



To: OCIMF; Mr. Rob Drysdale and Mr. Sam Megwa
CC: Mr. Matthew Graham

Rotterdam, February 18, 2021

Dear Mr. Drysdale, dear Mr. Megwa,

Referring to our previous letter, dated 18th of August, 2020 and recent developments, we hereby would like to draw your attention regarding the following concerns:

The SIRE inspection scheme for barges is now live since 1-1-2021 and after 6 weeks some misalignments are becoming apparent. The below listed misalignments are causing concerns to the inland tanker barging industry represented by EBU, ESO & PZI (for safety), which will have negative effects for operators, their barges, inspectors, recipient members and third party vetting companies in the upcoming months.

Misalignments:

- There is a clear lack of accredited inspectors with a token from the submitting members that can perform an inspection. Result is that inspectors are not being used in an efficient way or that inspections cannot be carried out.
- There are some inspection requests not honoured by the submitting members (new Build, not used by the submitting members, lack of interest by the submitting members);
- In reality of the 105 million Metric ton of product that is yearly transported on the West-European waterways 25 million Metric ton are chemicals. This would mean that approx. 25% of all inspections, are done on barges that predominately carry chemicals;
- The companies using chemical barges (That also transport dangerous chemical goods to and from oil refineries) such as Covestro, Evonik, Alsa Chemie , etc. and who are as far as we know not an OCIMF (Recipient or Submitting) member have no access to order or receive any inspection reports. This could lead to the fact that, either inspection reports are being shared by operators or that those companies are forced to start an extra inspection regime. Both of these options would not be beneficial for all parties concerned. In the end this might lead to more unsafe situations and higher costs, as there would be different inspection standards to deal with;
- Some submitting members have made it clear that the amount of submitting inspections on their behalf are not to exceed the amount of inspections allocated by EBIS in 2020. As there are only 13 submitting members that use barges in OCIMF in comparison to 43 submitting members in EBIS, this will result in a shortage of inspection submissions in the second half of 2021.
- A lack of clarity of the process followed by the operators with regards to the fact that when an inspection is published by the operator, the submitting member still cannot release or revoke the inspection. Therefore leaving the barge unable to use for most of the stakeholders;



- The first recipient member is ordering an adapted BIQ 9.0 inspection straight from the inspection company in order to keep the barges they will use inspected, and therefore making themselves independent from the grace of the submitting members;
- There is a need for non-OCIMF members to get the barges they use, inspected at a defined minimum standard. The first non-OCIMF member has already contacted an inspection firm, to get the barges they use inspected. Several of these inspections have already taken place. After prompting by an operator the non-OCIMF member has requested an OCIMF membership. The requestor has been informed that they could become a recipient member and therefore cannot submit inspections. This company has abandoned the request for membership of OCIMF and will continue to arrange for their own inspections. Some recipient members make use of third party vetting companies, who screen barges on a daily base. Since OCIMF does not provide this service, the recipient OCIMF members are looking for other inspection/vetting schemes. These recipient OCIMF members also made their concerns clear to the OCIMF taskforce but have not received any reaction so far.
- As OCIMF members are often involved in transport chains that are organised by non-OCIMF members, it is in the interest of all parties in the transport chain, to reach an agreement between OCIMF members and non-OCIMF members in this matter.
- The tank barging market is volatile and the available capacity also highly depends on water levels. It is therefore in the interest of both shipowners and the industry to have a sufficiently large fleet of inspected ships at their disposal in order to fulfil the transport needs at all times.

Despite the good start of the barge inspection regime in SIRE it seems that the process of launching the EBIS equivalent in SIRE is starting to prove somewhat more difficult than initially anticipated.

As a barge industry we are committed to a working inspection scheme by OCIMF-SIRE but some work is still has to be done before (in our opinion) the scheme will come to a grinding standstill.

Suggestions:

- Increase the number of OCIMF members that can and are willing to submit inspections;
- Make a bigger effort to get commitment from chemical companies to join OCIMF, by making it more attractive to join OCIMF for their inspection;
- Draft a set of guidelines for the submitting and recipient members on how the process works;
- OCIMF could communicate to their members on the expectations regarding the maximum cost of an inspection and the dividing of the number of inspection in relation to the amount of barges used over a calendar year (like EBIS used to do).



Prognoses:

If we do not take action now, we run the risk that we will set the clock back at least 25 years and there will be several inspection formats:

- OCIMF SIRE BIQ 9.0 inspections;
- CDI barge inspections;
- Inspections done by several oil and chemical companies to exercise their due diligence in mitigating the risks of transporting their product throughout Europe.

Way forward:

The present Taskforce performed a very good job and we hope that they can complete the finetuning of the present system in cooperation with MIS-Marine. But we can also see that some processes need to be improved and/or changed. We therefore ask you kindly to contact our industry representatives (EBU/ESO/PZI) so we can discuss what can be done to move forward and jointly tackle these issues and solve this (rather urgent) situation.

We thank you in advance for keeping us informed about the process.

With kind regards,

Theresia Hacksteiner
Secretary General EBU

Gerard Kester
Secretary General ESO