# POLAR CODE COMPLIANCE: CIC vs HAVEP

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#### ABSTRACTS FROM GUIDELINES FOR THE PSC OFFICER ON IMO POLAR CODE



DURING THE INITIAL PSC INSPECTION, THE PSCO SHOULD VERIFY IF THE SHIP CARRIES A **VALID POLAR SHIP CERTIFICATE** AND, IF SO, THAT THE SHIP ALSO HAS A **POLAR WATER OPERATIONAL MANUAL** (PWOM).

IN ADDITION, THE PSCO SHOULD CHECK THE FOLLOWING:

- SUPPLEMENT TO THE INTERNATIONAL OIL POLLUTION PREVENTION CERTIFICATE (IOPP CERTIFICATE) – FORMS A AND B;
- STANDARD FORMAT FOR THE PROCEDURES AND ARRANGEMENTS MANUAL;
- FORM OF GARBAGE RECORD BOOK;
- SHIPS CARRYING NOXIOUS LIQUID SUBSTANCES IN BULK SHOULD HAVE REMARKS IN THE NLS CERTIFICATE.

If no clear grounds are found during the initial inspection, there is no further need to consider the Polar Code

#### **NOTES FOR THE PSC OFFICER**

 THE PSCO MAY VERIFY THAT THE PWOM CONTAINS PROCEDURES FOR ANY OF THE OPERATIONS SET OUT IN CHAPTER 2 EITHER DIRECTLY OR BY CROSS-REFERENCE TO APPROPRIATE INFORMATION, PROCEDURES OR PLANS THAT EXIST ELSEWHERE IN A SHIP'S DOCUMENTATION.

 THERE IS NO LANGUAGE REQUIREMENT FOR THE PWOM. THE PWOM MAY BE IN A LANGUAGE NOT UNDERSTOOD BY THE PSCO. SIMILAR TO THE ISM DOCUMENTATION, IT IS NOT A HARMONISED PROCEDURE IF THE PSCO LOOKS AT THE DOCUMENTATION ON ONLY THOSE SHIPS WHERE THEY CAN UNDERSTAND THE LANGUAGE.

TRAINING, REFERENCE IS MADE TO CHAPTER 12 OF THE POLAR CODE, MANNING AND TRAINING. THE GOAL OF THIS CHAPTER IS TO ENSURE THAT SHIPS OPERATING IN POLAR WATERS ARE APPROPRIATELY MANNED BY ADEQUATELY QUALIFIED, TRAINED AND EXPERIENCED PERSONNEL.





79 Documents and 468 pages later

Paper safety?

#### **Operational Project** Statistics

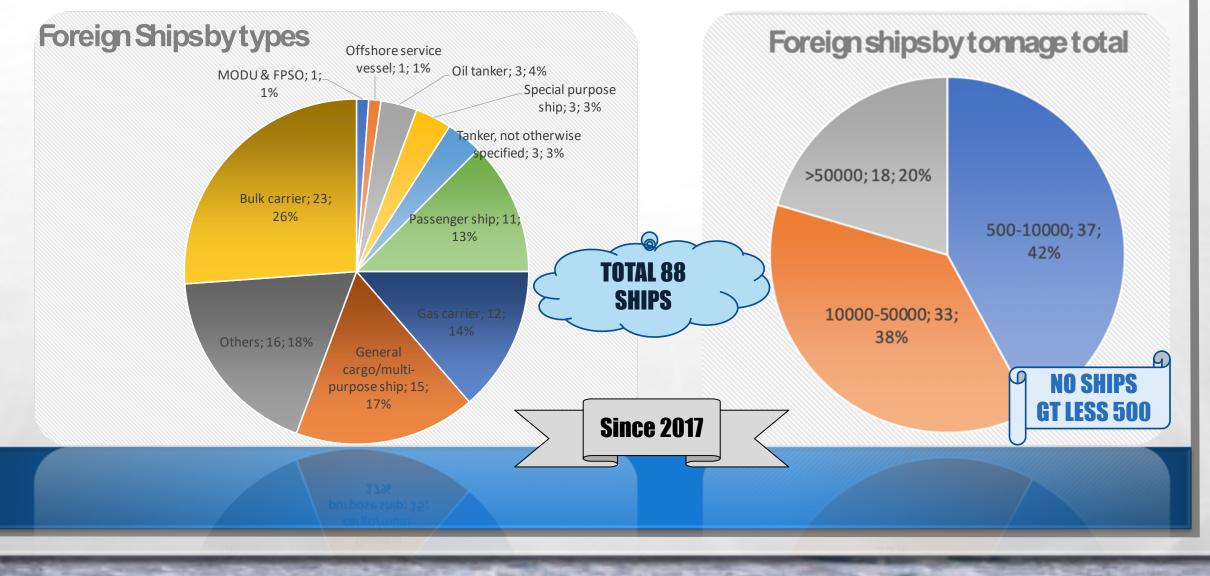
- Project plan totalling 1534 tasks and sub task
- Total time spent 33 months
- 13,000 plus emails generated
- 249 conference and video calls
- 176 individuals consulted
- 49 Individual Organisations consulted
- 23,769 man hours of work undertaken by the team on top of their day jobs

#### **PWOM development**

#### NUMBER OF SHIPS WITH POLAR CERTIFICATE VISITED RUSSIAN PORTS



#### NUMBER OF FOREIGN SHIPS WITH POLAR CERTIFICATE VISITED RUSSIAN PORTS



#### NUMBER OF RUSSIAN SHIPS WITH POLAR CERTIFICATE VISITED RUSSIAN PORTS

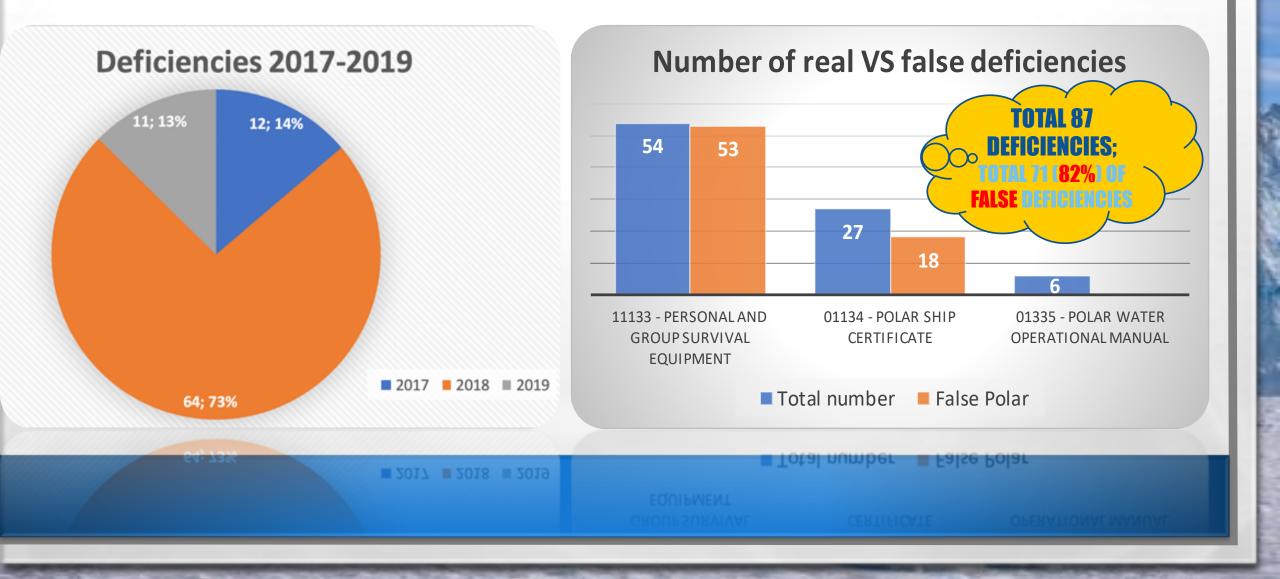


### **DEFICIENCIES WARRANTING DETENTION**

- 2. MISSING OR INCOMPLETE PWOM ✓ obvious
- **3.** MISSING OR DEFECTIVE EQUIPMENT · obvious
- 4. TRAINING NOT APPROPRIATE AND NOT ACCORDING TO THE POLAR CODE ✓ obvious
- 5. OPERATION OF THE VESSEL BEYOND ASSESSED AREA, PERIOD AND THE LIMITATIONS AND CAPABILITIES AS STATED IN THE CERTIFICATE. ✓ Not clear



#### **DEFICIENCIES RELATED TO POLAR CODE: 2017-2019**



## FALSE POLAR DEFICIENCIES: REASONS

- POOR KNOWLEDGE OF POLAR SPECIFICS BY PSC OFFICERS
- RELATIVELY "NEW" IMO INSTRUMENT
- LITTLE PRACTICE, NO TRAINING
- LANGUAGE OBSTACLES
  ✓ For PWOM

A kind of verification program is needed

## WHAT INSTRUMENTS DO WE HAVE?

- PSC CIRCULARS/PSCC INSTRUCTIONS
- MAKCS MARITIME KNOWLEDGE CENTRE
- PSC SEMINARS/EXPERT TRAININGS/ SPECIALIZED TRAININGS
- CIC

**TEMSA** 

• HAVEP



## **INSTRUMENTS WE HAVE: FEATURES**

- PSC CIRCULARS/PSCC INSTRUCTIONS
- MAKCS MARITIME KNOWLEDGE CENTRE
- PSC SEMINARS/EXPERT TRAININGS/ **SPECIALIZED TRAININGS**

✓ Only theory, common aspects



 $\checkmark$  No practice, no communication  $\xi$ 



✓ No real obstacles, circumstances, context



• HAVEP

✓ Practice, real communication, real implementation



## CIC OR HAVEP ON POLAR CODE?



 CONCENTRATED INSPECTION CAMPAIGN OR HARMONIZED VERIFICATION PROGRAMME?

• WHAT FOR THE NON-POLAR COUNTRIES?

• WHAT SHOULD BE CHECKED?

Season? Duration? Polar Countries only or world-wide?

## WHAT SHOULD BE REALLY CHECKED

- POLAR SHIP CERTIFICATE
- PWOM REGARDING ICE MANEUVERING, SURVIVAL ON ICE PROCEDURES, FIRE FIGHTING IN LOW TEMPERATURE, MEDICAL ASSISTANCE IN CASE OF FROST-BITE OR HYPOTHERMIA.
- TRAINING APPROVED BY FLAG STATE, BASIC AND ADVANCED, EXPERIENCE IN ICE FOR STATISTICS ONLY
- PERSONAL AND GROUP SURVIVAL KIT REGARDING QUANTITY AND READINESS FOR USE
- EQUIPMENT APPROPRIATE FOR POLAR TEMPERATURES

## **CIC REQUIREMENTS / FEATURES**

- EVERY YEAR, SEPTEMBER DECEMBER
- 2 TO 3 YEARS TO PREPARE THE CIC
- NO MORE THAN 12 QUESTIONS
- BINDING ALL MOU MEMBERS
- 'IN HOUSE' TRAINING BEFORE THE CIC
- FIXED FORM OF REPORTING
- TIME LIMITATION TO NORMAL INSPECTION

- Duration not more than 3 months;
  Navigation periods? Canada? Iceland?
- In exceptional circumstances a period of not less than 1 year;
- ✓ Really enough?
- ✓ What for Non-Polar Countries? (CIC on Polar code for Greece, Spain, Italy...?!)
   ✓ Priorities for CIC topics? Voting for topics;

**Too complicated**,

rigid procedure...

- ✓ Procedural issues, reporting to IMO/ILO;
  - Not more that 1-hour addition to inspection. Really enough for comprehensive verification?

## HAVEP REQUIREMENTS/ FEATURES

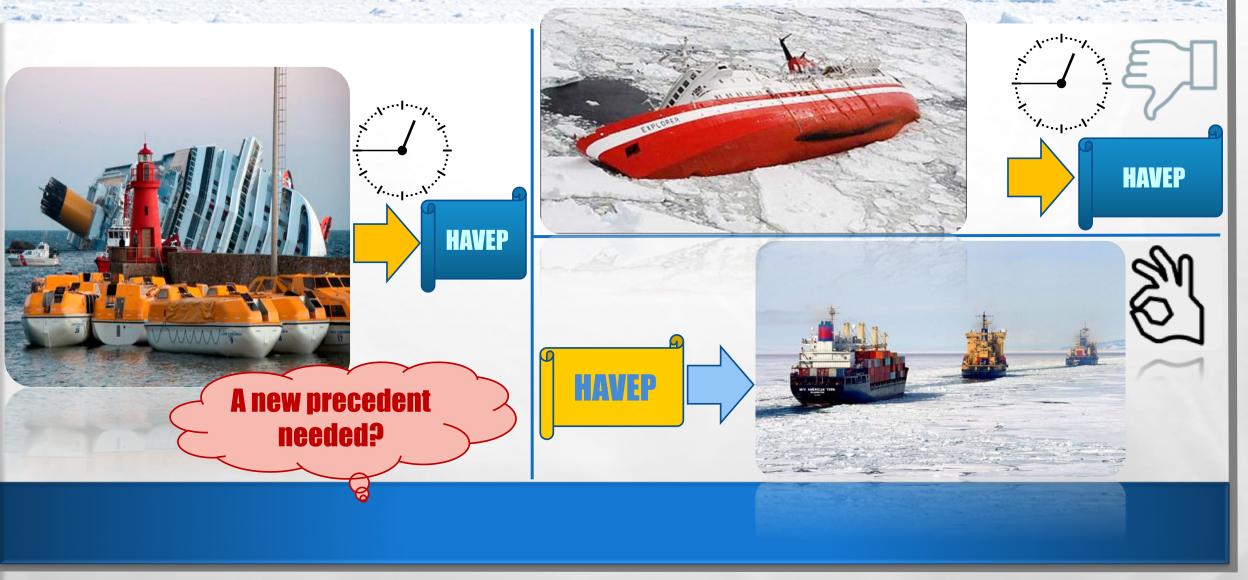
- **1.** DURATION IS CUSTOMIZABLE
- **2.** ON SHIPS ELIGIBLE FOR INSPECTION
- **3.** LIMITED RANGE OF SHIPS, COUNTRIES
- **4.** SHIP NOTIFIED
- **5.** NUMBER OF QUESTIONS
- **6.** ONLY ONE HAVEP DURING THE CAMPAIGN
- 7. MODEL COURSE + 1-DAY TRAINING FOR PSCO

- Navigation periods OK, enough time, no tight deadlines;
- Not interferes with CIC, both can be implemented simultaneously;
- ✓ For interested Arctic Council members;
- ✓ Non-polar countries are not bound;
- ✓ Crew is informed of the planned HAVEP, better attitude;
- Enough time for comprehensive verification;
- More options to identify weak points;
- ✓ No IMO/ILO reporting obligations;

Flexible time limitation, less procedural complexities;

More flexible and pragmatic approach

#### **COSTA CONCORDIA – THE ONLY HAVEP WE HAD**



# FOR ATTENTION

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