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January, 2013



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"I am a die-hard Optimist"

Directorate - General Shipping
Shri Gautam Chatterjee

TSUNAMI OF DOCUMENTS - A FUKUSHIMA in the making



The ISM Code implemented in 1998 was meant to make the oceans cleaner and ships safer. However fourteen years after the implementation of this Safety Management code (ISM Code) it is unfortunate that Oceans are now at a greater risk from getting polluted and ships more prone to accidents and disasters, sadly due to a lack in understanding the 'spirit' of the ISM code.

The existing practice in the industry of equating the safety standard of a Company with the size and volume of its documents is a trend which is generating more paper and dangerously eroding the actual safety on board ships.

Whilst much has been said over the years about the ISM Code, good and bad, but this time the code should not be blamed for this looming disaster. The architects of the ISM Code must have never dreamt in 1993 whilst framing the code, of how brazenly the industry

could churn documents at the drop of a hat, sink the ship's Master and Crew with a Tsunami of documents and thus inadvertently place the actual safety of the vessel on the back burner.

The extent of this unwanted element would vary with shipping companies; Perhaps less with those who prefer more user friendly procedures/ documents, though however the danger of excessive documentation is still pronounced across the shipping industry.

About the author

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A Marine professional with 17 years of sailing experience and 5 years in command. Since 1995 gave up sailing and established as an independent

Marine and Management Consultant. Since then have completed over 115 consultancy projects related to Quality, Environment and OH&S.

Empanelled with International Maritime Org (IMO) since 2000 as a specialist consultant and with RCA, UK as an Auditor since 1997. Author of one of the first books on the ISM Code published on 1st July 1998 the day the ISM Code came into effect. Now a Marine & Management Consultant based in Singapore with specialization in driving Operational excellence in HSE&Q using Lean Sigma and Common sense approach.

Capt. Thomas Waldher of RIGEL Schiffahrts GmbH & Co German Ship Owners and operators of ships reflects the psychological impact of this excessive documentation and says: 'ISM did contribute to safer management of ships and better protection of the environment. It is a huge challenge for ship operators

Living Documents!



to keep the documentation simple. In most cases the aim is to legally protect different interest which does not contribute to a safer operation of the ship. Seafarers who live and work on board for extended period of time cannot be expected to think of theoretical procedures and guidelines at every minute during their stay on board. From a psychological standpoint this is not feasible and hence the aim should be to consider how to provide a safe and environmental friendly working condition for the seafarer rather than demanding to read lengthy and difficult to understand procedures which are aimed at covering the shortcomings of the organization's own systems'

It would be least surprising if Managers

ashore are unable to retrieve documents from within their own documented systems due to the sheer size. If this is the condition of the office, what could we expect from a Master/Ship's crew located remotely on a ship with little or no shore guidance or assistance? This reflects the pathetic condition of documentation and the magnitude of the problem in the industry.

Would it then be correct to say that every vessel afloat has a decent percentage of a 'Fukushima element' in it? Waiting to happen...

The results of a recent survey of personnel comprising of shipping experts Owners/Managers, Classification Society, Flag/Govt. Surveyors as well as Senior officers working on Ship's are not surprising

either. It is clear that documentation and information being dumped on ships, is a matter of concern. For obvious reasons their identity is not disclosed.

- 93% believe that the documents on the ship are excessive
- 87% say that there is a good amount of duplication of documents
- 95% agree that documentation is not simple to read and understand
- 85% believe that Surveyors & Inspectors insist on documentation
- 79% believe that Company generates documentation
- 100% believe that documentation is required
- 100% agree that documentation should be simple, effective and brief

There are many in the industry who benefit in the process of creating and approving a complex SMS without taking into account the ability and limitations of the Seafarer who is the final user. The key purpose of ensuring that the Ship's Crew reads and understands what is contained within the Manuals is hardly achieved due to various reasons:

- The data is too monotonous and 'general' so the crew and officers find it boring.
- A simple process or activity has been expressed in an elaborate and complicated manner which even Albert Einstein would find it difficult to understand and digest.

Mr. Björn Hojgaard CEO of UNIVAN Ship Management puts it very aptly, 'In an effort to cover all bases the

Safety Management Systems in use on board today's merchant ships has become bulky. While good policies, procedures and forms can be of great help to shipboard management, however the sheer volume of documents and paperwork is a deterrent to many seagoing officers'

Shore establishments/ Companies need to be more prudent whilst passing Manuals/data and important information to ships. It should be to the point, simple to read & understand, as brief as possible and less fragmented as well, so that it motivates a seafarer to read.

However this dumping has quite naturally resulted in:

- a. Making the Crew insensitive to seemingly sensitive information, thus making the ships more unsafe and prone to accidents and pollution.
- b. It keeps the Master & Crew more occupied with un-wanted

documents, paper work and less time on vessel's safety and operations.

Besides there is another important aspect which relates to the education and IQ level of a seafarer. Unlike a Scientist, a seafarer (like most others) has average cognitive functions which limits the ability to read and absorb information. This makes it more important that the seafarer is given just the required documents, in the right size for his mind to be able to read and understand. It would be unfair to expect a seafarer to cover a Singapore-London flight in 4 hours when everyone sitting ashore (office staff) requires close to 14 hours for the same.

Dr. Margaret Heffernan an expert on information and the author of 'Wilful Blindness' writes that 'We are receiving more information on a continuous basis, but greatly misunderstand the brain's capacity to handle this. Imbibing too much

information also impairs the brain's decision-making powers'. Lagging indicator of such an impairment is subtly visible as 'human error' in marine accidents.

In simple meaning, if we ask a Chef to read a thick book instead of a one page recipe, he in all probabilities will ignore the recipe, dump the book and cook the dish his own way. A ship-owner/Operator would certainly not like the crew to by-pass procedures, but they would naturally do it, since procedures were never crafted in a 'user friendly' manner. Such an act by the crew would jeopardize the very ethos of the industry and IMO's philosophy 'Safer ships and Cleaner oceans'.

Most in the industry who are in touch with 'pulse on the ship' would agree, that more often Manuals are only decorating the shelves on-board the ship and pulled out only for the perusal of an Inspector.

Mr. Cong Jian a Senior Executive of a Chinese Ship Owner Dalian Ocean Shipping Company Comments that ISM Code had no doubt worked effectively over the years and resulted in safer shipping, however numerous procedures and check lists are steadily on the increase. Paper work and documentation on the ships is far more complicated. Such a proliferation of documentations results in undue pressures on people, in particular to shipboard personnel and does not engender a safety culture. On the contrary it creates what all stakeholders agreed not to do 'increase in crew fatigue'. In addition, it serves to create a negative approach towards documents and paper. It is



essential for IMO to recognize the current state of affairs and work together to encourage all the parties concerned to revisit ISM's goals and foundations.

In 2010 there was a new regulation MEPC.186(59) for the tankers, namely 'STS Operation plan'. The IMO's resolution stated that 'The STS operations Plan' may be incorporated into a Company's existing Safety Management System.....'. but none of the Recognized organizations operating on behalf of the Administration ever thought of suggesting this or guiding the industry accordingly. This is another example of a Manual/Document which has not been able to add value. Not surprising since they are approved not by any STS specialist but Surveyors/Engineers who perhaps have never witnessed an STS operation, let alone understanding the technicalities of such a complex operation. Hence it is difficult to expect any value add. Further if we pick any Tanker operator we would discover that barring a couple of sheets of ship specific information the remaining pages of the STS Manual are the same and hence in retrospect Owners and RO's could have worked out a better user friendly solution, instead of creating a Manual which has not added value. One of the Recognized organizations has gone to the extent of sealing the documents in the STS Manual with a plastic seal to prevent the Shipping company/Operator to make any so called 'un-authorized changes'.

N. Rengarajan, CEO, Transocean Shipping Ventures Private Limited, Mumbai says he is striving to improve their Company's documentation and comments: 'Successful implementation of any standard requires a thoughtful



and a holistic implementation. Documentation should be an aide to the seafarer and not a burden. Hence there is a big need to rethink our ideas to have good, simple but adequate documentation procedure for our industry which assist the crew and encourages them to read the manuals'

SOPEP (Shipboard Oil Pollution Emergency Plan) was established in 1990 as a document which was meant to be a guide for the ship's Master, Crew/Officers so that they are able to act in case of any pollution. Over the years it has become another bulky Documentation, which is hardly read by ship's staff. In the eventuality of a spillage or pollution, in all probabilities the SOPEP would perhaps be the last Manual a Master would refer to, since it has been structured to comply with a regulation and not really as a procedure to guide the ship's staff. The cherry on the cake is the VRP (Vessel Response Plan) which is a US Coast guard requirement- A response plan in case of Oil pollution. If US who a member of IMO believes that excess

documentation is an issue then it is necessary for them to see how they could integrate their additional requirements in the already existing (IMO's) SOPEP Manual of a vessel, thus reducing the extra documentation and adopt similarly for their other specific USCG requirements.

We now have the SEEMP effective Jan 2013, the MLC-2006 on the threshold coming up on 20th August 2013. With the present trend these requirements too are bound to result into increasing the un-wanted documentation to ridiculous levels, which can all be avoided through diligent integration of the requirements within the existing framework of documentation.

Interestingly GLAcademy, the academic arm of Germanischer Lloyd has made a good attempt in the right direction by launching a 'Lean documentation' training program.

Mr. Ulrike Schodrok the Global Coordinator for Germanischer Lloyd Academy comments, 'With the launch of our seminar "How Lean is your

SMS?" we have taken a pro-active initiative and opened the debate on the need to identify inefficiencies, avoid unnecessary documentation and generally take a 'leaner' approach to ISM implementation. With more regulations to come and new management systems to be integrated it is time to investigate some efficient options to make the SMS more effective. A leaner SMS would also achieve endorsement from the crew, enhance their commitment, improve awareness and contribute to a better safety culture.

Some Charterers have now started insisting Owners/Operators to include within their Manuals and procedures extracts from 'Reference' books such as COSWP, ISGOTT, SIGTTO, Chemical tanker guides etc. This is absurd and most un-wanted. This would besides increasing the pages in a Manual, would also dilute the 'status' of a reference book, resulting in serious secondary hazards, more pronounced than not having any documents at all. This is the last straw on the camel's back!

With this trend, soon we would see a seafarer joining a ship with a suitcase full of publications and manuals and after completing his tenure and upon leaving the ship he would perhaps be fit to go straight to 'Harvard University' and seek admission for research....

Ms. Evelyn Soon of CAYMAN Flag comments, clearly, it is advantageous for the SMS documentation to be as concise as possible to ensure effective compliance. If the system is overly complex and burdensome, this is likely to give rise to issues when this is put into practice. Documentation

should be developed to record what is actually done rather, than making the process fit the procedure. The guidance we offer is to ensure that compliance with the statutory elements can be carried out without burdening the seafarer. All too often during external audits, we find that procedures require unnecessary and over complex steps to be followed. This can lead to non-conformities as the seafarers will inevitably leave out the unnecessary steps or may find it difficult to comply with. Clearly, we would never discourage going above and beyond the requirements set out in the Regulations, but this should not be at the sacrifice of other procedures that must be followed.

The Industry must take cue from the initial failure and current success story of the ISO 9001 standard, from which the ISM Code was derived. When introduced in 1987 & amended in 1994 the ISO 9001 was criticized by the world as a 'document tiger'. However ISO Geneva was quick to respond and act, by amending the ISO 9001 standard in the year 2000 and leaving the user to decide the size and need for documents. This resulted in a most 'user friendly' and globally accepted quality management standard.

It is earnestly requested that IMO takes heed of the predicament in the shipping industry and the rising documentation and consider amending the ISM code. An amendment which would make it necessary for every Ship owner/operator to ensure that only the required Documents and Manuals are sent to the ships and even that is presented in a easy to understand and user friendly manner for the seafarer.

Whilst ISM Code has undergone three revisions but we have still to see a code which would be user friendly and would motivate a ship owner to adopt and implement.

I also believe that the stalwarts at IMO need to review the ISM Code itself which I deeply regret to state is out-dated and obsolete. The code introduces Risk Assessment in 2010 when it was introduced in the shore based industries in 1999 (with OHSAS 18001). It has still to introduce the concept of 'Preventing the occurrence' of a Non-conformance, the Pro-active action, which was introduced in the ISO 9001 in the year 2000.

If IMO has to move with times then it would need to structure a mechanism whereby a Marine / Technical personnel serving in IMO involved in defining policies and guidelines for the industry are required to sail on ships at regular intervals to keep their understanding of the industry current.

It is a pity that the Industry never made a sincere attempt to understand the tenet of the ISM Code, for which an effort was required, but on the contrary adopted the more convenient method, namely, the exaggerated and personified interpretation of the ISM code, which was against the principles of the code and its architects. The maritime industry is now heading to a point of no-return and if left uncured this may be the next terrible question (after environment) which would need to be answered to the community. It is a serious issue to take stock of, before we reach a point when Documentation loses its sanctity and the industry loses confidence in the ISM Code.