



# The Canadian Merchant Service Guild

A NATIONAL ASSOCIATION OF MASTERS - MATES - PILOTS - ENGINEERS AND OTHER MARINE OFFICERS

## La Guilde de la Marine Marchande du Canada

ASSOCIATION NATIONALE DES CAPITAINES - OFFICIERS DE PONT - PILOTES - MÉCANICIENS ET AUTRES OFFICIERS MARINS

AFFILIATED WITH / AFFILIÉE À

INTERNATIONAL MARITIME PILOTS' ASSOCIATION - INTERNATIONAL TRANSPORT WORKERS' FEDERATION - NATIONAL JOINT COUNCIL OF CANADA  
ASSOCIATION INTERNATIONALE DES PILOTES MARITIMES - FÉDÉRATION INTERNATIONALE DES OUVRIERS DU TRANSPORT - CONSEIL NATIONAL MIXTE DU CANADA

**OTTAWA - VANCOUVER - THOROLD - QUÉBEC - DARTMOUTH - ST. JOHN'S**

February 15, 2018

Elisabeth Bertrand

A/Director, Marine Personnel Standards, Pilotage and Medicine  
Transport Canada, Marine Safety and Security  
Place de Ville - 330 Sparks Street  
Ottawa, ON K1A 0N5

### **Re: Update of Marine Personnel Regulations**

Dear Ms. Bertrand,

The Canadian Merchant Service Guild is the labour and safety representative for thousands of the marine officers employed on ships and tugs across the country. The Guild is affiliated with the International Transport Workers Federation (ITF).

At meetings in Ottawa of the Canadian Marine Advisory Council (CMAC), since 2010, labour representatives affiliated with the ITF, including the Guild, have raised our concerns, in this era of reduced crew sizes, of the vital importance of being able to recover a “man-overboard”.

In Part 2 “Crewing” of the Marine Personnel Regulations (MPR’s), Division 2 already specifies many important factors which contribute to determining the minimum complement required on board Canadian vessels engaged in a voyage. These requirements include, in Section 207, a sufficient number of persons aboard to comply with the “hours of rest” regulations (to address fatigue) and a sufficient number of persons for other important safety considerations such as being able to operate the fire extinguishing equipment, operate the pumps, carry out an evacuation and Section 206 even requires that each crew member be able to effectively perform their duties related to prevention and mitigation of pollution. These are all important safety considerations.

We have been advised at CMAC that these MPR's which came into force in 2007 are currently under review but that no draft amendments are ready yet. Since consultation with stakeholders is underway to update these regulations, we are making the following submission:

In addition to the existing safety factors listed above in Division 2, the importance of which are all self-evident, the Guild proposes that the following safety requirement also be included in Division 2 when the MPR's are amended.

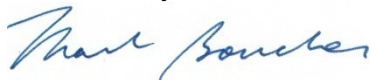
*The minimum complement of a vessel engaged in a voyage shall consist of a sufficient number of persons to carry out a recovery of a person falling overboard from the vessel.*

We are not proposing that this requirement apply to small single-person log-sorting boats which are also referred to in Section 216.3 (a) of Division 2.

Canadian seafarers employed on ships and tugs are represented by a wide cross-section of the labour community and the Guild has no particular self-interest to gain by advocating for a requirement that a sufficient complement of seafarers needs to be employed aboard all vessels for safety reasons. We are making this submission based on safety concerns received directly from seafarers employed on Canadian vessels.

We appreciate the opportunity to participate in the revision of the MPR's and to provide input on this important matter and we remain available should more information be required.

Yours truly,



Mark Boucher  
National President

Cc ITF