

GSR Services

Experts for compliance with HKC and EU-SRR in the maritime industry

- IHM development for new and existing ships
- IHM-Maintenance

2021-08-30

- MD-Management & Development
- 1st Aid for incoming MD-requests
- Compliance & Improvement Projects
- Sustainable Ship Recycling Planning
- Trainings and Workshops



EU: Antiwerp, Bremen, Diemenhaven, Cadiz, Gibraita Gion, Hamburg, Piraeus, Jallinn China: Shanghai Chile: Caldera / Vaiparaso Egypti: Suce Estonia: Tallinn India: Alang / Shanagar Malaysia: Kuala Lumpur Singapore South Korea: Busan Turkey, Istanbul

Legislation

REGULATIONS -

Services

Ships > 500GT need to have a ship specific certified and maintained IHM – Part I if:

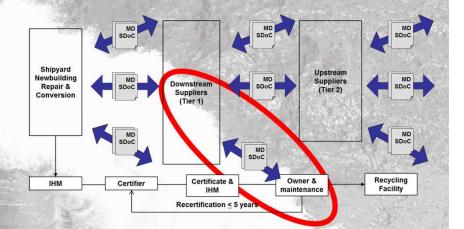
- EU flagged
- Visiting an EU-port (regardless of flag)

Shipowners have to

- Nominate a "Designated Person"
- Establish a maintenance system

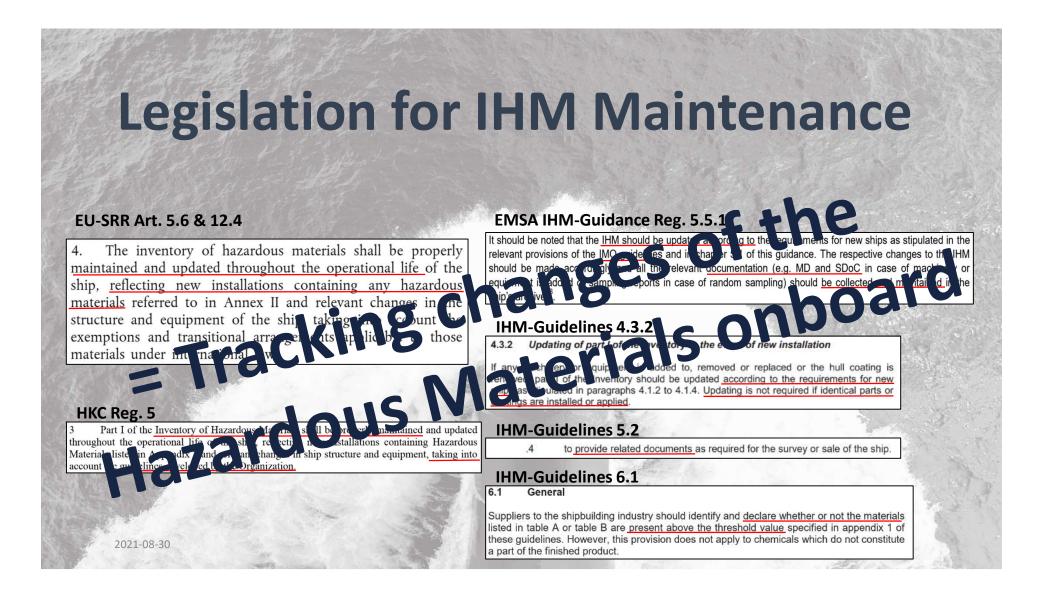
Responsibilities for IHM – Part I

- IHM-Development:
 - Newbuilds: shipyard
 - Existing ships: owner
- IHM-Maintenance:
 - By owners
 - On hand of Supplier documents



Services

2021-09



IHM Maintenance

- Tracking of changes of Hazardous Materials in structure and equipment of a ship ...
- ... on hand of documents from suppliers ... for the whole life of a ship.
- Validity of IHM as long as the ship exists
- Validity of supplier documents as long as product exists onboard

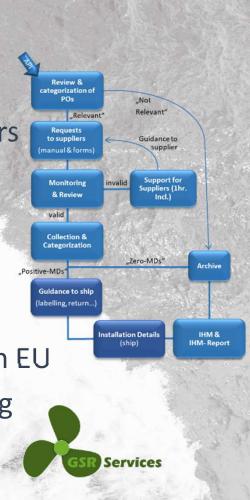


Reliability

Maintenance-Process

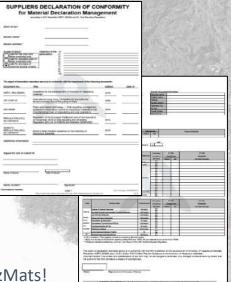
- Requesting documents from <u>relevant</u> suppliers
- Review of documents received

- Tracking of Hazardous materials onboard
- Making changes in certified IHM (copy)
- Updating of IHM-Maintenance report
- Provision of documents for PSC-inspections in EU
- Re-certification of IHM < 5 years by class / flag



Suppliers role

- Provision of
 - 1. "Suppliers Declaration of Conformity" (SDoC)
 - Company specific!
 - Legal statement overtaking responsibility for information provided in MDs
 - 2. "Material Declaration" (MD)
 - Product specific!
 - Information on presence of HazMats
 - "Group MDs" possible in case of identical contents / absence of HazMats!
 - Required also, when no HazMats are contained
 - All suppliers depend on information from own suppliers!



2021-08-30

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Incompliances & Penalties

- IHM-incompliance of ships:
 - no IHM
 - not certified or re-certified
 - IHM not reflecting materials onboard
 - not properly maintained
 - no procedure for maintenance

Penalties

- France: 100k EUR or 1-year imprisonment (Code des Transports, Art. L5242-9-2)
- UK: "financial penalty" and up to 2 years imprisonment (Ship Recycling Regulation 2018, Reg. 11)
- Norway: "fines" or imprisonment not exceeding two years (Ship Safety and Security Act, Sec. 33 and 64)





Basics of IHM-Compliance

- Knowledge required:
 - Scope of IHM-maintenance & legal aspects
 - Utilization of exclusions is key to efficiency
 - Compliance data exchange principles
 - Ensuring liabilities throughout supply chains



Workload vs. Exclusions

- IHM-scope and exclusions on all levels ensures efficient compliance
 - Purchaser Supplier
 - Supplier Sub-Supplier
 - Manufacturer Supplier

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A comparison

•1 Owner
• Same ship type
• Same period
•2 different Service Suppliers

Difference in numbers				
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Order Items for ship	4.8	and the second second		

Difference in numbers			
		GSR Service	
Unnecessary MD-Requests	2.665	0	
MDs collected	36 (relevant = 4)	226 (2 missing)	
Compliance Level	1,76%	<u>99,42%</u>	
2021-08-30		and the second	



Conclusions

- Selection of PO-items & support = main efficiency factor
 - IHM Experts are not Maintenance Specialists
- All ships need documents from suppliers
- Penalties and risks are severe
- Digitisation only way to manage data volumes
- Be aware of the many shiny solutions!

IHM Expert

Maintenance Specialist

Conclusions

- Compliance Data Management is a new for the industry
- Constant efforts are required
 - Suppliers, shipyards, shipowners / crew
- No common understanding and approach established
- Selective approach essential for compliance
- Suppliers struggle most due to avoidable workload caused by "IHM Experts"



Contact

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Our KPIs for IHM-Maintenance

- Average of relevant order items: 4,7%
- Average "Positive MDs": ~ 1 to 2%
 - Only 0.05% to 0.09% of items to be tracked by crew onboard!

The magic behind every outstanding performance is always found in the smallest of details

Gary Ryan

- Our clients' advantages
 - Clients risk & liability: for onboard activities only
 - True costs = service fee + clients time + risk

GSR Services

Our experience in numbers

Services

- IHMs developed: 600+
- IHM maintenance projects: 400+
- IHM-categorized Line Items: 65.000+ (supplier catalogues)
- Evaluated Line Items (IHM-Maintenance): 1.8mio+
- Automatic categorization rules: 2.000+
- Certified IHM Experts: 52 (globally)
- IHM Experts trained: 100+
- In-house IHM Maintenance Specialists: 8
- Claims: 0
- Years of experience: 35+