

Axel Kahl

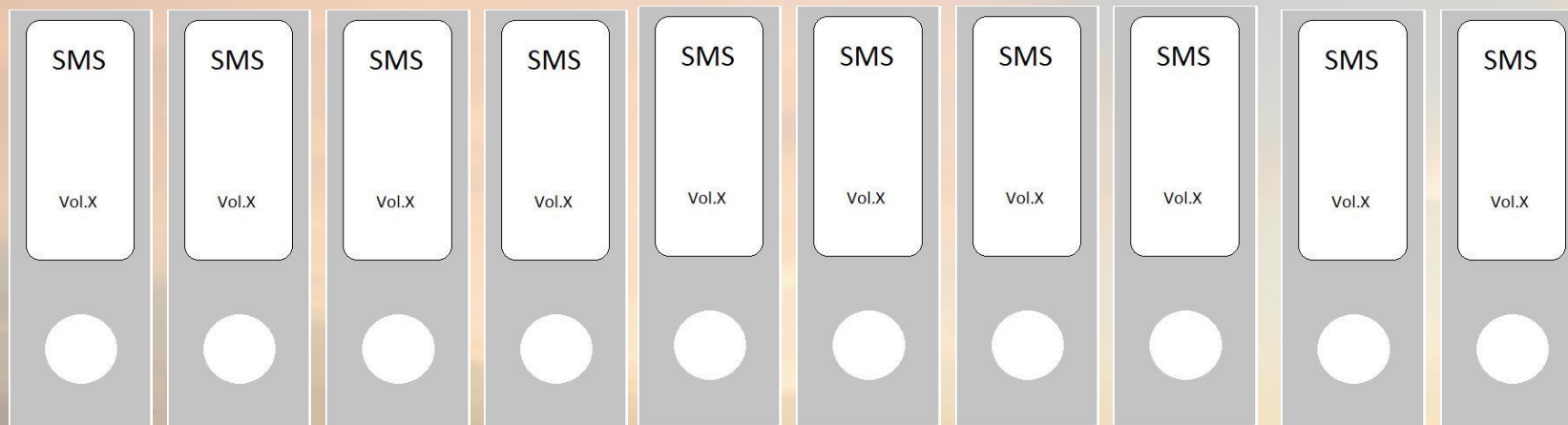
Simplifying the SMS

KIS - Keep It Simple

The SMS

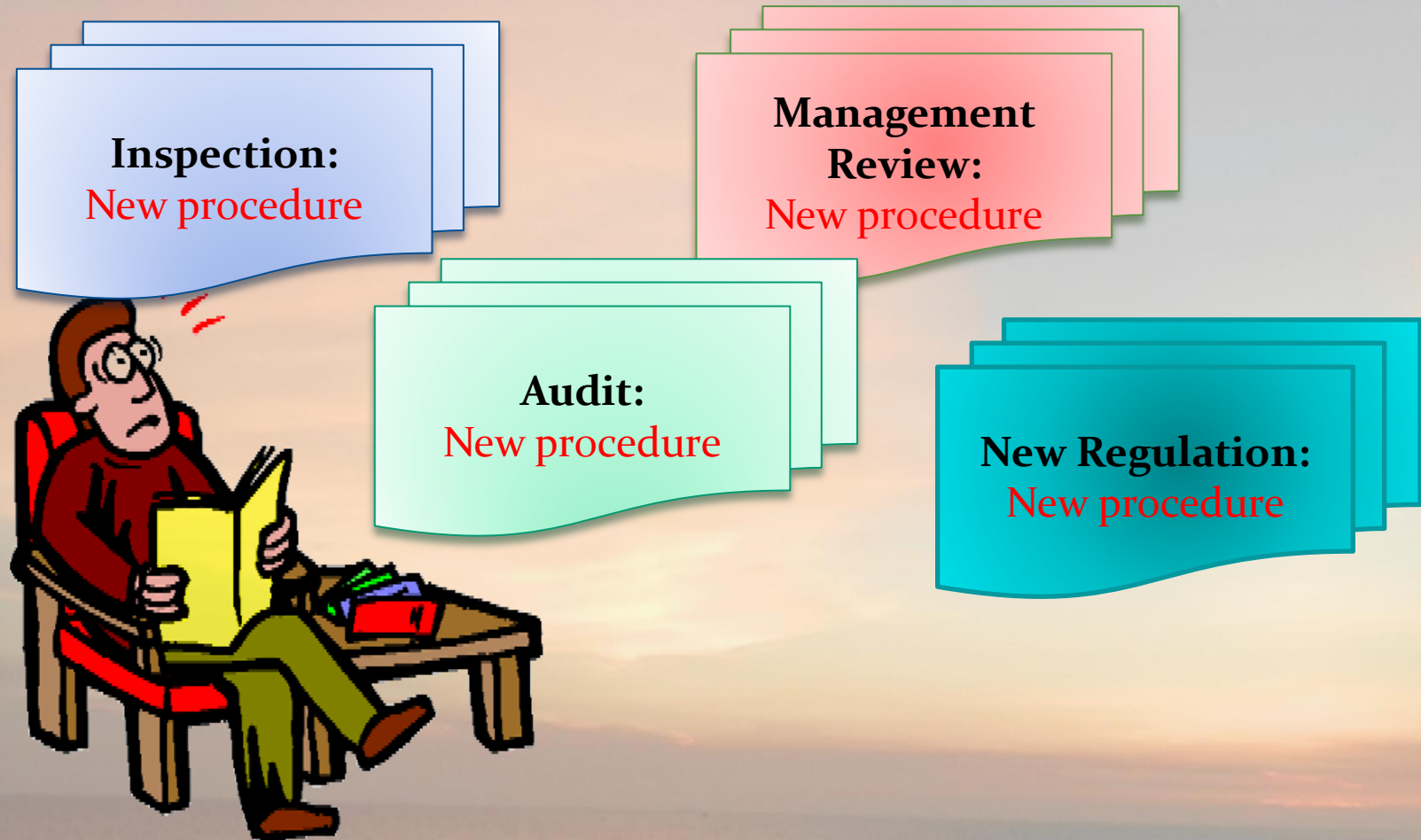
Start of an SMS

In the beginning the SMS has a decent size including procedures and policy's
But during the next years following usually happens:



It is growing

Why it is growing: Another procedure



THE SMS

Written for:
The crew on board.

But does the SMS still reflect the work on board?



Written by:
The team ashore.

When was the person, writing company procedures, last time sailing with company vessels verifying that the procedures are actually correct and practical?

The SMS

Issues when writing or updating a SMS

- **Easy and simple Language:** It must be taken into consideration that a SMS is written for the people on board company vessels and NOT for 3rd party.
- **Avoiding Duplications:** Duplications have been noted in many SMS which makes updating of procedures very difficult. Same will cause contradictions over time.
- **Avoiding Contradictions:** Contradictions and conflicting statements MUST be avoided because same will force the crew to deviate from procedures.

The SMS

Issues when writing or updating a SMS

- **Correct Procedures:** Only if the procedure is reflecting the work on board the vessel correctly, compliance can be expected.
- **Leading by Example:** Only if all shore staff is fully complying with the SMS procedures, it can be expected that the crew will do the same.

If the crew is forced to deviate from a procedure
because same is not correct,

you are loosing control over the SMS!

The SMS

Issues when writing or updating a SMS

Danger of Copy / Paste

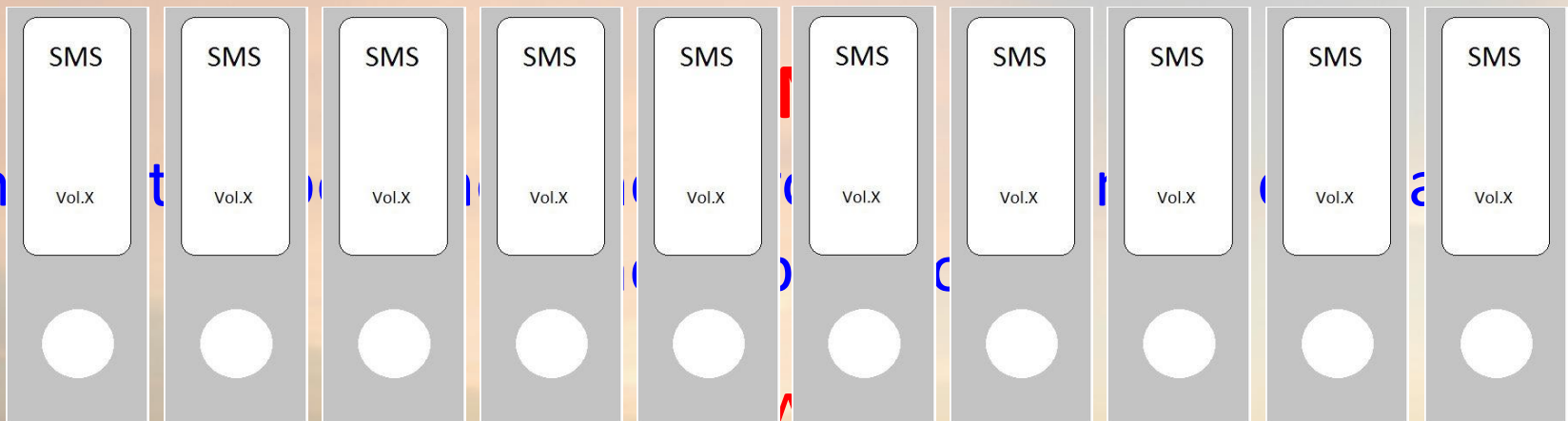
- ❖ **Copy / Paste of Regulations:** Some important items might be copied and included in the SMS BUT: In general it is important to include the interpretation of the company into the SMS rather than a simple Copy / Paste of the documents, also due to the wording of the same.
- ❖ **Copy / Paste of Industry Guidelines:** Same as above!
- ❖ **Copy / Paste of other and 3rd party procedures:** It is essential understanding that procedures are written for the individual company's, vessels and trade. Although similar procedures might be applicable to a certain extend, they will never fulfill YOUR company requirements 100%

Electronic SMS

Can be a great system **IF**

It is User-friendly !

It is Controlled !



AND

What about the size?

It might help to print it out once a year and just measure it.

Risk Management

Are we loosing the focus?

You need to do a Risk
Assessment

Risk assessment

Risk assessment

Risk assessment

Risk assessment

Risk assessment

Risk assessment

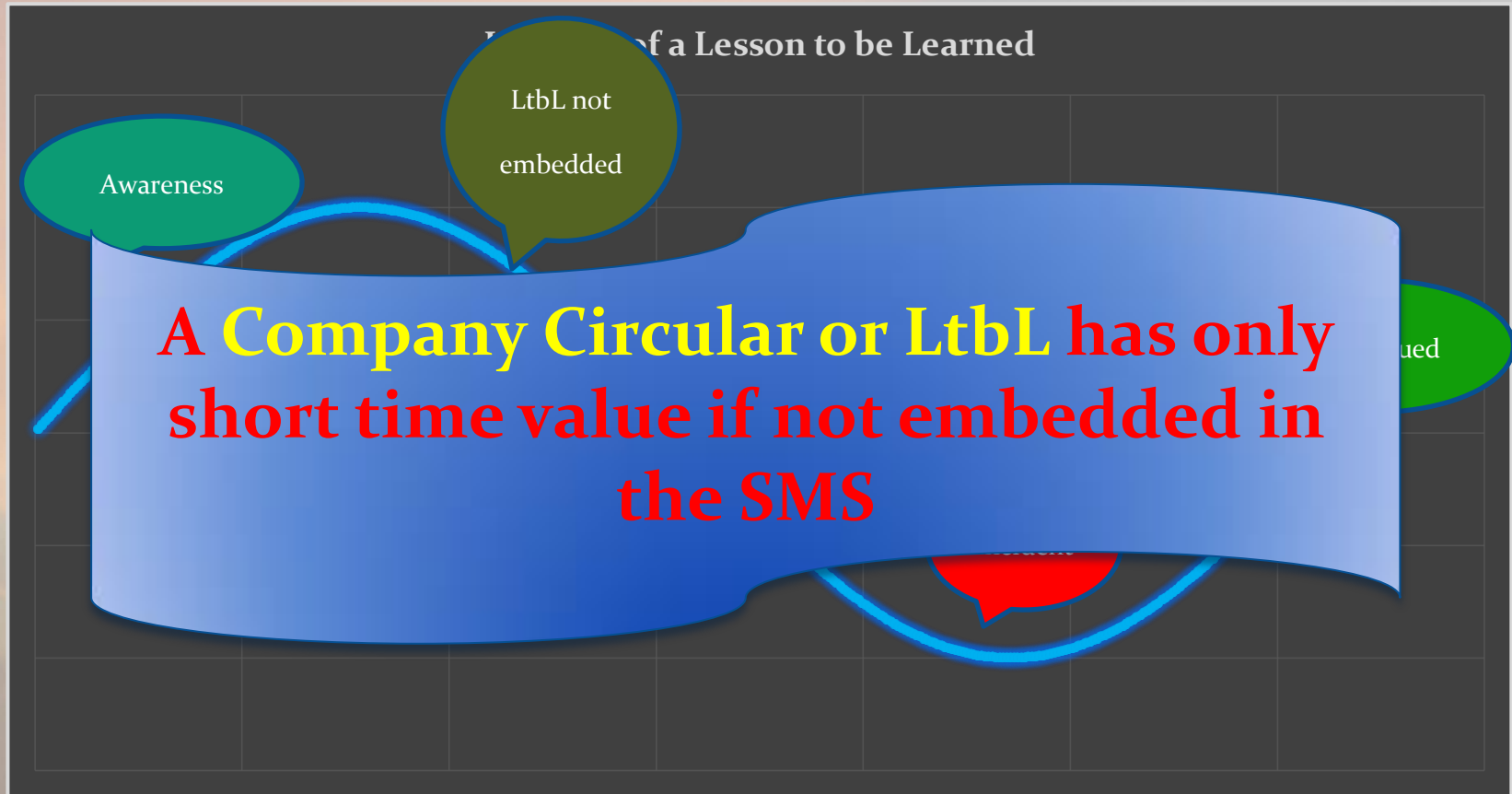
Risk assessment

Risk assessment

Risk assessment

Risk assessment

Company circulars & Lesson To Be Learned



Summary

Why procedures are not followed

- ❖ Too complex Manuals and Procedures.
- ❖ Procedures are disconnected from the work on board.
 - ❖ Wrong interpretation of industry guidelines.
- ❖ Too many Forms.
 - ❖ Poor layout of forms.
- ❖ Too many changes of the SMS due to inspections, audits, reviews and other.

Summary

Why procedures are not followed

- ❖ Lack of training of the company SMS.
- ❖ Procedures are too difficult to understand.
- ❖ Lack of adopting guidance from the seagoing crew.
- ❖ Planned deviation from the SMS due to
- ❖ And

Solutions

Following could be taken into consideration to refresh the SMS:

- ✓ **Masters Review**
- ✓ **Consolidating procedures***
- ✓ **Simplify and reducing Forms***
- ✓ **Embedding Circular Letters in the SMS**
- ✓ **3rd Party Management review***
- ✓ **Re-writing the SMS***
- ✓ **Keep it Simple***
- ✓ **A Company Hazard Register***

Solutions

Following could be taken into consideration to refresh the SMS:

Masters Review

- The Masters SMS review, performed annually, is a very valuable input to the SMS if done correctly (unfortunately not performed always seriously).

Consolidating procedures

- During the time more and more procedures are included in the SMS. A review of the system and consolidating procedures could reduce the SMS by some hundred pages in some cases.

Solutions

Following could be taken into consideration to refresh the SMS:

Simplify and reducing Forms

- **Simplify forms in order that they can be completed and understood easily.**
- **Review the forms annually if they are still needed.**

Circular Letters

- **Circular Letters are popular to include new guidance and processes in short time. However, after 12 month the circulars should be either embedded in the SMS or removed.**

Solutions

Following could be taken into consideration to refresh the SMS:

3rd party Management Review

A 3rd party management review performed by a consultant might provide a independent view of the SMS.

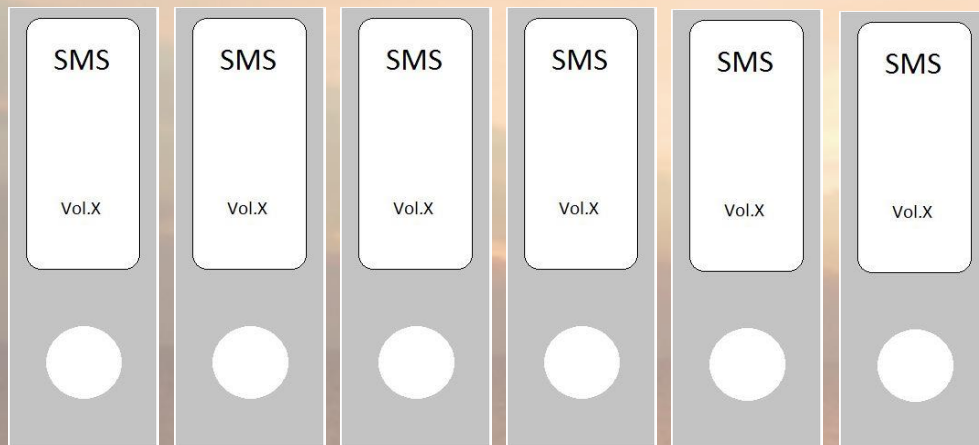
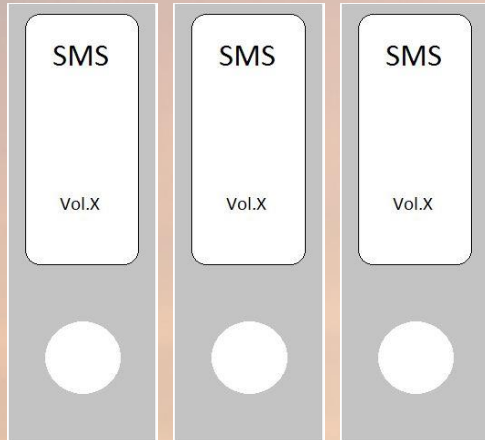
Re-write the SMS

After a couple of year the SMS has been updated various times and a certain point a company might like to consider re-writing the SMS

Solutions

KIS = KEEP IT SIMPLE

Procedures could contain only a couple of pages and an executive summary on the first page



All other
information
Guidance &
could be filed
Additional
in additional
Information
Information

Solutions

A Company Hazard Register

may capture many occupational health and standard operations, such as :

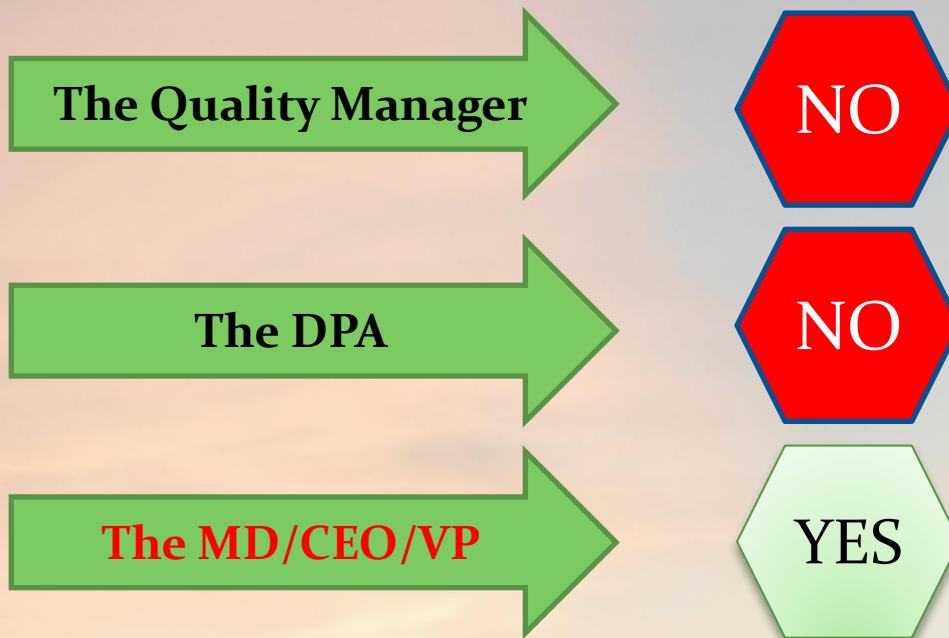
- General Shipboard Operations
 - Deck Department
 - Engine Department
 - Navigation
 - Weather
 - Inert Gas
- Cargo Operations (Oil, Chems, Gas, Dry)

Example for a Company Hazard Register

Company Hazard Register List

Hazard	Location	Threat	Top Event	Potential Consequences	Potential Risk				System Controls in place	Technical Controls in place	Actual Risk				ALARP	Responsible for verification	Accountable for verification	Example Reference				
					L	M	H	S			P	A	E	R								
Section 8 - General shipboard operation and Fall																						
Vessel access	In Port At Pilot station At anchor	Slippery surface Equipment failure Maintenance failure Poor lighting Human error Lack of PPE Moving vessel	Loss of control (Fall) Health Hazard	Injury Disability Fatality	D	4	B	1	B	1	C	1			D	B	B	C	Yes			
Falling from height (>2m)	At any time	Slippery surface Equipment failure Maintenance failure Poor lighting Human error Lack of PPE Moving vessel	Loss of control (Fall) Health Hazard	Injury Disability Fatality	D	4	B	1	B	1	C	1			D	B	B	C	Yes			
Slips and Fall General	At any time	Slippery surface Equipment failure Maintenance failure Poor lighting Human error Lack of PPE Moving vessel	Loss of control (Fall) Health Hazard	Injury Disability Fatality	D	3	B	1	B	1	C	1			D	B	B	C	Yes			
					L	M	H	S						L	M	H	S					
Hazard	Location	Threat	Top Event	Potential Consequences	Potential Risk				System Controls in place	Technical Controls in place	Actual Risk				ALARP	Responsible for verification	Accountable for verification	Example Reference				
					P	A	E	R			P	A	E	R								
Section 9 - Cargo Operations Chemical (Reactive)																						
Self-reactive Loading / Discharging	At sea (STS) and in port	Human error Lack of awareness Storage failure Inadequate PPE Maintenance failure Equipment failure	Loss of primary containment (Reaction)	Injury Fatality Pollution Fire & Explosion Asset damage	B	3	B	2	B	2	B	3			B	B	B	B	Yes			
Self-reactive Transit	At any time	Human error Lack of awareness Storage failure Inadequate PPE Maintenance failure Equipment failure	Loss of primary containment (Reaction)	Injury Fatality Pollution Fire & Explosion Asset damage	B	3	B	3	B	1	B	3			B	B	B	B	Yes			
Self-reactive Tank Cleaning	At any time	Human error Lack of awareness Storage failure Inadequate PPE Maintenance failure Equipment failure	Loss of primary containment (Reaction)	Injury Fatality Pollution Fire & Explosion Asset damage	B	2	B	1	B	1	B	3			B	B	B	B	Yes			
Water-reactive Loading / Discharging	At sea (STS) and in port	Human error Lack of awareness Storage failure Inadequate PPE Maintenance failure Equipment failure	Loss of primary containment (Reaction, Contact to product)	Injury Fatality Pollution Fire & Explosion Asset damage	B	3	B	2	B	2	B	3			B	B	B	B	Yes			
Water-reactive Transit	At Sea	Human error Lack of awareness Storage failure Inadequate PPE Maintenance failure Equipment failure	Loss of primary containment (Reaction, Contact to product)	Injury Fatality Pollution Fire & Explosion Asset damage	B	4	C	5	C	2	C	2			B	C	C	C	Yes		Sun Wing (2015)	
		Human error Lack of awareness		Injury																		

Who usually signs off the SMS?



BUT do you know what you do not know?

Thank you

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SMS