



SIRE 2.0 - Draft Inspection Report Validation: Best Practice

Version 1.0

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Purpose

To provide Submitting Companies with an overview of best practice for checking and validating SIRE 2.0 draft inspection reports before they are published in the SIRE 2.0 programme database.

1 Introduction

Submitting Companies are obliged to verify that the reports uploaded to each programme website meet the relevant OCIMF inspection programme requirements.

Vessel inspection reports underpin the OCIMF inspection programmes and it is vital that every report is accurate and complete. Reports must provide the necessary factual information to enable the reader to assess the risk of using the vessel that has been inspected. This paper provides best practice guidance on the process to check and validate a SIRE 2.0 draft report before publishing it to the SIRE 2.0 programme database.

Inspectors write OCIMF inspection programme reports to describe the condition of the vessel at the time of inspection. These reports are read by a variety of Submitting Companies, Programme Recipients, and approved Third Party Vetting Contractors. The reader is often unfamiliar with the vessel, operator, or region where it was inspected. While the inspector should write concisely, the description should not fall short of clearly identifying the intent of an observation or negative observation.

Submitting companies must have a process for draft report validation. It is recommended that this includes internal guidance on the following four possibilities:

- No concerns – the draft report can be released.
- Minor editorial issues that do not affect the accuracy of the draft report – the draft report can be released with internal follow up with the inspector.
- Major editorial issues or any factual concerns that affect the accuracy of the draft report – the draft report must be resubmitted.
- Factual concerns, widespread major editorial issues or unsubstantiated inspector opinion that make the report unreliable – draft report withdrawal and internal investigation.

Submitting Companies must recognise that Programme Recipients can provide feedback to OCIMF on the content and quality of an inspection report. See the warning in section 14.

2 In-house expertise and experience

A submitting company should consider the below as minimum qualifications and experience for in-house personnel responsible for reviewing and validating SIRE 2.0 draft inspection reports:

Qualifications:

- Master Certificate of Competency from a recognised Flag State for ships of 3,000 gross tonnage or more; or
- Chief Engineer Certificate of Competency from a recognised Flag State for ships powered by main propulsion machinery of 3,000kW propulsion power or more.
- A minimum of five years' service as a certified officer on board oil, gas or chemical tankers.

Knowledge and skills:

The following knowledge and skills are recommended in relation to the SIRE 2.0 inspections and type of vessel(s) to be reviewed and validated by in-house personnel:

- Advanced technical specialist knowledge.
- Understanding of chartering, operations, vetting and OCIMF SIRE 2.0 inspection – including the inter-relationships between:
 - Charterers and Operators
 - Submitting Companies, OCIMF Accredited Inspectors, and Inspection Companies/ Consultancies.
- Awareness of current and future international regulations, conventions and codes - including MARPOL, SOLAS, and STCW.
- Awareness of relevant OCIMF/industry publications.
- Awareness of Human Factors and its application to safe and environmentally responsible operations.
- Strong knowledge of SIRE 2.0 policies, procedures and guidance documents.
- Experience in OCIMF Tanker Management Self Assessment (TMSA) programme.
- Experience in ISO/ISM audits or similar reviews.
- Ability to make an objective assessment of a SIRE 2.0 draft inspection report generated from a Compiled Vessel Inspection Questionnaire (CVIQ) submitted by an inspector - and to provide feedback to the inspector and OCIMF.

3 The SIRE 2.0 Programme inspection report

The SIRE variant concept has been discontinued for the SIRE 2.0 Programme and has been replaced by an automated question selection process based on:

- Vessel type.
- Vessel outfitting.
- Information provided through the HVPQ and PIQ.

Not all questions that may be applicable to a particular vessel will be assigned to an inspection and included in the Compiled Vessel Inspection Questionnaire (CVIQ), instead a risk-based approach has been taken:

- **Core Questions** – always included if applicable to a vessel type and specialisation.
- **Rotational Questions** – periodically included if applicable to a vessel type and specialisation.
- **Conditional Questions** – may be included in the core or rotational question pool for a vessel if information provided by the vessel operator makes them relevant at the time of the inspection.
- **Campaign Questions** – additional questions that will be treated as a core question for a limited period of time.

If a vessel operator has provided inaccurate information related to a vessel's type and/or specialisations during the vessel registration or inspection booking processes, a few inappropriate questions may be included in the CVIQ while a few appropriate questions may be excluded. While inconvenient, this will not diminish the value of the inspection report unless the completely wrong vessel type is selected, which should be identified by the inspector as they complete the pre-boarding phase of the Uniform Vessel Inspection Procedure. If such a circumstance occurs, the inspector must notify the submitting company, which can either arrange with the vessel operator to cancel the existing booked inspection and request a new inspection using the correct vessel type or cancel the inspection entirely.

Where an inappropriate question is included in a CVIQ, the inspector will use the 'not answerable' response to identify the reason why the question was included.

4 Draft inspection report - general checks

The first step for a submitting company when reviewing a draft inspection report is to check that the information included on the front cover and in section 1 – Vessel, Operator and Inspection Particulars is populated and apparently correct. All information is populated automatically and is derived from the following:

- A vessel's HVPQ and PIQ.
- A vessel's SIRE registration core data.
- The inspection booking.
- The inspection editor by activity tracking and inspector selection from predefined lists.

The inspector is not required to enter any vessel or vessel operator related data in the CVIQ (questionnaire) for inclusion in the final inspection report.

Warnings

The vessel operator is solely responsible for providing accurate data at vessel registration and during the inspection request process. Once the operator declarations have been made during the SIRE 2.0 pre-inspection element, operator supplied information cannot be corrected without cancelling the inspection and booking a new one.

Should inaccurate information provided by the vessel operator render the draft or published inspection report unreliable or misleading, the only option is to withdraw the report.

Verify that the topsides inspection was done in daylight or that the proper permission was given to inspect in darkness.

The inspector's boarding and departure times should be consistent with the vessel operations and the time needed to carry out the inspection.

If the inspection was conducted using either the full or partial paper based contingency inspection process, verify that the inspector had received the necessary permission in accordance with the submitting company's internal processes. If the necessary permission was not provided before the inspection commenced, the matter should be investigated internally.

5 Acceptability of inspector photographs

SIRE 2.0 enables an inspector to supplement an inspection observation or negative observation with photographs, which may help a report recipient to understand and evaluate the situation being reported on.

Inspector photographs included in a SIRE 2.0 report must comply with *SIRE 2.0 - Rules for use of the Tablet Camera and Voice Recorder – Version 1.0* as follows.

When taking photographs to support observations during the inspection it is important that the inspector does not include any of the following in a photograph:

- *Any people.*
- *Any document or logbook unless to specifically support a documented observation.*
- *Any document or logbook displaying personal or company specific information.*

- *The port facilities.*
- *Terminal facilities except:*
 - *The marine loading arm or hose connection inboard of the ship's rail and then only to include sufficient detail to support an observation relating to the ship/shore interface under the joint control of the ship's crew and terminal.*
 - *The means of access to the vessel and then only to include sufficient detail to support an observation relating to safe access under the control of the ship's crew.*
- *Anything that the Master states is restricted in accordance with documented company procedures.*

Where an inspector photograph violates the rules, the photograph must be removed from the report.

The vessel operator remains solely responsible for the content of the standard set of photographs uploaded to the photograph repository for inclusion in the final inspection report.

6 Mandatory comments to questions

SIRE 2.0 does not require the inspector to make any mandatory comments related to vessel data collection.

However, SIRE 2.0 does require that an inspector provides detailed:

- Negative comments for every negative observation which provides context to the situation being reported through the appropriate negative observation module.
- Comments to every human observation that *exceeded expectations* (considered as a positive observation) and that was *largely as expected*.
- Comments to every process observation that was *largely as expected*.

The inspection editor software prevents an inspector from submitting a report unless all mandatory negative comments and comments have been entered.

7 Additional comments

SIRE 2.0 has no facility or requirement for inspectors to provide additional general comments at the end of each CVIQ chapter. Inspectors must provide all observations and negative observations through the questions assigned to the CVIQ in accordance with the guidance provided in [SIRE 2.0 Programme Introduction and Guidance – Version 1.0 section 3 – Using the CVIQ and Inspection Editor application](#).

8 Language and grammar

All reports must be written clearly and concisely in the English language.

All comments and negative comments in a report shall be free of major spelling, grammar and typographical errors, particularly if they could be seen to change the meaning of the text.

Verify that the inspector has written the comments and negative comments as a third-person narrative, i.e., without using 'I' or 'we', and that all comments and negative comments are written in the past tense.

Inspectors should describe what they witnessed on board without opinion, speculation or subjectivity. The inspection report must give an objective, unbiased view based on what was seen at the time of the inspection. The comments and negative comments should have a

neutral tone throughout.

9 Objectivity

The SIRE 2.0 inspection editor is programmed to ensure that an inspector always provides the required data input for each CVIQ question and its assigned response categories.

Although the software can ensure that data inputs are made where required, there is no artificial intelligence to verify that the entries are accurate, logical, or appropriate to the question.

All chapter 2-10 and 12 SIRE 2.0 questions will be assigned one or more of the following response categories:

- **Hardware:** Refers to vessel structure, machinery, outfitting, or equipment.
- **Process:** Refers to vessel procedures or documented processes.
- **Human:** Refers to the familiarity of vessel staff with a company procedure, written process or the use or operation of machinery or equipment.

It is important that a reviewer checks that the inspector has used the correct response category to classify a negative observation that they are reporting on.

A **hardware negative observation** is reporting on a defect or deficiency relating to vessel structure, machinery, outfitting, or equipment and **not**:

- How familiar the crew are with the machinery or equipment.
- The existence of a procedure to use or operate machinery or equipment.

A **process negative observation** is reporting on the absence of, or deficiency in, a procedure required to carry out a task or operator machinery or equipment and **not**:

- A defect to deficiency to relating to vessel structure, machinery, outfitting, or equipment.
- The familiarity of the crew with an available procedure.
- The failure of the crew to follow an available procedure.

A **human negative observation** is reporting on the lack of familiarity of the crew with a company procedure, written process or the use or operation of machinery or equipment and **not**:

- The absence of, or deficiency in, a procedure required to carry out a task or operator machinery or equipment.

A lack of familiarity may manifest itself as failure to complete a task in accordance with a documented procedure such as completing a checklist or creating a plan and will often be identified by review of recent vessel records. Where a review of records indicates that a procedure was not followed, the Subject of Concern (SOC) will be reported as either a deck or engine department historical task and not against a rank grouping.

A **human positive observation** is reporting an unusually high level of familiarity demonstrated by a crewmember with a company procedure, written process or the use or operation of machinery or equipment.

All chapter 11 SIRE 2.0 questions will be assigned the following response tool:

Photo Comparison: Refers to the condition of the vessel as observed during the physical inspection compared to the standard photographs provided by the vessel operator.

Each negative observation will also include a **Subject of Concern (SOC)** and **Nature of Concern (NOC)** to allow proper classification of negative observations and, subsequent datamining against, individual inspections, all inspections within a fleet and, all inspections submitted to the SIRE 2.0 database.

The document [SIRE 2.0 - Negative Observation Module Explanation - version 1.0](#) provides more detail on the structure of negative observations and the SOC and NOC classifications available for each observation and negative observation.

The document [SIRE 2.0 Programme Introduction and Guidance – Version 1.0 section 3 – Using the CVIQ and Inspection Editor application](#), provides definitive guidance on how an inspector is required to complete a CVIQ during an inspection.

The review should consider the observations and negative observations provided for each question and verify that:

- The comment or negative comment:
 - Relates directly to a top-level question and its supporting guidance.
 - Includes relevant details of the conditions found on the vessel, giving readers a clear and meaningful description of the conditions and issues as witnessed at the time of inspection.
 - Relates correctly to the response category (response tool) in which it was reported – i.e., a hardware issue being entered in the process or human category (response tool).
 - Refers to a crewmember as the **observed person** or by the acceptable abbreviation **OP**.
 - Does not include the rank, name or any other identifier of an observed person.
 - Is objective, without opinions, speculation or subjectivity.
 - Does not offer recommendations or advice to rectify any of the negative observations made in a report.
 - Does not refer to any existing or potential charter activity.
- The Subject of Concern (SOC) and Nature of Concern (NOC) selections:
 - Are reasonable when considered in conjunction with the top-level question and supporting guidance.
 - Are reasonable when considered in conjunction with the comment or negative comment.

The inspector's comments must never be seen to indicate a partial or overall suitability or rating of a vessel or onboard practice.

Comments and Negative comments included in a report must not refer to any existing or potential charter activity.

10 Observation and comment accuracy

Submitting companies should ensure that inspectors do not enter a comment to an “as expected” observation unless it adds value to the report.

The document [SIRE 2.0 Programme Introduction and Guidance – Version 1.0](#) - section 3.3 *Addressing a potential negative observation where a specific question is not allocated to the VIQ*, provides detailed guidance on how an inspector should address safety issues observed during an inspection that is not directly related to any of the questions included in the CVIQ:

The SIRE 2.0 inspection process requires that the inspector takes time to interview vessel staff, review documented evidence and visually inspect structure, machinery or equipment to verify that the subject matter addressed in each top-level question is effectively managed. The increased emphasis on the human element and understanding the reasons for any negative observations means that there is only time for a limited

number of questions during a standard inspection.

The inspector is required to inspect most areas of a ship to address all core questions and will, from time to time, come across situations where a negative observation may be warranted, but where the natural rotational question is not included in the CVIQ.

The emphasis of the SIRE 2.0 inspection process is placed on verifying that the vessel staff and vessel operator are managing the vessel in accordance with company procedures and guidance provided by OCIMF publications, including TMSA KPIs and best practice guidance.

Several core questions have been developed to leverage the requirements of stage one and two KPIs across the various elements to verify that procedures are in place to manage key requirements.

The SIRE 2.0 programme is focused on the effective management of defects, onboard procedures, and crew familiarity with the tasks they perform.

Inspectors will usually be able to report on any safety-related issues observed during an inspection using the guidance provided in the balance of the partially quoted section.

11 Report detail level and report padding

There is a balance between the correct level of detail to describe conditions found on board and ‘padding’ reports with excess wording.

If the report has excessive or repetitive comments, consider asking the inspector to amend all the relevant comments before publishing.

When it is found that comments and negative comments repeat the question or guidance and do not add value to the report, member companies must review the issue with the inspector. The same inspector comment or negative comment must not be repeated throughout a report.

12 Reporting a defect or deficiency in more than one response category or question

The document [SIRE 2.0 Programme Introduction and Guidance – Version 1.0](#) section 3.4 - *Recording negative observations in multiple observation modules within a single question and across more than one question* states:

The SIRE 2.0 Question Library has been built on the principle of barrier management with the purpose of identifying when a failing in a task, procedure, or item of structure, machinery, or equipment could result in a potential weakening of a barrier. The identification of an apparently isolated negative observation can potentially identify many weaknesses or failures across several systems or processes across a vessel and/or a company.

The inspector must consider the guidance under each assigned CVIQ question and provide observations within the assigned response tools in accordance with the guidance provided. In some cases, the inspection guidance may provide specific guidance about how to manage a specific circumstance by entering a negative observation against another question in addition to the question under review.

The inspector must carefully consider a defect or substandard condition and decide whether the guidance provided by more than one assigned question would result in a negative observation from the human, process and/or hardware perspective.

The process described above is not the same as what was known as ‘double dipping’ in

the original SIRE Programme. Each SIRE 2.0 top level question addresses the safeguards or activities required to be in place to prevent the weakening or failure of a specific barrier to prevent an undesirable event.

Check that the inspector has made careful distinctions between the reporting of the initial “source” negative observation and any further negative observations recorded against other response categories under the same top-level question and against any other top-level question effected by the defect or deficiency.

A simple example which would give rise to multiple negative observations against several top-level questions would be:

An oily water separator (OWS) had been out of service for some time, but no entry had been made in the oil record book (ORB), there was no record of an open defect report, there was no company procedure to report defects and the accompanying officer was not familiar with the ORB instructions for recording the defective OWS...

Even though the question that specifically addresses the OWS and ORB are rotational questions, there is at least one core question that will be impacted by this deficiency which in itself would generate several negative observations.

13 Cross checks against other sources

The report validator is encouraged to confirm that the content of the report does not conflict with other publicly available information concerning the vessel inspected. If possible, check whether any Port State control deficiencies, classification reports or casualties have been published that should have been declared by the vessel operator through the Pre-inspection questionnaire for inclusion in the inspection report.

Member companies must notify OCIMF if they discover a report is inconsistent with other publicly available information on the vessel. The OCIMF secretariat will follow up the matter.

14 Draft report resubmission

Once an inspector has submitted a CVIQ and the OCIMF software has compiled the draft inspection report, all corrections must be managed through the resubmission process which is described in *SIRE 2.0 Inspection Management Processes – Submitting Company section - Inspection Resubmission*.

The inspection editor software tracks all inspector data input, and data input changes, from the inspection pre-board phase until the CVIQ is submitted to OCIMF.

The resubmission process tracks and documents each submitting company request for an inspector to review and correct an individual question or response and, tracks all changes that an inspector makes as a result of the request.

It is impossible for an inspector or the submitting company to correct any part of a draft inspection report without using the resubmission process.

It is also impossible to correct any aspect of an inspection report once it has been published in the OCIMF database.

Warning

If a published SIRE 2.0 inspection report is found to contain significant errors that make the report unreliable or misleading, the only option is to withdraw the report. This remains true for as long as an inspection report remains available in the SIRE 2.0 database.



Our vision

A global marine industry that causes no harm to people or the environment

**Oil Companies
International Marine Forum**
29 Queen Anne's Gate
London SW1H 9BU
United Kingdom

T +44 (0)20 7654 1200
E enquiries@ocimf.org

ocimf.org