

VMS MB 103 - Inspections (Second Edition)

VMS MB 103, January 2003. By Dr James Cowley
Everyday we read in the maritime press about either the continuing need for more rigorous inspections and surveys aboard vessels, or, the need to reduce the number of inspections and surveys that are carded out, or at least the need to rationalize those inspections and surveys. More regulations have come into force since our last Inspection Bulletin forcing us to review our report of safety inspection form. This revised Maritime Bulletin will attempt to address the issue of inspection and surveys in the Vanuatu fleet.

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Introduction Everyday we read in the maritime press about either the continuing need for more rigorous inspections and surveys aboard vessels, or, the need to reduce the number of inspections and surveys that are carded out, or at least the need to rationalize those inspections and surveys. More regulations have come into force since our last Inspection Bulletin forcing us to review our report of safety inspection form. This revised Maritime Bulletin will attempt to address the issue of inspection and surveys in the Vanuatu fleet.

Regulations Let's first consider the requirements for inspections from a legal standpoint. From the Vanuatu Maritime Regulations 1990, Chapter 6, Marine Inspection, we find:

- The Commissioner or Deputy Commissioner may appoint Marine Inspectors to board and examine or inspect vessels.
- It is the responsibility of owners to cooperate fully with Marine Inspectors.
- It is the duty of all holders of licenses of competence or other certification to cooperate fully with Marine Inspectors.

SOLAS, Chapter 1, Regulation 6, requires:

- The inspection and survey of ships, so far as regards the enforcement of the ... present regulations ... shall be carded out by officers of the Administration. The Administration may, however, entrust the inspections and surveys either to surveyors nominated for the purpose or to organizations recognized by it.
- The Administration shall institute arrangements for unscheduled inspections ... Such inspections shall ensure that the ship and its equipment remain in all respects satisfactory for the service for which the ship is intended. These inspections may be carried out by the Administration's own inspection services, or by nominated surveyors, or by recognized organizations, or by other Parties upon request of the Administration....

To meet this requirement Vanuatu has instituted Mandatory Annual Surveys (MAS) conducted on its behalf by IACS classification societies. Additionally, a program of inspections has been implemented, to further the interests of safety.

Paragraph (d) of Regulation 6 of SOLAS imposes an obligation on the Administration and its authorized inspectors to ensure corrective actions are taken immediately when the condition of the ship does not correspond with the particular's of a certificate, or the vessel is unfit to proceed to sea without danger to the ship or persons on board. If corrective action is not taken the relevant certificate should be withdrawn, the Administration notified, and if the ship is in the port of another Party, the appropriate Port State authorities notified. (VMS Maritime Bulletin 107 on Port State Control deals extensively with the inspection and survey process conducted by Port States.)

Definitions of Terms Let's spend a few minutes defining inspection, survey and one of today's most overused words, audit. The root word for "inspection" is "inspect" which Webster's New World Dictionary defines as:

- "to look carefully; examine critically, especially in order to detect flaws, errors, etc."
- "to examine or review ... officially"

"Inspection" is then defined as

- critical examination
- official examination...

Webster's then defines "survey" to mean:

- to examine for some specific purpose; inspect or consider carefully; review in detail
- to look at or consider, especially in a general or comprehensive way; view...

Similarly "audit" means:

- a formal, often periodic examination and checking of accounts or financial records to verify their correctness...
- any thorough examination and evaluation of a problem...

While the terms are similar, we understand them to mean entirely unique and different means of verifying a vessel's condition relative to safety. They each delineate the scope or the particular method of examination or verification: surveys-very narrowly focused but going into greater specific detail--for example, a tail shaft survey, dry-docking survey, safety construction survey, load line survey, etc.; inspections-more broad in focus, with less attention to specific detail,

covering more areas within the time allowed; and, audits-more closely focused on the paper work side, but encompassing aspects of both surveys and inspections.

Neither "survey" nor "inspection" are in fact defined by SOLAS, MARPOL, or other International Conventions although they are extensively used. Neither is "audit" defined. In quality assurance and safety management terms, an audit is the verification that prescribed procedures are being followed. Interestingly enough, classification societies' rules also do not define "surveys" or "inspections" but they do list items to be examined during the survey, thereby defining "survey" by setting the parameters of the survey. There is an anomaly in SOLAS 74 in that Regulation 12 (a) refers to "the issue of Safety Equipment Certificates and Radio Certificates after 'inspection'". Regulations 8 and 9 refer to "surveys" of safety equipment and radio installations respectively. However, all instruments since 1989 refer only to "surveys" in the context of issue or maintenance of certificates. In particular, the Harmonized System of Survey and Certification consistently refers to "surveys" and thus, in the legislative sense, on "surveys" for Certificates.

Nevertheless, for the purposes of this Bulletin "surveys" are more detail oriented, narrowly focused examinations. "Inspections" are more general purpose, with less attention to the minute detail. For example, during a Vanuatu Marine Safety inspection, the inspector will not necessarily inspect every fire hose, fire extinguisher, life buoy or lifejacket but he will spot check them; if he finds deficiencies, he will intensify his inspection in that particular area. However, a classification surveyor would be expected to check every lifesaving appliance during his survey, prior to issuing a Safety Equipment Certificate.

Current Practices In line with the appropriate national and International regulations, we rely on the following: the IACS classification societies with which we have agreements for classification and statutory certification of vessels (including, where an individual classification surveyor deems necessary, unscheduled inspections); and, an ever-increasing network of non-exclusive Vanuatu Marine Safety Inspectors for unscheduled inspections.

The comprehensive agreements with the classification societies provide not only for the issuance of statutory certificates, but also,

- require the surveyor to verify proper crewing in accordance with the vessel's Minimum Safe Manning Certificate during the course of any survey;
- authorize the surveyor to take action where the condition of the ship or its equipment does not correspond with a Convention certificate, or its manning is deficient in important respects, or the ship is not fit to proceed to sea without danger to the ship or crew;
- authorize the surveyor, when such conditions exist, to go aboard at any time to conduct a general inspection. Free access to the vessel, without waiting for the owners invitation is vital to the success of this authorization.

In addition to the agreements with the classification societies, we now have hundreds of individuals and organizations worldwide, that we can call on for routine annual or special safety inspections. In 1991 we began to expand our network of inspectors. Now, we regularly inspect almost all of our high priority ships annually. We emphasize and prioritize larger and older vessels, including bulk carriers. Our ultimate goal is for 100% of the convention sized fleet to be inspected annually by Vanuatu Marine Safety Inspectors.

There are other inspections which are more commercial in nature: P & I inspections, charterers inspections, load or discharge port inspections, change of ownership inspections, pre-registration general condition surveys, etc. These are all done to minimize financial risk, without the emphasis being placed solely on total quality or safety of the crew, ship or environment. Even PSC inspections, to a large extent, are used to protect the local environment, rather than promote the general safety of the vessel. However, since they are becoming extremely comprehensive, they cannot fail but to promote the global aspect of safety.

Inspection Forms The inspection forms used by the Vanuatu Marine Safety Inspectors have been, and are continually being, revised to reflect requirements mandated by IMO or Vanuatu Maritime Act and Regulations, while avoiding unnecessary or duplicate information found elsewhere.

The forms are arranged to permit the inspector to proceed logically from the vessel's office, to the navigating bridge, to a topside inspection of lifesaving, firefighting, and other safety equipment, and general housekeeping, before returning to the office for consultation with the master to review the inspection details.

When the reports are received at Vanuatu Maritime Services, they are reviewed in light of Vanuatu Maritime Act and Regulations, International Conventions and the standard practice of good seamen. Comments are then prepared for the owners or operators. These comments may include: mandatory requirements, recommendations, suggestions and enquiries.

We will mandate that changes be made to equipment or practices to bring the vessels into compliance with IMO or Vanuatu Regulations-for example, lifeboat drills must be conducted weekly.

We will recommend that changes be made in equipment or practices, in line with general safe practices of seamen-for example, certain log entries should be routinely made.

We may suggest that changes be made, where it is apparent that there is currently no established shipboard practice

or guideline-for example, participation in a weather routing service, bridge resource management training, etc.

We may ask questions which would clarify how a vessel is equipped or managed: for example, we may question the installation of a Satellite EPIRB, which could be incorrectly coded, to enable the coding to be corrected and the EPIRB added to the Search and Rescue Point of Contact (SPOC) emergency list.

The safety inspection forms are organized in 6 pages:
ship and inspection particulars and documentation;
ship's publications, navigational charts, and records;
navigational equipment and log entries;
licensing and certification;
firefighting and lifesaving equipment; and,
pollution prevention, housekeeping, general safety and commentary

Copies of the forms are available upon request so that you may prepare for Safety Inspections. However, the Inspector is never limited to restricting his inspection or subsequent remarks to these forms; and, he may, if the conditions warrant, concentrate his whole inspection on only one aspect of the vessel's safety readiness, if that is found to be deficient.

Copies of the forms are included in this Bulletin. Annex 1 provides notations which may assist you better understand what the Marine Safety Inspectors will be looking for.

In Summary Vanuatu Marine Safety Inspections are only one means available to assist owners and operators ensure their vessels are maintained in compliance with International Conventions and Vanuatu Maritime Act and Regulations. They complement the Mandatory Annual Surveys and Port State Control inspections.

Vanuatu Marine Safety Inspections should not be considered punitive in nature, although we may be mandated to impose fines on a vessel if it does not comply with certain sections of the Maritime Act or Regulations. For example, if the officers are not properly licensed, or if lifeboat drills are not conducted weekly, fines will be imposed.

The inspections, the forms, and our critique, are designed to benefit the safety of the ship, the crew, and the marine environment. If appropriate actions are taken to correct the deficiencies found during these inspections, then we can almost guarantee that Port State Control inspections will find fewer reasons for detentions. And we all know that detentions or delays are costly, and could mean the difference between a lucrative charter and expensive idle time.

ANNEX I PART A.GENERAL Section 3. Required by Vanuatu as per IMO Resolution PART B.
DOCUMENTS Section 13. Certificates must be current. Last annual survey dates must be filled in as appropriate. If not current, VIVISL - New York must be notified immediately.

PART C. PUBLICATIONS Section 14. a, b, c, f, g, i Required by all vessels Section 14. h Required by Vanuatu Maritime Regulations, Chapter 8 Section 14. 1, m, n, o, p. q. t, u Required by some vessels, as appropriate

PART D. CHARTS, PUBLICATIONS & RECORDS Section 15. a thru l SOLAS, Chapter V, Regulation 20 Section 15. m, n Required by Vanuatu Maritime Regulations, Chapter 8 Section 15. r SOLAS, Chapter V, Regulation 21 Section 15. x SOLAS, Chapter V, Regulation 8 Section 15. IMO Resolution

PART E. NAVIGATIONAL AIDS Section 16. a, b SOLAS, Chapter V Section 16. RDF Bearings - SOLAS Chapter V, Regulation 12 (to be checked annually) Section 16. Magnetic Compass adjustment - SOLAS Chapter V, Regulation 12 Section 16. t, u v, w, z, aa GMDSS Requirements Section 16. x, y Required by all ocean going vessels

PART F. BRIDGE LOG BOOK ENTRIES Section 17. a, i, p SOLAS, Chapter V, Regulation 19 Section 17. b, c, n, o Vanuatu Maritime Regulations Section 17. d, e, f, g, h, k, m Practice of good seaman

PART G. LICENSING All officers must hold valid Vanuatu licenses in accordance with Vanuatu Maritime Act.

PART H. FIRE FIGHTING EQUIPMENT Section 21. b, c Minimum of 2 per vessel (except passenger vessels) Section 21. d, e Service is required bi-annually; recommended annually Section 21. f Required weekly by SOLAS Section 21. k, m Mandated by SOLAS

PART 1. LIFESAVING APPLIANCES AND EQUIPMENT Section 22. a Lifebuoys with lights - 50% Minimum (SOLAS, Chapter III, Regulation 7) Lifebuoys with Lines - 2 minimum (SOLAS, Chapter III, Regulation 7) Lifebuoys with smoke floats - 2 minimum (SOLAS, Chapter III, Regulation 7) Section 22. b Lifejackets reflective tape and lights - Required by SOLAS Section 22. c Fire and boat drills - Required weekly by Vanuatu Maritime Regulations Boats released - Required quarterly by SOLAS Section 22. d Service required annually by SOLAS

Section 22. e, f, g Required by SOLAS, Chapter III Section 22. h Required quarterly by Vanuatu Section 22. i
Rocket parachute flares - 12 required by SOLAS, Chapter III

PART J. BILGE AND BALLAST TREATMENT/POLLUTION PREVENTION Section 23 & 24 MARPOL 73/78
Requirements

PART K. GENERAL SAFETY Section 25. a SOLAS, Chapter V Section 25. b, c, d Condition - only "good" is
acceptable Section 25. f, g SOLAS, Chapter III requirement
Download Form SI 103-5/05, "Report of Safety Inspection" (Adobe PDF format, 175kb)