

CMMI Meet Held to Understand the ISM and SIRE 2.0

The Company of Master Mariners of India (CMMI) held its monthly meet on August 17, 2023 to discuss the nuances of International Safety Management (ISM) and Ship Inspection Report Programme (SIRE) 2.0

While Capt Sudhir Subhedar - Fellow, CMMI, made his presentation on nuances of ISM Code, Capt Girish Lele, an accredited SIRE CAT 1 Oil & Gas inspector & Member, CMMI, discussed in detail the SIRE 2.0 programme.

Nuances of ISM

The International Management Code for the safe operation of ships is a management system implemented to ensure the safety of life and property at sea and marine environment protection from pollution. Known as the International Safety Management Code, the ISM Code is one of the regulations in the marine industry. From the year 1994, it has been a vital component of the SOLAS Convention (Safety of Life at Sea). It was in this year that this code was formally adopted and integrated as a part of the SOLAS Convention.

The ISM Code in its current form was adopted in 1993 by resolution A.741 (18) and was made mandatory with the entry into force, on 1 July 1998, of the 1994 amendments to the SOLAS Convention, which introduced a new chapter IX into the Convention.

However, it was observed that due to poor practices of shipowners, ISM had been only 40% successful in reversing the trend of lack of safety culture. For successful implementation of any management system there needs to be a robust top-to-down approach. At the time of adopting ISM, the Secretary General of IMO, Mr. O'Neil had observed that safety cannot be left to chance, it has to be managed.

"Freedom from danger".

There has to be greater awareness, followed with adequate training and risk assessment, for which there has to be regular inspections/audits and one could not use the 'one size fits all' approach.

Talking further about ISM manuals, Capt Sudhir Subhedar said "ISM manuals are broad guidelines focusing on objectivity, functional requirements."

The ISM code is divided into two main parts – Part A and Part B. While Part A provides the requirements for the implementation of the code and consists of 14 elements, Part B provides guidance for ISM certification and verification. It consists of four elements.

Typically the 12 elements in Part A are; General, Safety and environmental protection policy, Company responsibilities and authority, Designated person(s), Master's responsibility and authority, Resources and personnel, Shipboard operations, Emergency Preparedness, Reports and analysis of non-conformities, accidents and hazardous occurrences, Maintenance of ship and equipment, Documentation, Company verification, review and evaluation.

Whereas the four elements in Part B are: Certification and Periodical Verification, Interim Certification, Verification, Forms of Certificates.

It applies to all vessel types such as oil tankers, chemical tankers, car carriers, gas carriers, container vessels, passenger ships, bulk carriers, and even Mobile Offshore Drilling Units (MODU).

The onus of meeting these objectives is on the Company that manages the operation of ships and communications is the key to meet the ISM objectives.

SIRE 2.0

Capt Girish Lele before starting his presentation categorically clarified that his opinions were personal, based on his experience and training. As we know The Ship Inspection Report programme (SIRE) is a unique tanker and barge risk assessment tool used by charterers, terminal operators and government bodies to assist in the assurance of ship safety standards.

The Oil Companies International Marine Forum (OCIMF), the governing body behind SIRE realized in 2017 that the impact of SIRE inspections under the Vessel Inspection Questionnaire (VIQ) format while having achieved considerable success in reducing accidents on oil and gas vessels was beginning to lose its value as statistics showed the trend of accidents/incidents to have flat lined or in some cases rising again.

This demanded a complete revision of the programme and eventually resulted in SIRE 2.0 which had now completed phase 3 of the 4 phases of implementation before being rolled out to the industry.

There have been major changes in the programme. Accordingly inspectors will now use a tablet to electronically record observations with the Ship-specific set of questions, called Compiled Vessel Inspection Questionnaire (CVIQ).

Inspectors have to be appointed at least 48 hours in advance where their tablets are loaded with preliminary data about the vessel (CVIQ) including specific photos showing the present condition as well as any relevant data from previous inspections which OCIMF has deemed necessary. The information will be ship specific thereby reducing or eliminating the number of NA or NS responses. Operators are also encouraged to record all defects and their mitigating measures so that these do not appear as observations once verified by the inspector.

While the time for the inspection remains the same (8-10 hours), the time for perusing documentation will now be done before boarding.

The CVIQ will have four types of questions viz; Core, Rotational, Conditional and Campaign. The meaning of the words is self explanatory though the 'Rotational' questions have a time frame for repetition or change.

Also one of the major changes is to include Human Factors or human element into the programme.

Another major change in the recording of observations has been that there will be both binary (YES/NO) and Graduated observations(Better than expected, As expected, largely as expected and not as expected).

No comments are required when the answer is "As expected".

The above gives motivation to the ships staff to encourage the inspector to provide "Better than expected" responses. The programme also provides vetting screeners in the oil companies to have a better picture of the vessel and its management to make more informed chartering/operating decisions.

The programme is meant to change the prevailing confrontational approach to the SIRE inspector to a more inclusive and proactive approach towards safety and not based on the "number" of observations as a basis for rejecting or acceptance of a vessel.

The new vessel inspection regime, SIRE 2.0, will more accurately report on the quality of a vessel and its crew (on an ongoing basis) and indicate future likely performance, using enhanced tools, strengthened governance processes and more in-depth reporting outcomes, following a risk-based approach.