



Please print and post at your vessel/ facility for all employees to view

Fleet Memo #53: Marine Safety Awareness Bulletin on CBD Use

Captains,

The United States Coast Guard (USCG) has issued a Marine Safety Advisory (SA 01-20) regarding the potential for a positive drug test result from use of Hemp-plant products (see attached advisory).

It should be noted that USCG states:

It remains unacceptable for any U.S Coast Guard credentialed mariner or other safety-sensitive worker working aboard a vessel that is subject to U.S Coast Guard drug testing regulations to use THC. Claimed use of hemp products or CBD products is not an acceptable defense for a THC- positive drug test result.

TDI-Brooks drug and alcohol policy aligns with USCG (TDI SMM Chapter 13 section 2.0). TDI has a zero tolerance policy for drugs and alcohol, and a positive test for THC will result in disciplinary action up to and including termination of employment.

ACTION ITEMS:

- Please print and post the marine advisory (along with this memo) prominently aboard the vessel.
- Review this memo and the marine advisory with the full crew at the next safety meeting, and have every crewmember sign the meeting sheet as proof they have been informed and understand the marine advisory and TDI's drug and alcohol policy
- Send the meeting minutes and sign in sheet to the HSE department hse@tdi-bi.com

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UNITED STATES COAST GUARD
U.S. Department of Homeland Security

MARINE SAFETY ADVISORY

Inspections and Compliance Directorate

February 10, 2020
Washington, DC

Safety Advisory 01-20

Potential for Positive Drug Test Result from Use of Hemp-Plant Products

This Marine Safety Advisory is to ensure that mariners, marine employers, and sponsoring organizations are aware that some products marketed as hemp or cannabidiol (CBD) may contain enough tetrahydrocannabinol (THC) to cause a positive drug test. In accordance with 46 CFR 16.201(c), an individual who fails a chemical test for dangerous drugs must be removed from duties directly affecting the safe operation of the vessel, and is subject to suspension and revocation proceedings against his or her credential under 46 CFR part 5. Use of hemp or CBD products is not accepted as an affirmative defense (acceptable excuse) against a THC-positive drug test result. For these reasons, mariners wishing to avoid a positive THC drug test result should exercise extreme caution when considering the use of any hemp or CBD product because such use could result in the loss of their merchant mariner credential and immediate removal from safety sensitive duties aboard a vessel. This warning applies to hemp and CBD products in any form, including those that are taken by mouth and those that are applied to the skin.

THC is the primary psychoactive component of the Cannabis sativa plant. Hemp and marijuana are different strains of the Cannabis sativa plant and both contain varying concentrations of THC and CBD. THC is considered a dangerous drug because it produces an intoxicating effect on the user and poses safety-risks to vessel operations. The U.S. Coast Guard prohibits THC use by mariners because of its known debilitating effects, and all U.S. Coast Guard-required drug tests screen mariners for use of THC.

Recent changes to Federal and State laws have resulted in a surge in the availability of over-the-counter hemp products and CBD products throughout the United States. Hemp products and CBD products are marketed to the general public in several forms such as food and medicinal products, dietary supplements, oils, cosmetics, and hair products. In some cases, product manufacturers market these products as low in THC, or THC-free. Mariners should be aware that over-the-counter hemp products and CBD products have not been approved as medications by the U.S. Food and Drug Administration (FDA) and are not regulated by the FDA. Therefore, users lack federal assurances of their ingredients, THC-content, quality, effectiveness, or safe use. As a result, mariners using these products put themselves at risk of having a THC-positive drug test result.

It remains unacceptable for any U.S Coast Guard credentialed mariner or other safety-sensitive worker working aboard a vessel that is subject to U.S Coast Guard drug testing regulations to use THC. Claimed use of hemp products or CBD products is not an acceptable defense for a THC-positive drug test result.

To learn more about the risks of hemp and CBD products visit the FDA website at <https://www.fda.gov/consumers/consumer-updates/what-you-need-know-and-what-were-working-find-out-about-products-containing-cannabis-or-cannabis>.

This Safety Advisory was developed by the U.S. Coast Guard Office of Investigations and Analysis. Questions or comments should be sent to: DAPI@uscg.mil.