Κανονιστικό Πλαίσιο: Κριτήρια επιλογής σημαίας, έλεγχοι Port State Control

Πως επηρεαζουν τα vetting inspections και το TMSA.

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OCIMF

The **Oil Companies International Marine Forum** (OCIMF) is a voluntary association of oil companies having an interest in the shipment and terminalling of crude oil and oil products.

OCIMF was formed in London on April 1970 after the accident of Torrey Canyon in 1967, as the oil industry's response to increasing public awareness of marine pollution.

After the M/T Erika accident In 1999 that polluted Biscay with 20,000 tonnes of oil, the need emerged for oil companies to change completely the way with which they charter tanker ships, taking into consideration not only ship condition, but also the way the managing company designs and implements it safety management system.

OCIMF

The role of OCIMF is determinant in that it poses high standards in the management and maintenance models of shipping companies, leading to
- reduced numbers of accidents,

- The establishment of commonly accepted principles and rules in the training of vetting inspectors

- Reduced number of inspections each ship is subject every year, therefore reducing the burden on the seamen.

SIRE - VIQ

In 1993, OCIMF established a Ship Inspection Report (SIRE) Program, which enabled OCIMF members to submit their ship inspection reports to OCIMF for distribution to OCIMF members and certain qualifying non-OCIMF members.

The basis of the SIRE program is the process of vessels' inspections from vetting inspectors.

It is not mandatory from any legislation or regulations; however it is essential for a vessel to be eligible to transport oil cargos on behalf on a oil company.

Usually a vessel goes through a SIRE inspection 2-4 times a year.

SIRE - VIQ

Vessel Inspection Procedure

The procedure involves an *Inspection* followed by a *Report*.

During the SIRE **Inspection**, a standardized questionnaire is used, the VIQ (Vessel Inspection Questionnaire). The questionnaire addresses issues associated with safety and pollution prevention.

The **Report** is developed from the completed electronic questionnaire and when concluded it will be uploaded in the SIRE database and will become available to all OCIMF members as well as the prospective charterers of the vessel.

SIRE - VIQ

VIQ covers all sections and aspects of a vessel's and its crew activities, such as maintenance, loading & discharging operations, certificates etc

Chapter 1. General Information

Chapter 2. Certification and Documentation
Chapter 3. Crew Management

Chapter 4. Navigation
Chapter 5. Safety Management

Chapter 6. Pollution Prevention
Chapter 7. Structural Condition

Chapter 8. Cargo and Ballast Systems - Petroleum
Chapter 8. Cargo and Ballast Systems - Chemicals

Chapter 8. Cargo and Ballast Systems - LPG
Chapter 8. Cargo and Ballast Systems LNG

Chapter 9. Mooring
Chapter 10. Communications

Chapter 11. Engine and Steering Compartments

Chapter 12. General Appearance and Condition
Chapter 13. Ice Operations

TMSA

OCIMF's Tanker Management & Self-Assessment (TMSA) program was introduced in 2004 as a tool for managing shipping companies to evaluate, assess and improve their safety management systems.

In 2008 the TMSA program was revised to TMS2, aiming to update the content and incorporate all legislation changes that had been made since its initiation, and also to include all new optimal practices.

In February 2017 TMSA was integrated and embedded into a new integrated SIRE/TMSA programme and TMSA2 was superseded by TMSA3 in April 2017.

TMSA

The following are the 13 TMSA3 elements:

Element	Topic	Main Requirements
1	Management	Planning and Business Intelligence
2	Shore Personnel	Management Assessments Training Requirements
3	Vessel Personnel	Officer Competency Assessments and Appraisals Training Requirements D&A Audits/Health Audits
4	Vessel Maintenance	Audits & Inspections Equipment Defects and Reliability Maintenance Risk Assessments
5	Navigation	Navigational Audits
6	Cargo & Mooring	Cargo Audits Mooring Audits
7	Management of Change	Risk Assessments
8	Incidents	Incident Analysis
9	Safety	Risk Assessments Safety Inspections
10	Environmental	Environmental and Energy Measurement and Analysis
11	Emergency Planning	Contingency Planning and Exercises
12	Measurement and Analysis	Non Conformity Analysis Remedial Actions Performance
13	Security	Risk Assessments

The link between Flag-PSC-VIQ and TMSA
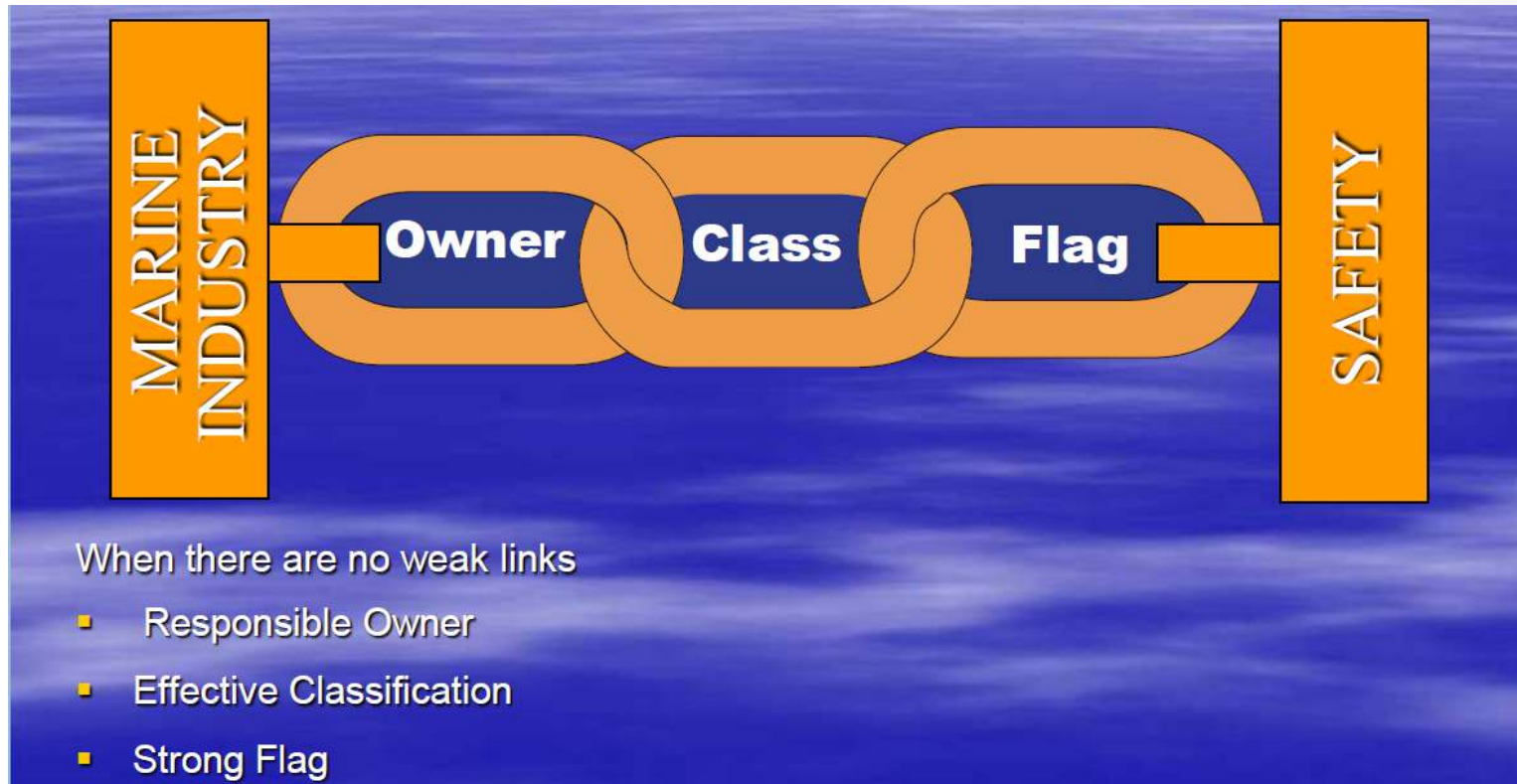
The link between Flag-PSC-VIQ and TMSA

RANK	FLAG	INSPECTIONS 2015-2017	DETENTIONS 2015-2017	BLACK TO GREY LIMIT	GREY TO WHITE LIMIT	EXCESS FACTOR
WHITE LIST						
1	France	258	0	25	11	-1.89
2	Cayman Islands, UK	438	2	40	21	-1.84
3	Netherlands	3,028	35	236	188	-1.83
4	Denmark	1,189	12	98	68	-1.79
5	United Kingdom	1,194	13	99	69	-1.76
6	Norway	1,429	17	116	84	-1.75
7	Italy	1,087	12	90	62	-1.74
8	Bahamas	2,239	30	177	136	-1.73
9	Isle of Man, UK	694	7	60	37	-1.71
10	Singapore	1,887	27	151	113	-1.68
11	Sweden	316	2	30	14	-1.66
12	Marshall Islands	4,022	68	309	254	-1.65
13	Hong Kong, China	1,997	31	159	121	-1.64
14	Belgium	220	1	22	9	-1.59
15	Germany	588	8	52	30	-1.52
16	Ireland	120	0	13	3	-1.41
17	Cyprus	1,921	44	153	116	-1.36
18	Gibraltar, UK	716	14	62	38	-1.32
19	Liberia	4,105	110	315	260	-1.29
20	Finland	408	7	38	20	-1.26
21	Luxembourg	199	2	20	8	-1.24
22	China	198	2	20	7	-1.24
23	Malta	4,681	135	357	298	-1.23
24	Greece	903	22	76	50	-1.18
25	Bermuda, UK	243	4	24	10	-1.04
26	Estonia	90	0	11	2	-1.04

The number of flags that are in this list is 40.

The link between Flag-PSC-VIQ and TMSA

Grey List

RANK	FLAG	INSPECTIONS 2015-2017	DETENTIONS 2015-2017	BLACK TO GREY LIMIT	GREY TO WHITE LIMIT	EXCESS FACTOR
GREY LIST						
41	Kazakhstan	66	1	9	1	0.04
42	Algeria	83	2	10	1	0.06
43	United States of America	203	9	21	8	0.10
44	Russian Federation	1,182	71	98	68	0.11
45	Thailand	53	1	7	0	0.12
46	Lithuania	123	5	14	3	0.15
47	Switzerland	119	6	13	3	0.27
48	Libya	32	1	5	0	0.28
49	Egypt	43	2	6	0	0.34
50	Saint Vincent and the Grenadines	557	36	49	29	0.36
51	Morocco	57	3	8	0	0.37

The number of flags that are in this list is 20.

The link between Flag-PSC-VIQ and TMSA

Black List

RANK	FLAG	INSPECTIONS 2015-2017	DETENTIONS 2015-2017	BLACK TO GREY LIMIT	GREY TO WHITE LIMIT	EXCESS FACTOR
BLACK LIST						
61	Belize	399	40	37		1.24
62	Cook Islands	414	43	38	Medium Risk	1.36
63	Vanuatu	251	28	25		1.38
64	Cambodia	161	22	17		1.85
65	Saint Kitts and Nevis	266	35	26		1.98
66	Sierra Leone	292	46	28	Medium to High Risk	2.80
67	Ukraine	94	18	11		2.98
68	Palau	180	36	19	High Risk	3.77
69	Moldova, Republic of	480	89	43		3.90
70	Tanzania United Rep.	259	53	25		4.16
71	Togo	422	85	39	Very High Risk	4.34
72	Comoros	282	60	27		4.46
73	Congo, Republic of the	104	28	12		5.33

The number of flags that are in this list is 13.

The link between Flag-PSC-VIQ and TMSA

Recognized Organization performance table 2015-2017

Recognized Organization	RO abrev	Inspections	Detentions	Low/medium limit	Medium / high limit	Excess Factor	Performance level
American Bureau of Shipping	ABS	5.866	2	135	99	-1.95	HIGH
Lloyd's Register	LR	12.554	9	277	225	-1.91	
DNV GL AS	DNVGL	16.014	16	350	291	-1.88	
Bureau Veritas	BV	11.376	23	253	202	-1.76	
Korean Register of Shipping	KRS	1.142	1	31	15	-1.75	
RINA Services S.p.A.	RINA	4.071	10	97	66	-1.65	
Nippon Kaiji Kyokai	NKK	8.305	24	188	145	-1.64	
China Classification Society	CCS	834	1	24	10	-1.58	
Turkish Lloyd	TL	525	1	16	5	-1.00	
Russian Maritime Register of Shipping	RMRS	3.033	22	74	47	-0.96	
Phoenix Register of Shipping	PHRS	353	2	12	2	-0.10	MEDIUM
International Naval Surveys Bureau	INSB	576	6	18	5	0.04	
Indian Register of Shipping	IRS	95	0	5	0	0.15	
Polski Rejestr Statkow (Polish Register of Shipping)	PRS	484	6	15	4	0.17	
Panama Maritime Documentation Services	PMDS	153	1	6	0	0.19	
Croatian Register of Shipping	CRS	146	1	6	0	0.21	
Panama Register Corporation	PRC	66	0	4	0	0.22	
Isthmus Bureau of Shipping, S.A.	IBS	125	2	6	0	0.42	
Other	OTHER	324	6	11	2	0.45	
Macosnar Corporation	MC	98	2	5	0	0.51	
Dromon Bureau of Shipping	DBS	477	10	15	4	0.54	
Overseas Marine Certification Services	OMCS	83	2	4	0	0.57	
Maritime Lloyd - Georgia	ML	145	5	6	0	0.82	
Mediterranean Shipping Register	MSR	104	4	5	0	0.84	
Maritime Bureau of Shipping	MBS	102	4	5	0	0.85	
Register of Shipping (Albania)	RSA	65	3	4	0	0.86	
Intermaritime Certification Services, ICS Class	ICS	152	6	6	0	0.94	
Bulgarian Register of Shipping	BRS	257	9	9	1	0.96	
Columbus American Register	COLAMREG	69	4	4	0	1.19	LOW
Venezuelan Register of Shipping	VRS	159	7	7	0	1.19	
National Shipping Adjuster Inc.	NASHA	177	9	7	0	1.78	
International Register of Shipping	IS	298	16	10	1	2.46	
Shipping Register of Ukraine	SRU	556	28	17	5	2.64	VERY LOW
Panama Shipping Registrar Inc.	PSR	75	6	4	0	2.74	

The link between Flag-PSC-VIQ and TMSA

VIQ7 mentions 31 times the word "flag" and "13" times the phrase "Port State Control".

In the following slides is presented a list of questions from VIQ and TMSA with a direct link /impact to PSC and/or flag administration

The link between Flag-PSC-VIQ and TMSA

VIQ Reference to the flag administrator:

- **1.6 Flag:** *If a change of flag has taken place within the past 6 months*
- **2.1.14 Maritime Labour Convention (2006)** *The MLC shall be supplemented by DMLC Part I issued by Flag Administration*
- **2.1.15 Ballast Water Management Certificate.** *Effective 08 Sept 2017 on completion of an initial survey, an International Ballast Water Management Certificate will be issued for a ship whose flag has ratified the BWM Convention;*
- **2.10** *e-ORB oil record book logs are being accepted by a number of flag states…*
- **2.13** *Ships that are registered with flag administrations that are not yet a party to the Convention will need to demonstrate compliance and may wish to undergo surveys and be issued with a document of compliance.*
- **3.2** *Are the STCW and flag Administration's regulations that control **hours of work** to minimise fatigue …*
- **3.5** *If the **officers' certificates** are not issued by the same Administration as the flag State of the vessel…*
- **4.12** ***Publications** in electronic format may be accepted by certain flag …*
- **4.17** *Are the master and deck officers aware of the requirements of Electronic Chart Display and Information System (**ECDIS**) and does the system fitted meet SOLAS and flag state requirements?*
- **4.23** *The requirements relating to the retention of **radio logs** are determined by the flag State …*
- **5.14** *Are the crew familiar with their duties during lifeboat and fire **drills** and are drills being performed effectively and on a frequency meeting SOLAS and flag state requirements?*
- **5.44** *Flag states may have additional requirements for the provision and location of **EEBD's**.*
- **7.1** *Vessel shall have a Flag State approval letter or an endorsement stamp on the Ship Security Plan (**SSP**).*

The link between Flag-PSC-VIQ and TMSA

VIQ Reference to the Port State Control

- **1.21** *Date of the last* port State control inspection.

- **1.22** *Port of the last* Port State Control inspection.

If the vessel was detained, or if significant deficiencies were listed, record the reason for the detention or the nature of those deficiencies in comments.

Inspection Regime and ships will be subject to inspection on the basis of 'Ship Risk Profile' in conjunction with the 'Company Performance. Ships will be categorized as either 'Low Risk Ships (LRS)', 'Standard Risk ships (SRS) or 'High Risk ships (HRS)' taking into account various factors including company performance, the risk rating of the ship will determine its inspection frequency.

The link between Flag-PSC-VIQ and TMSA

TMSA3 Reference to the flag administrator:

- **El.3.1.2** *All vessel personnel have valid **medical certificates** in compliance with Flag State …*

- **El. 3A1.1** *Procedures ensure that each vessel is appropriately manned in order to maintain safe operation onboard. Documentary evidence of **manning level** assessments is kept. This may include:• Flag State and/or national requirements.*

- **El. 3A1.3** *Procedures ensure that **working and rest hours** of all personnel are in line with the STCW, applicable Flag State requirements…*

- **El. 3A2.1** *A defined **complaints procedure** is in place. The procedure complies with applicable flag and national requirements …*

- **El. 3A2.2** *A documented **disciplinary procedure** is in place. The disciplinary procedure is in compliance with Flag and contractual requirements …*

- **El.8.1.2** *The reporting and investigation procedures ensure that all **mandatory notifications** are carried out within the required time frame. Examples of mandatory reports include notifications to Flag State.*

- **El.13.1.4 *Security*** *information is obtained by the company from appropriate sources that may include Flag State.*

The link between Flag-PSC-VIQ and TMSA

TMSA3 Reference to the Port State Control:

- **El.1.3.1** *Shore management establishes **targets** related to HSSE performance and conducts measurements to assess and verify their implementation. Typical assessment measures may include setting KPIs, for example: Number and nature of inspection findings, e.g. SIRE, PSC, CDI.*

- **El.4.1.2** *A **defect reporting system** is in place for each vessel within the fleet. The defect reporting system includes: Recording of any equipment failures or breakdowns including those identified by third parties, e.g. SIRE, PSC, CDI and barge inspection schemes.*

- **El.5.4.2** *All **navigational assessment and audit reports** from the fleet are analysed, trends identified and improvement plans are developed. Compares external inspections, e.g. SIRE/PSC.*

- **El.8.1.2** *The reporting and investigation procedures ensure that all **mandatory notifications** are carried out within the required time frame. Examples of mandatory reports include notifications to: Coastal Authorities and/or Port State.*

The link between Flag-PSC-VIQ and TMSA

Challenges are many and more will come in the future.

Annual statistics can prove how you can negative impact your vessel with a wrong decision on flag & poor management.

The domino effect will start from:

- Negative results in PSC inspections,

- A vetting inspector will board knowing that your vessel has a black listed flag and poor records in PSC you will need to place extreme effort to convince him for the contrary.

- The domino effect will finally reach the head office with your KPIs in a continues descending trend and your efforts of continues improvement to drop down.

Proper decision on the right time

or

be prepared to deal with the increased possibility of negative results!

THANK YOU!