

SUBMISSION TO ICONS FROM THE HELLENIC REGISTER OF SHIPPING, GREECE.

57745/D/CAH/RCT
Piraeus August 1st 2000

International Commission of Shipping

PO BOX 162
Civic Square
Caderra ACT
AUSTRALIA 2614

Dear Sirs,

In response to your letter, dated 26th June 2000 the following submission is kindly made to your Commission.

The Hellenic Register of Shipping was established in 1919 and managed to operate since then continuously and successfully, although its great growth and modernization started in early eighties.

Amongst its main achievements towards improving the quality of the services it offers we could mention the following :

- As from 1st May 1994 HRS has put into force its own Rules and Regulations, in which the IACS Unified Requirements were incorporated (after getting permission).
- HRS Since 1995 has been certified against the ISO 9001 standard.
- Also it has been recognized by the European Union Commission to meet the qualitative criteria of the council Directive 94/57/EC.
«On common rules and standards for ship inspection and survey organizations and for the relevant activities of Maritime Administration.»
- It has been intensively involved in Safety management certification, in compliance with the ISM Code.
- In order to obtain in-house know-how, which helps in keeping its Rules and Regulations up to date, HRS presently participates in 14 very important research projects.
- As soon as the Greek National Accreditation Body was activated (3rd January 2000) HRS submitted its applications to be accredited in compliance with the EN 45004, EN 45011 and EN 45012 Standards.

Concerning the task of your Commission we strongly believe that the elimination of substandard shipping is, and it ought to be such, a clear goal beyond any negotiation and painless abstract discussions. Any compromise and recession to this battle may result to catastrophic impacts on the safety at sea and the protection of the sea environment.

Although in this effort the Class Role remains predominant, it is a common place that due to the global character of the maritime industry, not only in the geographical sense but also due to the involvement of many parties of different nature (Flag Administrations, Classification Societies,

Ship Owners/Operators, Insurers, Charterers etc) the cooperation and the mutual assistance are a prerequisite for the achievement of the final goal.

To this connection HRS approves any initiative taken by the responsible Authorities towards this direction and readily signs relevant agreements. In consistency to its principles, HRS was among the signatories of the **Maritime Industry Charter on Quality** launched by the European Commission and remains fully committed and supportive to its implementations.

Attached is the relevant letter to the European Commission (G VII)

Moreover to our view:

- Much more effort should be given to the application, of the existing requirements than in the adoption on new additional measures which can lead to unmanageable situations.
- The increasing trend for application of regional legislation should be strongly opposed. Instead the IMO should be the single forum for the adoption of any such measures.
- Although self-policing remains necessary, all the recognized by the IMO Classification Societies should be obliged to keep and implement equal quality standards and should be closely monitored by it. Not recognized Classification Societies should be obliged to quit operating.
- Certain rules for better transparency as well as investigative procedures should be set by IMO.
- Taking into consideration the importance of the effective ISM implementation on board the ships, we believe that their audit every two and a half year is ineffective. The often change of crew imposes more often audits (preferably yearly) otherwise Class Societies could be unreasonably blamed.
- The Surveyors are the key for all class activities. For that reason their training, their evaluation and their competence should enjoy the highest priority by Class Societies.

We thank you very much for the opportunity your commission offered to HRS to submit its views.

We wish to your Commission every success to its very important job, remaining always at your disposal.

Yours faithfully,

D. Melissinos
Gen. Techn. Director

50335/E/CAH/RCT
Piraeus, 20th May 1998

Mr. Robert Coleman
Director General of Directorate-
General VII Transport
European Commission (Office BU 33 1/45)
Rue de la Loi 200
B-1049 Bruxelles
BELGIUM

Dear Sirs,

Following the kind invitation of Mr. Neil King we confirm with pleasure the participation of our Organization to the Conference on Quality Shipping, through our Quality Assurance Director, Mr. **Constantinos Chiou**.

Meanwhile, since HRS was not included in the Conference program, we state that HRS in promoting the goals of the Quality Shipping Campaign, is committed as following:

- a. To consult periodically with the other recognized by the European Commission Organizations with a view to maintaining and implementing equivalent technical standards.
- b. To cooperate very closely and effectively with Flag Administrations and Port Authorities.
- c. To decline entry to HRS' Class in case shipowners are reluctant to rectify the recommendations of the previous Class and exchange information with the other Societies in case of transfer of Class, preventing thus the "Class Hopping".
- d. To carry-out the Class Entry Surveys as well as the Special Surveys mostly through exclusive surveyors of its Head Office.
- e. To strive for effective and uniform implementation of the ISM Code.

Yours faithfully,

D. Melissinos
General Technical Director