

# **Statement on a Commission proposal for a Council Directive on the minimum health and safety requirements for improved medical treatment on board vessels**

**(24 January 1991)**

1. The Joint Committee considers that in coming forward with a proposal on requirements for improved medical treatment on board vessels, the Commission has not taken sufficient account of the existence of internationally agreed instruments in the field.

2. In particular, the Commission has failed to recognize that international standards in the area are given in ILO Convention 164 concerning health protection and medical care for seafarers. This Convention was adopted in October 1987 with the support of Community seafarers, shipowners and governments.

3. The Joint Committee considers that the proposed Directive should include a specific reference to the Convention and that in relation to information and training of seafarers, the specific terms of the Convention should be incorporated. These provisions are specified in Articles 9.2, 9.5 and 9.6 of Convention 164 which provide three clearly defined levels of training for the seafarers involved. This would avoid any misunder-

standings or confusion as to those that should be required to undergo training and the depth of knowledge necessary.

4. The Joint Committee considers that it should be notified of any proposal which the Commission might put before the proposed advisory committee for updating or amending the Directive. This will ensure that the industry is aware of the proposal and can consult industry medical experts as to the feasibility of the proposed measures.

5. In conclusion, the Joint Committee would wish to express its regret that on an issue of such direct application and importance as medical equipment on board vessels, it was not adequately consulted by the Commission on the proposed contents, despite requests that it be so. The Committee very much hopes that such lack of consultation will not occur in the future.

6. It is noted that the Joint Committee does not represent fishermen who might be affected by this proposed Directive.

