



GALLAGHER
MARINE SYSTEMS

TECHNICAL SERVICES Services Scope

HIGHLIGHTS

CLICK TO JUMP TO SECTION

ISO STANDARD
17021:2015
ACCREDITED

ECP PROGRAMS

AUDITS, SURVEYS, &
INSPECTIONS

SHIP ATTENDANCES

TRAINING

PLAN PREPARATION

We are pleased to provide you with the details and scope of our Technical Services (TS) offered under our WAYPOINTS program.

Price quotes for the above services are provided upon request.

Contact us at info@gallaghermarine.com or at waypoints@gallaghermarine.com regarding any GMS questions or to further discuss, restructure, or schedule any of the below detailed inspection, audit or training services.

Yours Sincerely,

Capt. Kuldeep Singh
Sr. Vice President Technical Services
Gallagher Marine Systems LLC
Houston Office: T +1 281 491 1422 | M +1 832 605 1112
New Jersey Office: T +1 856 642 2091
ISO: 17021:2015 Accredited



ISO STANDARD 17021:2015 ACCREDITED

In June 2020, GMS TS received its accreditation certificate for ISO 17021:2015 after adopting a robust Quality Management System for bodies providing Auditing services and Certification for:

- Environmental Management Systems
- Quality Management Systems
- Safety Management Systems
- Security management Systems
- Information Management Systems

U.S. FLAG TOWING VESSEL - 46 CFR SUBCHAPTER M APPROVAL Third Party Organization (TPO)

Towing vessel owners or managing operators who select the Towing Safety Management System (TSMS) option to demonstrate compliance with 46 CFR subchapter M must complete management and vessel audits to assess compliance with their TSMS, obtain a TSMS Certificate, and complete surveys to demonstrate vessel compliance with 46 CFR subchapter M. Functions related to completing audits, issuing a TSMS certificate, and completing surveys are carried out by a TPO or an organization that can perform the work of a TPO.

For more information see [here](#).

In July 2021, GMS TS received United States Coast Guard approval as a Third-Party Organization (TPO) to conduct audits and surveys for U.S. towing vessels. GMS TS is approved to:

- Conduct audits of a Towing Safety Management System (TSMS) and the vessels which the TSMS applies to verify compliance with the applicable sections of 46 CFR Subchapter M (Sub M);
- Issue TSMS certificates to an owner or managing operator who is in compliance with 46 CFR Part 138;
- Conduct surveys of towing vessels to verify compliance with 46 CFR Sub M; and
- Issue survey reports detailing the results of surveys carried out in compliance with 46 CFR Part 137.



GMS SUPERINTENDENTS & AUDITORS

GMS has qualified and experienced personnel strategically located in the U.S. and several major ports world-wide. Most of them are ISO 14001 & 9001 certified Lead Auditors and Project Managers with extensive experience specific to several types of ship attendances, audits, inspections, and shipboard training. They are former Masters, Chief Engineers, Class Surveyors, Flag State Inspectors, U.S. Coast Guard Officers and Port State Control Officials - some of whom have worked in positions of senior management in Technical and Health, Safety, Security, Environmental, and Quality (HSSEQ) departments of major ship management companies.

We are leaders in U.S. regulatory compliance for ship owners and operators. We have overall general expertise in maritime regulations and possess deep knowledge of U.S. requirements. On a daily basis, we respond to our compliance partners located worldwide on a myriad of compliance queries and undertake U.S. trading viability studies for several ship operators and owners.

GMS regularly conducts many of the below described ship attendances including inspections, audits, and training for several shipping companies located around the globe.

During previous years, we have conducted over 500 ship attendances annually for inspections, audits, training, investigations, independent assessment, etc. In the coming years, we expect to conduct more such attendances as our WAYPOINTS service has been growing year-on-year.

U.S. DEPARTMENT OF JUSTICE (DOJ) MANDATED ENVIRONMENTAL COMPLIANCE PROGRAMS (ECP)

Since 2002, we have been regularly appointed by the DOJ to oversee about 75 court mandated ECPs for all types of ships, working as Court Appointed Monitors and Third-Party Auditors, reporting directly to the DOJ and the USCG. Such programs typically run for a duration of three years or more and require intensive shipboard audits and comprehensive gap analysis that include an in-depth scrutiny of all shipboard effluent streams, environmental protection procedures, and regulatory compliance. These programs have been conducted for large fleets of more than 120 ships.

GENERAL AUDIT/INSPECTION OVERVIEW

All audits and inspections are performed with full confidentiality and are consistent with ISO 19011:2018 - Guidelines for Auditing Quality and/or Environmental Management Systems.

A summary and detailed inspection report is provided to operators on the conclusion of the attendance. Any significant discrepancies or unsafe conditions on the vessel or in its systems noted during the inspection, even if not directly associated with the inspection being conducted, will be reported to operator immediately on discovery using the fastest communication mode available.

The benefits of our audits and inspections are:

- Independent review and audit from experienced auditors who have audited and reviewed scores of shipping companies' management systems. This effectively means that, in addition to regulatory conformance, you are also being assessed and audited against best industry practices. Internal audits conducted by in-house internal auditors tend to be restrictive and predictable with the possibility of pertinent issues going undetected or not reported.



GMS TECHNICAL SERVICES

- If required, we shall appoint a senior member of our team as a consultant who will provide full oversight of the attendance program and, if requested, conduct trend studies for common deficiencies. This added measure could provide early warning of systemic failure.
- Appointing an independent third-party company such as GMS to audit, review, and inspect demonstrates a high level of due diligence on the part of a ship owner/operator.
- Our inspections provide a level of assurance that could satisfy Level 4 of some of the TMSA 3 elements.
- During inspections, our Superintendents suggest corrective actions which are in conformance with regulatory compliance, your company's SMS, and best industry practices.
- Our inspections and audits can be used to verify internal corrective action effectiveness.
- GMS auditors perform an in-depth review and analysis of safety management systems including a forensic approach to the audit if deemed necessary. The "forensic auditing" concept has been designed to provide the highest level of scrutiny which is well above internal auditing and inspection processes. Please contact us for more information on our internally developed forensic auditing techniques.

If you choose to appoint GMS, then we strongly suggest an office or remote review of your existing management procedures and policies for our familiarization with your system. This could also be an independent office audit. We can defray travel costs by combining such an audit with one of our scheduled trips to your location.

GMS will make every effort to perform each ship attendance within the timeframes listed below with minimal crew impact in mind. The length and scope of our audits do vary and are noted below.

Our Superintendents are cognizant that audits and inspections should be conducted professionally, objectively, with discretion, causing minimal disruption to ship activities, and with full respect to the crew and their rest and duty schedules.

SPECIFIC AUDIT SCOPE OF WORK

Below is a brief overview of the respective audits and training. GMS can provide other types of auditing services upon request.

➤ **ISM/ISPS Internal Audits - ISM/ISPS/SMS Procedures**

This is a thorough review of the vessel's compliance with the ISM & ISPS Code and operator's SMS System and Ship Security Plan. It is performed at much greater depth than most external and internal audits. This audit consists of a thorough review of records/document and procedures using a checklist specially prepared from your SMS or provided by your offices. Additionally, a joint inspection of the vessel is conducted focused on safety and security procedures and policies. Subject to time availability and any ship's operational constraints, a security exercise complying with ISPS Code annual shipboard exercise can also be conducted. (See item 3. below for more information.)

Shipboard Time required to conduct the audits: 2 working days for both audits.

➤ **ISPS & MTSA Services**

GMS has a history of preparation of Ship/Vessel Security Plans (SSP/VSP) which includes ship security assessments and vulnerability studies. GMS have conducted several initial and renewal ship security assessments and audits for shipping companies.

- Time required: Various - Job Specific.



GMS TECHNICAL SERVICES

➤ **ISPS Shipboard Security & Tabletop Exercises**

GMS can design the required exercise to comply with ISPS Code Part A/13 and Part B/13. This can be done for both shipboard and office tabletop exercises. A GMS Superintendent shall board the ship or be present in the office to facilitate and proctor the exercise. A detailed report shall be furnished at the end of the exercise that would demonstrate that drill and exercise requirements as per the ISPS Code have been complied with.

- Shipboard time required to proctor the exercise: 6 hours.
- Office attendance time required for the tabletop exercise: 6 hours.

➤ **Voluntary Environmental Assessment & Conformance Audit (VEACA) / Voluntary Environmental Compliance Program (VECP)**

This is a GMS developed environmental assessment and conformance program, focusing on all aspects of environmental protection. It is based on MARPOL compliance and company specific SMS/EMS-related procedures pertaining to environmental protection. In addition, and if required by our clients, it incorporates the requirements of a typical US government-mandated Environmental Compliance Program (ECP) that exceeds MARPOL and is imposed shipping companies found guilty of MARPOL/APPS violations in US waters.

Audits include a review of your company's ISO 14001 program (if existing), records and documents such as oil record book, environmental tags/seals (if used), ballast water, biofouling and sediment control management, Vessel General Permit (VGP), SOx & NOx, sewage and garbage management. The auditor conducts operational tests of pollution prevention equipment to the extent possible. This audit is focused on reviewing, analyzing, and assessing the vessel's environmental protection procedures and policies for regulatory conformance and best industry practice and is based on our experience gained while performing U.S. Department of Justice - court mandated Environmental Compliance (ECP) programs.

- Shipboard time required to conduct the audit for typical VEACA/VECP: 1-2 working days.
- Comprehensive equipment and machinery assessment VEACA/VECP: 2 sailing days.

➤ **Comprehensive Navigational Safety & BTM Audits (Compliant with TMSA 3 Requirements)**

This audit is best performed when the vessel is actually underway to assess watch-keeping practices and procedures. Alternatively, the audit can also be performed while the vessel is alongside. The alongside audit does not have the benefit of assessing navigational safety in real time but provides a comprehensive navigation operational assessment. It includes an in-depth assessment of navigational and watch-keeping procedures, navigational, ECDIS and GMDSS documentation, status of chart correction, GMDSS practices, logbook entries, compass error book, navigational maintenance records, Master's standing orders, status of all navigational publications, status of navigational and GMDSS equipment, status of critical equipment and alarm systems, etc. Watch keeping officers are interviewed to confirm compliance. The audit is conducted to confirm that the vessel is in compliance with the Bridge Procedure Guide, the company's SMS and best management practices adopted by the industry.

The audit report comprises of a checklist and a brief descriptive summary of findings.

- Shipboard time required to conduct the audit: 1 working day. If underway, a passage is required to assess each navigation watch once. This could be as short as one day's sailing.

Voyage Data Recording - Assessment and report can be furnished on request. VDR playback and review has many advantages as an auditing tool for assessment of known near-misses or how the bridge team functions while not in audit-mode.



GMS TECHNICAL SERVICES

INSPECTIONS, AUDITS & TRAINING

Below is a brief overview of inspections and training conducted by GMS. GMS can modify/tailor these services as needed.

➤ **Pre-USCG Boarding, PSC, & US Coast Guard Certificate of Compliance (CoC) Examinations - Inspection & Training**

This attendance focuses primarily on PSC inspection regime compliance with particular emphasis on USCG expectations and requirements. A detailed review of ship's certification, documentation and record-keeping is conducted, with a thorough physical inspection of the vessel, its equipment, LSA, FFA, environmental protection measures, and statutory records, in similar fashion to a USCG PSC exam. The inspection is conducted using the USCG's PSC boarding job aids and "lessons learned" (gained from observing numerous PSC inspections over the years) as a guide. Our Superintendents pay special attention to compliance with common deficiencies and detainable deficiencies which are published each year by various PSC regimes. During the course of the inspection, several critical and other equipment is tested to ensure proper functioning. Real-time boat and fire drills are conducted for evaluation and adequacy. Ship security conformance is assessed as per the SSP and local requirements. US-specific requirements are discussed in detail and questions answered. Pre-U.S. arrival advice is sent to the ship for self-preparation.

- Shipboard time required to conduct the audit: 1 working day.

➤ **Crew Familiarization - Incident Planning & Management**

This shipboard training session entails a thorough review of the vessel response plans under OPA-90 requirements (US federal and California state), a review of protocols listed on the federal and state sections of the GMS guidance documents, familiarization with U.S. authorities, expectations and documentation, and protocol for shipboard incident response in U.S. waters. A ship training certificate shall be issued at the end of the training, and a brief training report shall be furnished to the ship operator.

- Shipboard time required to conduct the training: 6 hours.

➤ **VGP - Vessel General Permit Inspection & Training**

This attendance consists of conducting a classroom style training session with all available ship staff providing operational knowledge of 2013 VGP best management practices, documentation required, and how to handle non-conformities. The classroom training is followed by the trainer conducting a routine VGP document review, physical ship inspection, and documentation of the inspection findings. Such training fulfills training requirements as required by 2013 VGP - Routine Training. It is structured to provide training to the ship-board training officer to conduct requisite VGP training. In addition, a complete assessment of VGP documentation and a routine visual inspection are conducted. A ship training certificate shall be issued at the end of the training, and a brief training report shall be furnished to the ship operator.

- Shipboard time required to conduct the training/audit: 1 working day.

➤ **Ballast Water Management Shipboard Training**

This training is a comprehensive classroom-based training session including documents, records, ballast water record book, plan review, and a physical inspection of the system that shall satisfy mandatory training requirements as stipulated in the IMO BWM Convention, USCG BWM regulations, EPA-VGP BWM Training requirements, and California MISP BWM training requirements. It also includes training related to individual U.S.



GMS TECHNICAL SERVICES

state requirements, sediment control, and biofouling management. In addition, the GMS Superintendent conducting the training shall provide guidance on what steps to follow in the event of BWMS failure and provide information on ballast water penalties in the event of non-compliance. A training certificate shall be issued at the end of the training, and a brief training report shall be furnished to the ship operator.

- Shipboard time required to conduct the training/audit: 6 hours.

➤ **Pre-Vetting (OCIMF, CDI) Inspection - Ships & Barges**

This inspection is conducted as per OCIMF SIRE or CDI inspection requirements and protocols. The current SIRE VIQ, BIQ, or CDI checklists are used. Similar to an actual vetting inspection, our inspector provides a list of noted deficiencies which are discussed with the Master, Chief Officer and Chief Engineer. The inspector also discusses corrective action with the ship's senior staff.

- Shipboard time required to conduct the inspection: 1 working day.

➤ **TMSA-3 Services**

GMS have conducted office reviews for TMSA to benchmark and audit management systems for TMSA conformance with relevant States. We can perform similar services as independent third-party verifiers and auditors. We can also provide suggestions and guidance on TMSA-3 implementation strategies and best industry practices.

GMS also conducts TMSA-3 required ship audits:

- Comprehensive Engineering Audit
- Comprehensive Navigational Audit
- Comprehensive Cargo, Ballast, Bunker Audit
- Comprehensive Mooring Operations Audit
- Security Assessment

- Time required: Various - Job specific.



PLAN PREPARATION & MANAGEMENT

Below is a brief overview of the respective plan service offerings.

➤ **Ship Specific Biofouling Management Plan & Record Book**

GMS prepares ship specific Biofouling Management Plan and record book for the vessel conforming with the current regulations of:

- MEPC. 378(80),
- California - title 2, Cal. Code of Regulations (CCR) sections 2298.3 and 2298.4
- USCG – 33 CFR 151.2050(g)
- New Zealand - "Craft Risk management Standards" (CRMS)
- Australia - AMSA Marine Notice 11/2022

➤ **Mooring System Management & Line Management Plan (MSMP & LMP)**

GMS prepares ship specific plans to comply with Mooring Equipment Guidelines Edition 4 and OCIMF SIRE VIQ 7 recommendations. We have designed an integrated plan that includes all elements and MSMP and LMP in one document. This is a practical approach where all procedures, policies, and records are available in one file. The plans are comprehensive and practical in which we propose either our maintenance procedures for mooring lines retirement policy or adopt existing operator's SMS and PMS procedures.

➤ **Outbreak Management Plan**

The plan addresses shipboard and management policies and procedures to adopt to mitigate pandemic related risks. It is specifically designed to cover all COVID-19 aspects including prevention, symptoms, reporting guidelines, outbreak management, management of stores, waste, and medicines, comprehensive crew.

change procedure, etc. The plan is designed and written as a logical flow of possible pandemic related events and is easy to follow. Care has been taken to avoid burdening the ship staff with excessive instructions and documents. Mainly, health authority requirements and guidelines are followed. The Annexes contain many useful forms, reports, and health awareness posters.

➤ **California Marine Invasive Species Program (MISP) – Annual Vessel Reporting Form (AVRF)**

The California State Lands Commission (CSLC) requires that all vessels which arrive at a California port must submit the AVRF once annually, at least 24 hours in advance of the first arrival during each calendar year. The form requires vessel-specific information on hull husbandry practices, vessel operational profile, and ballast water treatment systems. Previously the form was completed as a PDF and e-mailed to the CSLC MISP. Beginning on 1ST January 2021, the AVRF can be submitted only via the CSLC's MISP Reporting portal. We can file this report on your behalf.

➤ **Comprehensive Passenger Ship Inspection & Audit, Environment Review, & U.S. Port Call Gap Analysis**

GMS has conducted several such inspections and have in-house expertise to conduct comprehensive passenger ship attendances that include environmental review and audit, waste stream management review, safety inspection, LSA and FFA review with emphasis on compliance with relevant SOLAS Ch II/Ch III, and MARPOL Annex I, IV, V, and VI requirements. We also review passenger ships for suitability and preparedness for U.S. port calls with regards to USCG expectations, U.S. centric requirements, crew training and preparedness, large cruise ship VGP requirements, effluent analysis and management, individual U.S. state cruise ship requirements for Alaska and Hawaii, etc.

- Shipboard time required to conduct the inspection: 3 working days.



OTHER SERVICES & SHIP ATTENDANCES

GMS TS also provides a wide range of other ship attendances and services which are listed below:

- U.S. port call compliance Gap Assessment inspection, review, and remediation both for ship and management
- Expert first responder in the event of a vessel incident or casualty
- Full range of Port Captain Services
- Technical Superintendent Services
- Assistance with cargo operations (Dry, Containerized, Liquid, Chemical, and Gas)
- Assistance with cargo planning - emphasis on special cargoes
- Pre-purchase and pre-hire vetting and inspections
- Condition assessment inspections.
- Cargo survey and loss control
- Attendances during ship repair
- Forensic Environmental Conformance Audits
- Independent incident investigation and confidential in-depth reports with RCA
- Provide reports on local and port conditions for client's risk assessment purposes.
- Liaison with local authorities
- Provide local advisories when required.
- Owner interest representation in other shipping matters

These audits, inspections and training can be conducted concurrently, time and vessel schedules permitting, either on a per diem or lump sum basis to fulfill the most comprehensive shipboard auditing and training needs of the vessel. We can also structure a combination of the audits and training mentioned above, to specifically suit your needs.

END OF DOCUMENT

