

Vetting Covid-19– reactions from OM stakeholders

Safety of our staff remains most important at all times, especially while our managed vessels calling terminals for loading /discharge operations. We took the initiative of discussing with various Oil Majors since their group meeting at Dubai early this year, whilst effectively liaising with INTERTANKO. After concerted efforts from members, OCIMF and Oil Majors have advised their temporary direction of vetting process going forward.

We are following up as closely as possible through local agents, SIRE inspecting companies, Oil Majors, Owners and charterers as per below.

1. We are inviting Oil Majors as usual and take action as per feedback from the relevant oil major.
2. Check early with terminal through local agents regarding permission for the sire inspector's boarding.
3. Should inspection is not permitted by the terminal we retain the info should any Oil Major would require the same going forward.
4. At all times maintain effective and prompt communication with Owners/Charterers.

30th March

Oil Companies International Marine Forum – OCIMF

While we all work through this unprecedented situation it is important to maintain delivery of essential goods and services on a global basis. OCIMF members, SIRE/OVID report users, vessel operators and inspectors are finding it very difficult to continue normal inspection regimes due to restrictions in travel, access through terminals, social distancing and health and safety considerations to varying degrees depending on location. The situation is fluid and will continue to change country by country for some time.

OCIMF Members

OCIMF Members will be acutely aware of many restrictions in place which impact their ability to conduct SIRE and OVID inspections. These restrictions vary on a country by country basis and are continuing to evolve almost on a daily basis. The decision to undertake an inspection, or not, is for the Member company. OCIMF would however encourage all decisions in relation to conducting an inspection to have safety and health considerations of all those involved at their forefront.

The OCIMF vision is “No harm to people and no harm to the environment”. With this vision in mind a pragmatic approach may include consideration of the following:

- *Can an inspection be deferred to a later date – is it essential at this time?*
- *The health and safety of all those involved in the inspection, and those they interface with to conduct the inspection.*
- *What steps need to be taken to adequately protect the people involved, including social distancing and PPE, if the inspection goes ahead?*

SIRE/ OVID Report Users

OCIMF expect a much-reduced number of new inspection reports will be submitted to the SIRE and OVID databases because of the challenges of undertaking the inspections during the current COVID-19 pandemic.

Recipients of reports from both databases are encouraged to consider this new reality and take a pragmatic approach when reviewing reports against the current COVID-19 background. The decision however is for the report user to make,

A pragmatic approach may include consideration of the following:

- Age of the Report - can an older report than normally required be accepted?
- What are the additional risks if an older report is used?
- Can these risks be mitigated through other means – e.g. additional data from the operator or from other sources?

Extension of SIRE/OVID Report Availability due to Covid-19

As mentioned in the bulletin released last week, OCIMF is extending the availability of 'live' reports in the SIRE and OVID programmes to 18 months. In order to do this, some changes in the system are needed. The intention is to 'go live' with extended reports on 1st April. We hope this action will assist both marine assurance organisations and operators during this period of uncertainty.

25th March

INTERTANKO

Intertanko Position: The regulations are that you can only reject a vetting inspector if there is a clear and present danger for the crew on board. i.e. if the inspector is clearly ill, coughing and sneezing etc. If there are no obvious and clear signs, then the inspector should come on board but following all safety precautions ordered by the master on board.

V.Ships

V Ships position: when SIRE/CDI are approaching the due date, it is important that the request for attendance is still made by the fleet cells, regardless if we are aware that the Oil Major is unlikely to attend. This to ensure we made every attempt to facilitate the attendance with a view to acceptance continuity. Then it is up to the Oil Major to extend the current acceptance.

Dow Vetting Policy Adjustments

As the situation has gotten more severe, it has become increasingly complex to arrange vetting inspections. In response, the Chemical Distribution Institute (CDI) has made temporary changes to their program. In conjunction, Dow will temporarily modify its vetting policies to follow these changes at CDI. In doing so, we feel these temporary adjustments maintain a focus on safety and help assure critical materials continue to be delivered to the places they are desperately needed.

Below are the latest changes made at CDI. The situation is dynamic, and further changes may be necessary. While it is not possible to say with full certainty that Dow will adopt all future changes to the CDI program, it is our intention to do so (including an eventual full return to pre-COVID practices).

For CDI-Marine

1. CDI will continue to arrange inspections as requested in the usual manner, and where possible with inspectors who don't have travel restrictions.
2. However, to facilitate this on a temporary basis, CDI may have to use inspectors based locally based inspectors in the country or in an adjacent country of the inspection request.
3. None the less, in the scenario where, following a request for a ship inspection and where CDI is unable to nominate an inspector to a particular port/country, due to COVID-19 related matters, CDI will,

temporarily, on a case by case basis, extend the existing **active report** for the ship for a period of 2 months from the anniversary date of the initial inspection. (However, all archived reports will continue to remain archived)

For CDI-T and IMPCAS

1. Any report which is currently in active status and is due to automatically archive before the 1st June 2020, then CDI has extended this date to enable that report to remain active in the database, until the 1st June 2020. (However, all archived reports will continue to remain archived)

In the case of European barge inspections via the European Barge Inspection Scheme (EBIS), if a barge owner is unable to organize a timely inspection during this challenging time and has documented evidence that they tried to obtain an inspection within a reasonable time frame, Dow will take a pragmatic approach to the inspection validity. In these cases, please contact Dow as soon as possible as each instance will need to be considered case by case.

24th March

Shell Time Charter

During this Covid-19 crisis, Shell are very concerned about employees and contractors globally and this includes Time Chartered ships crews, and fully support all reasonable precautions the ships and Owners are taking to protect the Crew.

Shell expect Owners to be liaising with the various organizations such as P&I Clubs/Class and Governments involved in Ship registration and the World Health Organisation on how to avoid and limit the possible transmission of Covid-19 to or from the ship.

Shell also expect Owners to be staying abreast of evolving port regulations and restrictions. As Charterers, Shell will support these efforts and pass on any information we receive from the cargo side in relation to such regulations and restrictions.

P66

Further correspondence with our time-chartered vessel operators on the COVID-19 crisis.

These are indeed unprecedented times and we share and empathize with vessel crews on any hardships they may be facing, be it extended time onboard due to lack of relief, extensive port screenings, etc.

Due to the ongoing impact of Covid-19, inspector travel, access through terminals and access to vessels to conduct inspections is becoming difficult. In many instances, depending on where vessels are trading, inspections are not possible to arrange. As consequence, this will have an impact on the ability of vessel operators to maintain SIRE inspections within normally acceptable date windows. Recently, OCIMF has taken a proactive decision to provide marine assurance organizations' flexibility by extending the availability of 'live' reports in the SIRE and OVID programs from 12 months to 18 months before being archived.

Phillips 66 Marine Assurance has internal controls in place that include vetting flexibility in regard to expiry of SIRE and CDI inspections as well as crew experience matrices. All vessel screenings and any related exceptions resulting from the COVID-19 crisis will be reviewed on a case by case basis, keeping in mind that the P66 Assurance program has the flexibility to allow operators to maintain their vetting status if their SIRE expires and are unable to conduct a new SIRE due to the COVID 19 global pandemic.

20th March

Repsol*

Apart from a very few exceptions which will be determined case by case. Repsol will not inspect any vessel. Vessels without a “fresh” SIRE or REPSOL required Inspection will be evaluated case by case based on all available information. These actions will remain in force from now until Sanitary alert by Covid-19 will cease.

18th March

BP*

Vetting: We will evaluate vessels whose 6 monthly SIRE inspections are affected on a case by case basis. We will consider all the available information that is at hand, including continued compliance with relevant regulatory requirements of the vessel.

SIRE inspections: We will consider BP SIRE inspection requests in affected regions / countries on a case by case basis and will endeavour to continue inspections using in-country inspectors. In the event that an in-country inspector is not available in these affected regions / countries, then such inspection request will be rejected so you are advised to plan for alternative arrangements.

IMT*

IMT is taking a pragmatic approach and applying flexibility considering the vessel’s trading pattern and ports called when reviewing the vessels last SIRE inspection report as part of vessels screening process. In some cases, we may need additional information from the operators to evaluate the vessels.

1. IMT understands the situation and will evaluate the vessels on case by case basis with all available information.
2. Clearance will take all the inputs/challenges into account and use the last sire/psc, while screening (as usual).
3. Operators are encouraged to write to MS Owner interface especially challenges towards extending drydocks etc as same could be used as additional information while screening (may prevent undue turn down due to lack of information).
4. Should the situation continue, then IMT is also considering video conferencing in lieu of Operator visits.

Chevron*

We are well aware of the situation and will review overdue SIRE situations on a case by case basis.

Total*

For the moment, our vetting policy is as follows:

- For vessel less than 15 years old, we require a SIRE report done during discharging operations of less than 12 months.
- For vessel of 15 years old and above, we require a SIRE report done during discharging operations of less than 6 months.

However, considering the exceptional situation, in order to ensure business continuity, if needed, we will have a more pragmatic approach.

Ineos*

Should a vessel without a valid SIRE be nominated Ineos will take it on a case-by-case basis and screen providing there is evidence of attempts to get a SIRE inspection. Ineos will then consider a desk top audit looking for additional information such as most recent PSC.

Lukoil*

In the light of existing circumstances every tanker's assessment is handled on case-by-case basis. The decision on every vessel's vetting status is based on the analysis of a number of factors, relating to the vessel's condition.

ENI*

In exceptional circumstances, same level of actions is needed. Therefore, I may tend to say that if Class can post-pone certificate for 3 months, there should be no problem for us. If you intend and extra 3 months in excess of the conventional window of -3/+3, we'll evaluate according to circumstances (i.e. Vessel / Operator's records, etc.). All, anyway, based on a certification issued by the Classification Society.

17th March

Oil Companies International Marine Forum - OCIMF

OCIMF encourages its submitting members to take a pragmatic approach when considering the commissioning of inspections in affected areas in the current situation. It should be noted that SIRE/OVID inspections are commissioned by submitting members and not the OCIMF Secretariat. The acceptance, or otherwise, of a SIRE/OVID report for reasons of age is a matter for individual recipients and not the OCIMF Secretariat.

In response to recent industry engagement, a number of submitting members and recipient members have indicated that they will apply sound judgement, pragmatism and flexibility when considering the commissioning of inspections and evaluating inspection reports for vessel eligibility.

OCIMF encourages vessel operators to engage early and engage directly with submitting members with regards to any challenges that may be experienced in conducting SIRE inspections.

Inspectors are encouraged to engage with the member commissioning the inspection and to monitor and follow the health and travel advice provided by the WHO and by relevant national health authorities when making their decision on travel for SIRE/OVID inspections. This includes the use of prevention and control measures such as personal hygiene and use of personal protective equipment.

Chemical Distribution Institute – CDI

1. Ship Operators should continue to submit inspection requests to CDI in the usual manner.
2. However, to facilitate this on a temporary basis CDI will now have to nominate available inspectors based locally in the country or in an adjacent country of the inspection request.
3. None the less, in the scenario where, following a request for a ship inspection and where CDI is unable to nominate an inspector to a particular port/country, due to COVID-19 related matters. CDI will, temporarily, on a case by case basis, extend the active report for the ship for a period of 2 months from the anniversary date of the initial inspection. (However, all archived reports will continue to remain archived).

CDI is continuing to regularly review the situation as matters change and develop daily.

SHELL

We have not set a specific change on SIRE validity. We will look at each situation on a case by case basis. We will try to remain pragmatic and aware of the challenges. We would recommend that as a vessel gets closer to the 6-

month SIRE date they should document the efforts they have made to get re-inspected or the challenges they encountered.

P66

These are indeed unprecedented times and we empathize with vessel crews and the hardships they are facing. We want to assure you that we will work with all vessel operators during this difficult period. We have internal controls in place to screen vessels on a case by case basis which includes flexibility on SIRE and CDI inspections.

We encourage vessel operators to have contingency plans in place for all aspects of shipboard operations, not only for vetting inspections but also for stores, spare part supply and Class certification surveys.

All services with shore personnel needs to be kept to a minimum; harmonized with agents as best as possible to avoid un-necessary contact with shore personnel. Understanding and seeking different perspectives is key to finding solutions, so please inform your members to keep up the dialogue with us and their respective charterer's / oil companies.

Our vessel operators and vessel crew have done a tremendous job navigating this situation while also continuing to deliver our commodity and providing energy to the world.

ShipVet Services Ltd

We are already in the process of discussing extensions to the validity of Sire & CDI reports from 6 to 12 months with our clients.

Kuwait Oil Company

We are monitoring the unfolding scenario very closely and will take the necessary steps to ensure safe transportation of cargoes in and out of Kuwait.

LUKOIL

We can assure you that we take into account these circumstances in the process of arranging inspections as per OCIMF SIRE format and will handle each tanker's assessment on the case-by-case basis

AMPOL

At AMPOL we are taking pragmatic approach on this and each vessel is reviewed case by case depending upon vessels overall profile and various factors (available SIRE history, PSC history, Incident records, Terminal Feedbacks and operators' overall profile). We will accept Load port and/or Idle SIRE inspections. Vessel will not be rejected only because of SIRE inspection being more than six months old.

**Received through member*