

Novaveritas NV



HSSEQ
Technical Department

FROM: NOVAVERITAS NV HSSEQ - TECHNICAL DEPARTMENT

TO: to all NV Surveyors & Auditors and technical personnel

DATE: December 11th, 2016

SUBJECT: OIL Record Book – Incorrect entries

OBJETIVE: Promote awareness that any attempt to circumvent MARPOL requirements is totally unacceptable.

REFERENCES: HSSEQ Circular 019 - Guidance for the recording of operations in the **oil record book**

1.- The fact

Recently during a PSC Inspection onboard one of our customer's vessel, it was noted by PSC inspector that **few operations of OWS were not entered in the Oil Record Book.**

This particular OWS has an inbuilt memory which had a menu that allows recovering records from OWS. PSC inspector requires to in charge officer to go into the menu and retrieves the dates and timings of operations.

PSC inspector after he was able to retrieve the timings and upon cross checking with the actual recordings on the ORB, it was noted that few operations were not recorded.

This has very serious implications as it gives rise to unnecessary suspicions of illegal discharge.

The single most frequent port state detention items for vessels is the result of oily water separation, overboard discharge and oil record book anomalies.

2.- Novaveritas Auditor's duties

During the internal audit / Tifi inspection, auditors have the responsibility for establish compliance onboard. It is important that every effort is made to ensure that personnel onboard in well familiarized with their duties.

In the specific case for Oily Water Separator, the auditor should:

- a) Test the Oily Water Separator
- b) To check surrounding OWS areas looking for suspicious discharges
- c) Request the Engine Officer to operate the monitor to go into the menu and retrieves the dates and timings of operations.
- d) To register these electronic records for further comparison; and
- e) Review the Oil Record Book, and upon cross checking with the actual recordings on the ORB, verify if the information that auditor has retrieved, as the dates and timings of operations, be in accordance.

If this is not happening, then, Auditor should issue a Non-conformity.

3.- Zero tolerance for any non compliance to MARPOL

Novaveritas' customers and Novaveritas itself are committed to a zero approach to any non-compliance with International Convention for the Prevention of Pollution from Ships

(MARPOL). In particular, strict adherence to International Maritime Organization (IMO) requirements concerning the use of Oily Water Separators and the monitoring and discharge of oil into the sea.

Our Auditors are encourage to conduct their audits and inspection focuses in obtain evidence about compliance, good practices and familiarization onboard audited ships.

HSSEQ & Technical Department

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