## STS cargo transfer service providers audit proposed

On the back of continuous growth of ship-to-ship (STS) transfer operations globally in recent years, new local STS service providers have sprung up to provide totally new trading/lightering needs, or to compete with existing organisations.

n this specific industry sector, competition can encourage the emergence of low cost, sub-standard STS providers to the detriment of both the industry and the environment and with negative implications for the worldwide standing of the industry.

These companies are able to survive and expand, as there are no adequate resources in place from their contractors, to evaluate their performance prior to or after each STS operation, DYNAMARINe claimed.

Tanker operators cannot directly influence the appointment of STS service providers, since it is the responsibility of the trader/ charterer, or cargo receiver, yet have to take full statutory liability and contractual responsibility for the operations thereby subsidising the sub-standard providers by protecting them from any liability.

DYNAMARINe has proposed an auditing scheme\*, based on IMO's SOLAS and MARPOL regulations, OCIMF Guidelines, relevant ISO standards and OSIS data.

It is important that the STS service provider's management system is consistent and follows the latest industry standards, the company said, as evidenced by OCIMF's TMSA.

In addition to the review of the management system, the audit will include a visit to the service provider's hubs to verify the condition of the equipment, it's storage and maintenance facilities and consistency with the approved management plan.

Through an assessment tool provided by DYNAMARINe, the Master will evaluate the STS service provider's service quality after each transfer operation.

Ship operators maintain a transparent system, regularly audited along with TMSA audits by oil majors, based strictly on statutory requirements, environmental protection and safety criteria, the company pointed out.

## Master's feedback

A Master's feedback reported to DYNAMARINe's OSIS network will be used during the audit and any issues arising will be discussed, as will issues about location assessment and information will be exchanged enabling tanker operators to be aware and prepared for any hazards, as well as available resources.

A tanker operator's direct involvement starts from the nomination of the provider by the charterer until the commencement of the STS operation - usually between two hours and two days.

They cannot choose a STS service provider, however they have the right to reject the services of a third party on the basis of environmental protection and operational safety.

## **Report validity**

The validity of the final audit report is linked to the feedback available through OSIS and may be extended or withheld accordingly. The approval may be terminated when there is evidence, or strong indications, of inconsistency or non-compliance with the requirements of the tanker operator, or the IMO/OCIMF guidelines.

DYNAMARINe explained that the intention is to make available a list of approved STS service providers that satisfy an agreed set of minimum criteria regardless of their area of operation. This process should take place under a standardised auditing regime applying to all STS service providers and undertaken by an independent organisation established to avoid the risk of any conflict of interest.

Only a small percentage of charterers have the resources available to ensure that contracted STS service providers provide high quality services to tanker operators with respect to safety, reliability and efficiency.

These audits are not transparent and the results are not available.

The fact that a contract is in place, indicates that a due diligence process has been undertaken on behalf of the charterer. Evidence indicates that this is not enough for the tanker operator who ultimately bares overall responsibility for the individual cargo transhipment.

There are mutual benefits for those STS stakeholders who support and participate in this audit scheme, the company claimed.

For example, charterers/traders/cargo owners will appoint STS service providers on the basis of the satisfactory outcome from the minimum baseline criteria and subject to the examination of a report that will be provided by the STS service provider.

STS service providers will receive a report on the outcome of the audit and will, if they wish, be able to circulate the findings to current or potential clients as a clear independent indication of the quality of their management systems and procedures.

Tanker operators will receive confirmation that an audited STS service provider satisfies the base line criteria and will provide the expected service to the vessels involved in accordance with industry regulations and requirements.

Illustrating the expansion of STS, the Port of Salalah announced that it recently completed its first STS at the anchorage.

The new service was performed by Fendercare Marine, which transferred vegetable oil from the 2011-built MR 'NCC Nasma' to 'Ariana' while both vessels were in the harbour anchorage.

\*The proposed scheme will be discussed in the upcoming International Forum on STS (IFSTS 2018) to be held in Athens on 7th March.