

IMCA Policy for the Validity of Diver Medicals During the COVID-19 Pandemic – Rev.2.1

This Information Note supersedes Information Note IMCA D 19/20 *IMCA Policy for the Validity of Diver Medicals During the COVID-19 Pandemic – Rev. 1* which is withdrawn.

It is IMCA Members' responsibility to conduct their operations safely and in compliance with all applicable national laws and regulations.

A. Background

Section 6.4 of the *IMCA International Code of Practice for Offshore Diving* (IMCA D 014) requires that all divers at work must have a valid certificate of medical fitness to dive issued by a suitable doctor, i.e. by a Medical Examiner of Divers (MED) considered competent to conduct diver medicals to the standard cited in *IMCA D 20/01*.

IMCA D 014 states that the certificate of medical fitness to dive must be renewed prior to expiring if a diver wishes to continue diving at work. The certificate of medical fitness to dive is a statement of the diver's fitness to perform work under water and is valid for as long as the doctor certifies, normally up to a maximum of 12 months.

B. Former IMCA Policy for the Validity of Diving Medicals During the COVID-19 Pandemic

In March 2020 IMCA D 11/20 stated that IMCA Members may accept the validity of current certificates up until 30 June 2020 provided that the diver's current certificate of medical fitness was issued with a full 12 months' validity. The guidance came into effect for certificates expiring on or after 16 March 2020.

In June 2020 IMCA D 11/20 was withdrawn in favour of IMCA D 19/20 *IMCA Policy for the Validity of Diver Medicals During the COVID-19 Pandemic – Rev. 1*. This document stated that Members may accept the validity of current certificates up until 14 August 2020 provided that the diver's current certificate of medical fitness was issued with a full 12 months' validity. Again, the guidance came into effect for certificates expiring on or after 16 March 2020.

C. Present IMCA Policy for the Validity of Diving Medicals During the COVID-19 Pandemic

IMCA has now undertaken a review of its policy on the validity of diving medicals during the ongoing COVID-19 outbreak. IMCA's current policy on the issue is as follows.

It is IMCA Members' responsibility to conduct their operations safely and in compliance with all applicable national laws and regulations. A number of countries in the world have national regulations, codes and/or standards which apply to medical fitness for diving at work. These must always be complied with.

Short Term Policy

If a diver is unable to undertake a medical re-examination with a competent MED for reasons associated directly with coronavirus or as a result of complying with related national government advice, IMCA will not consider Members to be in breach of IMCA D 014 should they choose to accept the validity of expired certificates up to and including **14 August 2020**¹ provided that:

- the relevant diver's certificate of medical fitness was issued with a full 12 months validity;
- the relevant diver's certificate of medical fitness expired on or after 16 March 2020²;

¹ IMCA will not consider Members to be in breach of IMCA D 014 should they choose to accept the validity of such medical certificates for the full duration of a 28-day saturation that commences on or before 14 August 2020.

² Any diver whose certificate expired prior to 16 March 2020 must undertake the full examination as required by IMCA D 014.

- c. the Member is satisfied that despite best efforts it has not been possible for the relevant diver to undergo a medical examination carried out by a competent MED and the relevant diver is able to demonstrate the steps that they have taken to try to obtain a medical examination;
- d. the relevant diver confirms that they have not been diagnosed with or suffered any illness or injury that could impact on their medical fitness to dive.

If there is any doubt about a diver's medical fitness, the Member concerned should seek further advice from its competent specialist diving medical support organisation.

Normalisation Policy

Members cannot keep accepting the validity of expired certificates indefinitely. After **14 August 2020**³ IMCA's advice to its members will be not to accept any certificate of medical fitness to dive which has passed the expiry date set by the MED.

Diving contractors and divers should note this normalisation of diving medical validity and take appropriate steps to ensure that after **14 August 2020** Section 6.4 of the [IMCA International Code of Practice for Offshore Diving](#) (IMCA D 014) is observed.

D. Assessment of Fitness for Commercial Diving during the ongoing Covid-19 Pandemic

In a world where the threat of SARS-CoV-2 infection and novel Coronavirus disease is ever-present, IMCA recommends that diving contractors, medical examiners of divers, and divers follow the recommendations set out by the Diving Medical Advisory Committee (DMAC) in [DMAC 33 Return to Diving after COVID-19](#). The main aims of this document are to provide information and guidance to the offshore energy diving industry on:

- ◆ the return of divers to commercial offshore surface supplied and saturation diving after confirmed or suspected Covid-19; and
- ◆ the assessment of fitness for diving duties of asymptomatic offshore commercial divers during the ongoing Covid-19 pandemic.

The assessment of asymptomatic divers is necessary to identify potential pulmonary changes in those who contracted the disease but were symptom free.

The guidance contained in [DMAC 33](#) should be read in combination with IMCA's published information and guidance on COVID-19 (available [here](#)). IMCA's core Diving Division document on the subject of COVID-19 is [IMCA D 06/20 Novel Coronavirus \(COVID-19\) – Guidance for Diving Contractors](#).

E. Concerns About the Availability of MEDs to Provide Face-to-Face Diving Medical Examinations

There is understandable concern that some divers may be unable to find a MED available to provide a face-to-face full medical examination. While it is true that during the COVID-19 outbreak some medical examiners of divers have ceased conducting face-to-face full medical examinations, IMCA is aware that other MEDs have identified and implemented appropriate risk control measures and are still offering this service.

[DMAC 34 Guidance for medical examiners of divers conducting face-to-face medicals during the COVID-19 pandemic](#) provides advice on how medical examination and assessment of commercial divers may be done adequately and with a low risk of transmission/infection during the Covid-19 pandemic. The guidance contains advice for Medical Examiners of Divers on risk assessment of clinical examinations, spirometry and exercise testing, and how infection risk can be managed. DMAC 34 concludes as follows:

It is DMAC's view that, following an appropriate risk assessment and with adequate controls in place, the medical examination and assessment of commercial divers can be conducted safely, with a low risk of

³ IMCA will not consider Members to be in breach of IMCA D 014 should they choose to accept the validity of such medical certificates for the full duration of a 28-day saturation that commences on or before 14 August 2020.

infection. At the time of writing of this document, the current situation with respect to the Covid-19 pandemic warrants full medical examinations of divers including lung function and exercise testing

If a full face-to-face medical examinations cannot be undertaken by competent medical examiners of divers, it remains the responsibility of Members and their clients to consider suitable alternative arrangements. In all cases, the health, safety and welfare of the divers must be paramount.