VETTING INSPECTIONS - EFFECTIVE PREPARATION AND AN INSPECTOR’S PERSPECTIVE

Thursday, 20th March 2014

Police Officer’s Club, Hong Kong
- What is a vetting inspection?
- Why is it done?
- How important is it for a ship Owner or a ship manager to ensure that a vetting inspection is successful?
- How does a poor vetting inspection affect the commercial operation of the vessel and sometimes the entire fleet?
- What can the ship’s staff or ship manager do to ensure a successful vetting inspection?
- What is the expected involvement of the ship’s staff?
- Does the presence of a superintendent affect the outcome of a vetting inspection?
- How does a vetting inspector react to different situations?
- Areas where observations or deficiencies are found
- How does a ship Master deal with a vetting inspector?
WHAT IS A VETTING INSPECTION?

An inspection carried out on a vessel to assess the extent to which a vessel, its staff and its management’s comply with international legislation and industry standards, in order to enable a prospective charterer to determine the suitability of a vessel to carry their cargoes.

Vetting inspections are usually carried out at the request of a ship operator or owner, who wishes to present his or her vessel for assessment.

Vetting inspections are carried out on many types of vessels – tankers, bulk carriers, offshore units including oil rigs, offshore supply vessels, crew boats, accommodation barges, tugs, bunker barges, packaged goods barges etc.

These inspections are commissioned by various parties – OCIMF SIRE submitting members, CDI, Rightship (for bulk carriers) and P & I Clubs
Why Vetting?

To avoid this.....
this....
Definitely this....
And it might be a good idea to avoid this too...
You have to wonder...
And just so you know it is not just tankers.....
Vetting – commercially critical or a waste of time?

Is vetting compulsory?

In a shipping market where charterers can pick and choose from a surplus of vessels, it is especially important that commercial teams have available a fleet of vessels with sound vetting records and full vetting acceptance by the oil majors and other customers.

Certain charter parties, especially in the chemical trade, include a vetting and inspection clause...

**BIMCHEMTIME:** “Owners declare that the Vessel has been vetted and is, to the best of their knowledge, acceptable on a case-by-case basis by:.....”
“If the Vessel, despite the exercise of due diligence, fails to obtain or retain acceptances by any of the companies listed in sub-clauses (a)(i), (ii) and (iii) above or the minimum CDI score stated in sub-clause (f), then the hire shall be reduced by the amount of ____ per day for each company’s non-acceptance and/or while the CDI score remains below the agreed minimum.”

“Should the Vessel when re-vetted or re-inspected still not obtain the acceptances required under sub-clause (a) or the minimum CDI score required under sub-clause (f), the hire shall be reduced or continue at the reduced rate as stated in sub-clause (g)(i) and the Charterers may notify the Owners that unless the situation has been rectified within 90 days, the Charterers shall have the right to cancel this Charter Party.”
Most potential ship charterers participate in or obtain information from some form of vetting protocol or another.

Risk management priorities may differ

Depending on the past experience of the customer, pollution control or structural issues may be high on the agenda of one while another may focus on crew experience or navigation.

Vetting acceptance by one party does not necessarily mean an automatic acceptance from another, but a rejection or a poor report can cause concern and raise a red flag.

A disastrous inspection can cause a customer to place the entire fleet in a company on hold.

Obviously, if this happens, it spells commercial disaster.
Preparing for a vetting inspection

Parties involved

Ship’s staff

Vessel Operator

Inspector

Local agents
Involvement of Ship’s Staff

- Liaising with agents and inspector if necessary and identity known
- Preparing vessel for the inspection
- Dealing with the inspector during the inspection
- Displaying pro-activeness during the inspection
- Assisting to expedite the inspection through good planning
Preparing the vessel

- Officers knowledge of the requirements of the questionnaire in use

- Officers knowledge of the vessel

- Officers and crew familiarity with safety equipment

- Walkabout by senior officers - more than once

- Creating a good first impression
Not a good first impression...
The Inspection

- When does it really start?

- Opening meeting – try and ensure key personnel are present

- Sequence acceptable to all? Speak up if not or if something else is preferred

- Knowing the requirements of the inspection

- Be honest with the inspector
What is your prime objective during an inspection?

Do everything you can to have the inspector on board for as short a time as possible.

The longer he stays on board, the more he will find
How does a Shipmaster achieve these goals?

Display a sound knowledge of the vessel

Be completely familiar with the safety management system

Know what areas of the vessel are prone to problems and possible deficiencies

Have the professional conviction to speak up if the inspector is wrong

Be aware and make others aware of the requirements of the inspection

Provide information that is required. Don’t overdo it.
Some causes of deficiencies

Housekeeping – lack of commitment and planning

Insufficient supervision and planning of maintenance

Poor communication – loss of information, language

Training – inadequate training of management

Procedures – poorly written – do not cover the required scope

Hardware – procurement and stock management

Design – no indication of condition

Hardware – Poor condition – wear / corrosion or circumstances

Training – insufficient management commitment

Design – practical use unknown to designer

Training – not provided or ineffective

Organisation – bad planning or co-ordination

Design – illogical layout – not in compliance

Error enforcing conditions – personality issues
Typical Spread of Deficiencies

- Deck: 30
- Operations: 45
- QA: 15
- Security: 0
- Technical: 10
Other groups of deficiencies

- Ship staff errors
- Lack of Operator support
- Vessel design features – bridge layout etc.
- Inspector error
Errors by ship’s staff

- lack of professional knowledge, lack of experience

- Eagerness to have paperwork in order leads to mistakes

- Falsification of records

- Lack of motivation, poor professional approach
The Chief Officer appeared unfamiliar with the procedures for calibration of the gas detection equipment available on board. Records of on board calibration stated that he had been calibrating this equipment once a month for the past seven months.

The managers had not provided the ship's staff with Chinese translations of important notices. While the staff's level of English was "fair", there was some inability to properly understand the language in IMO circulars such as MSC 1143 and 1014.

A review of the engine room log book indicated that there was a large disparity between the exhaust gas temperatures of units 2 and 4 of No 2 Auxiliary Engine. This difference had been recorded as being as high as 140°C. According to the Chief Engineer, this was not due to a problem with the units themselves, but was due to malfunctioning thermometers. A requisition dated 21 August 2013 for new thermometers was presented to the inspector. As per the Chief Engineer, this had not yet been supplied. However, according to engine log book entries, this problem had begun in the beginning of January 2014.
The common working language on board was English. However, it was noted that the English proficiency of the Chief Engineer and 2nd Officer could at best be described as “Poor” by industry standards. There were clear communications problems between the Master and these officers and between the 2nd Engineer and these officers. It was also noted that of the ratings on board, only two of the Able Seamen could speak English of a fair standard.

It was observed that the 2nd Engineer did not appear to be fully familiar with the starting procedure for the emergency generator.

Bridge checklists reviewed dating back to 2012 indicated that the bow and stern thrusters had been tested on each occasion that the vessel arrived and departed from ports and that the horizontal stabilizer fins had been retracted prior berthing. The vessel was a VLCC and was not fitted with any of this equipment.
Inspectors do it too....

**Observation:** The food handling space was clean however it was noted that the food served from the galley except for soup was completely cold and thus was a normal practice on the ship.

**Other inspector comments:** This was not supposed to be a cold meal.

And also nominated for the award for inane comments....

**Initial Operator Comments:**
For the lunch were served frying chicken, mashed potatoes and broccoli which normally do not need to be served hot. Additionally, inspector has delayed to take launch. However, Master has been instructed to ensure that all meals are served hot, to hold Safety Committee Meeting with this observation included in agenda and send minutes of SCM to Company as per procedures. Master has monitored cooks performance since inspection and has confirmed that all meals have been served hot. Minutes of SCM are attached.
And the award for “Best Imitation of the Keystone Cops” goes to.....
Dealing with observations – on the spot

- Challenge the observation if you know it to be incorrect. (Politely!!)

- If the inspector still insists that it is a valid observation, leave it alone

- If it is something that can be dealt with immediately, do so.
The presence of a Superintendent

- Should be as a support mechanism only.

- The inspector is not there to assess the superintendent’s level of knowledge.

- Interference by the superintendent will only serve to antagonize the inspector.
Random checks of the oxygen contents of cargo tanks carried out during the inspection revealed that these were well above 8% in most cargo tanks. Cargo tanks 2P/S, 3S, 4P/S, 6P/S, 7P/S and 8S were all found to have oxygen contents of over 14%. This was verified using a second oxygen analyser. The vessel was discharging a cargo of Jet-A1 at the time of the inspection. The inert gas system was operational with the oxygen content of the IG delivery being 4.5%.

The attending superintendent (Master Mariner) gets involved and initiates corrective action (read as “tells the Master what to do”)…the observation now becomes this….

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The Closing Meeting

- Ensure key personnel are present

- A time for discussing, not begging

- The inspector does NOT require a signed copy of the observation sheet

- Do not waste time explaining about KPIs, bonuses, potential job losses etc.

- again, if you believe the inspector has made a mistake, tell him
To summarize

1. Make sure all concerned parties are made aware of the importance of an inspection.

2. Consider logistical issues such as location, time etc.

3. Senior staff MUST make regular walkabouts on board. Do not settle for circumstantial blindness

4. Make sure you have the right people on board.

5. Be prepared to deal with an inspector who might not be having a very good day!

6. Have the professional courage and knowledge to challenge an inspector if he is making a mistake. It is for your good as well as the inspector’s!!

7. Do not attempt to cover up things or make excuses for mistakes. It will not help.

8. If you have a good, practical and experienced inspector, use the experience as a learning tool.
Questions?