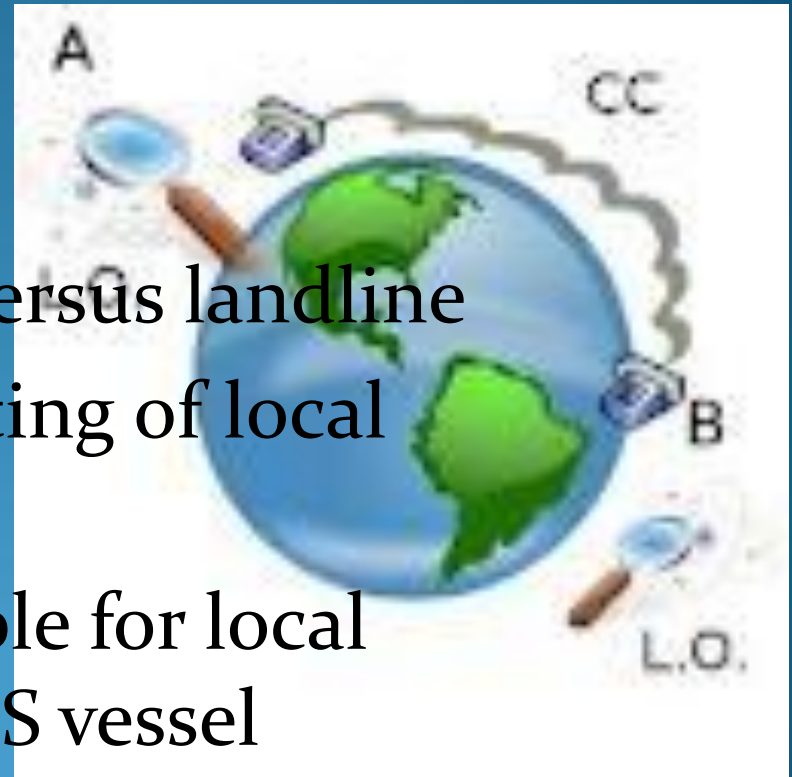
Location of MRO in relation to vessel location

Time differences

Wireless communication versus landline

Language barriers with testing of local vessel personnel

Use of medications allowable for local personnel and not for US vessel personnel





International Issues

Specimen Transportation To United States

Will the country where vessel is located allow specimen(s) to be shipped?

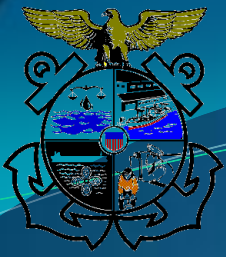
Packaging

Can specimens be shipped by overnight air

Storage temperature until shipped

Time in transit until arrival in United States





International Issues

Specimen Entry Into United States

Port of entry issues

Customs clearance delays, storage temperature

Proper packaging

Use of Public Health Service Permit will
facilitate entry into United States

Have encountered delays on prior shipments

Effect of delays on specimen integrity



STCW 2010

International Convention on Standards of Training, Certification and Watchkeeping for Seafarers

- STCW
 - Adopted in 1978
 - Amended in 1995 and 2010 (Manila Amendments)
- Must be implemented by January, but most countries are behind in timeline





STCW 2010 and Fitness for Duty



Reg. VIII/1(2)

Requires implementing adequate measures to prevent drug and alcohol abuse

Section A-VIII/1

.05% BAC or equivalent standard

Section B-VIII/1:

Demands those under the influence be relieved of duties

Encourages a program that identifies drug and alcohol abuse.





Thank You for Listening

Questions and How to Reach Me

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