

SUBMISSION TO THE INTERNATIONAL COMMISSION ON SHIPPING

Training

It is getting increasingly difficult to justify training of seafaring recruits on economic grounds, especially with the emphasis on bottom-lines and cost-cutting. Furthermore, those who do not train can quite easily poach from others. It is therefore imperative for other stakeholders, namely governments and unions, to support such training.

Promoting quality

There should be more “carrot” and less “stick” to encourage a quality/safety culture. Right now, all the regulations and inspections are raising costs and making things much more difficult for quality operators while the substandard ones continue to slip through. To achieve early acceptance or implementation of better standards (e.g. TBT-free paints), a small incentive such as a reduction in port dues will go a long way.

Effective port state control

The tendency among regional MOUs on port state control to increase the inspection rate or percentage is missing the mark. Rather than trying to inspect more ships, port state control should be looking at better targeting to get the substandard ships. One simple point is worth emphasizing – that every inspection of a good ship is a waste of time and effort, both on the part of the inspector and the ship’s crew!

Effective rule-making

Rules should be developed by experts. The current system in IMO, where rules are discussed and decided by national delegations many of which do not have the necessary qualifications and experience, is flawed. In this respect, the IMO should take a leaf from ICAO.

Proper investigations

There is need for an independent and international system of investigation of serious casualties. This cannot be left entirely in the hands of flag states and coastal states, many of whom neither have the resources nor motivation to do a proper job. And even where they do, political considerations may cause the investigations to be less than objective. Without proper investigations, we will never learn.

Litigation vs. transparency

These do not go hand in hand. The trend towards more litigation and criminalisation of ships’ crew runs counter to the greater transparency which is required by ISM and being promoted for the industry. Whatever records which are kept for the purposes of ISM, especially of improvements and corrective actions, should not be used against the shipowner/operator or ship’s crew.

Shipbuilding standards

We need proper international shipbuilding standards to ensure that ships are built in the right way. This also applies to machinery and equipment manufacturers. Otherwise, the operation of those ships is going to be fraught with unnecessary risks. We should no longer tolerate incidents of failure during delivery voyages. At the moment, anyone can set up a shipbuilding yard anywhere and without any control over its standards. This is unacceptable.

Rationalise rules and enforcement

Almost everyone accepts that there is a proliferation of rules and inspections. Besides raising costs, it is becoming a nuisance and counterproductive. While quality operators suffer along, the bad ships still slip through. To begin, the rules should be rationalised. The various interested parties, like OCIMF and individual oil companies and insurers, should propose incorporation of their requirements into the relevant international conventions and class requirements. There should then be no need for additional inspections apart from those of the flag state, classification society and port state. These entities and their individual surveyors/inspectors should be held accountable for their actions or omissions.

Taking stock

We should take stock of the current situation with ships' crews and their managers; obtain feedback on how they are coping with existing rules and enforcement measures; and see what improvements can be made to achieve safer and better quality operations. It would be extremely unwise to continually add to the burden by introducing more rules, manuals, surveys and certificates, and check lists, if the current situation were already unbearable.

Fuel oil standards

The quality of heavy fuel oil supplied and consumed on board ships has deteriorated over the years, as it is basically the waste product of the refining process. Many of the problems that we face today with the propulsion machinery and associated equipment can be attributed to the poor quality fuel, even though manufacturers may claim that their products can cope. These problems do not only increase the workload and stress on ships' crews, they also expose the ships to the risks of serious accidents. The industry must move towards proper fuel oil standards, and not continue to accept whatever waste product being dished out.

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