



Management Review

2019

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Brett McElligott, HSEQ Manager  
Grindrod Shipping

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# Date of Review

Date: 19 June 2020

The Management Review was chaired by General Manager and attended by following members.

Quentin Foyle

Hilton Stroebe

Rajaraman Krishnamoorthy

Denver Mariano

Rodney Holmes

Henry Dayo

Richard Navo

James Requilme

Brett McElligott

Brendon George

Mike Allen

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## Review of previous Management Review (2018)

Report of previous Management Review (2018) was reviewed and found satisfactory. No outstanding issues were noted.

## Review of the Action Plan for year 2019

Refer to attached sheet for action plan

S.NO	Item	PIC	Target date	Status
1	2020 Fuel oil compliance / SIP		Dec 2019	complete
2	Incorporating training and drills in BASSNet	Subu	Mar 2019	complete
3	Incorporating certificate module in BASSNet	Subu		Not Complete
4	Changeover of ECDIS from Furuno to E- Globe on IVS PHINDA	Raja / James / Joey	May 2019	complete
5	Revise SEEMP PART 1	Brett/ Tang	July 2019	complete
6	Submit EU MRV emission report to Thetis EU and obtain Document of compliance for vessels that called EU port in 2018	Tang / Brett	Apr 2019	complete
7	Collect Fuel oil consumption data for year 2019 and submit to class	Tang / Brett	DEC 2019	complete
8	Installation of ballast water treatment systems as per IMO / USCG requirements	Rod Holmes		Ongoing
9	Prepare Inventory of Hazardous materials to comply with EU requirements	James Requilme	3Q 2019	Commenced

# Vision and Mission Statement

## **VISION STATEMENT**

To continue to be a significant and profitable international ship-owner and operator with a growing fleet of modern and flexible ships.

## **MISSION STATEMENT**

*To provide high quality shipping services across the sectors in which the division participates and be the carrier and partner of choice for Blue Chip customers.*

# Safety & Environmental Protection Policy and Objectives

*Grindrod Shipping PTE. Ltd is a leading global provider of shipping operations. It is recognised that our services, lead to an improved quality of life.*

*It is Grindrod Shipping's policy to:*

- *Care for its people and provide safe and healthy working conditions;*
- *Protect and conserve the environment in which we operate;*
- *Maintain the highest standard of integrity; and*
- *Provide our customers with services that most closely meet their requirements and expectations.*

# Senior Management Message to the Fleet

Good Day

As part of the Company Management system, an annual review is conducted to verify that the structure and policies and forward vision are relevant, market related and pertinent going forward.

Over the last 12 months, I believe we have performed well, given the challenges the industry is grappling with:

- The tanker market has had another year of poor earnings despite a short upswing in December. This is forecast to continue over the next 12 months.
- The bulk market was making slow but steady improvements in the late 2019, but was impacted by the early Chinese New Year, and then plunged straight into the Covid 19 economy downturn crisis.
- In the Tanker market we saw the sale of UMGENI, KOWIE, INYALA, and soon RHINO.
- In Dry we saw the sale of IVS KAWANA, driven by her age.
- The world was plunged into the worst economic catastrophe, starting early in January, caused by the Covid 19 pandemic.

On a positive note:

- We took delivery of IVS OKUDUKO and IVS PRESTWICK, who are performing well
- We managed the 2020 fuel change over very well, minimising the company's exposure to unusable inventories
- We were able to streamline our crewing operations and trim overhead costs, despite our Manila office still in the registration phase. These delays are beyond our control due to Covid 19 constraints.
- We have reviewed our procurement procedures and have introduced new software and better control functions that will result in savings.

We were able to identify the dangers of the Covid 19 impact well ahead of the market reaction, which allowed us to prepare our system for working from home, and take measures aboard to ensure the sterile environment of the accommodation block. As our measures were ahead of the market, we took a lot of criticism, some even accusing us over "over reaction".

Our early measures are now the "new normal" and accepted.

We will face unprecedented challenges going ahead as we live with the virus. Management is eagerly reviewing all new information as it becomes available, to ensure our fleet is protected, operational and economically efficient as we plan forward.

Crew safety and welfare is of paramount importance, and we will have to be particularly careful during crew port calls, dry docking and crew change.

The biggest change we see from the pandemic is the way that we conduct our management going forward. These changes are quantum, and can be compared to management before the personal computer, and after it was introduced.

All management tools will have to be 100% portable and video conferencing will become an indispensable tool, as the desk phone and office work desk becomes obsolete.

Office management personnel will also need to redefine their job descriptions and reskill to understand how to work effectively without being micro managed in a clock watching environment.

Results will have to be output based rather than time attendance based. This is the time each person has the chance to relook at what they can put on the table to make our changes really effective and to ensure we can manage ships better than any other ship management company.

Big Ship Managers will take time to adapt, simply because of their size and the culture changes required.

The depth of our collective knowledge, culture and understand allow us to really look hard at what is happening across different industries, and use best practice and software to build a dynamic management team, that is technically sound and economically effective.

This disruptive management has to be conducted, while our fleet remains is fully operational.

The next year will be one of dynamic change and improvement on a scale I have not seen in my working career.

I, as I am sure you, look forward to the challenge.

Captain *Hilton Stroebel*

Marine Manager Grindrod Shipping Pte. Ltd.

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# Review of Vessel Feedback to Safety Management System and updating of the SMS.

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## Company circulars review

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All Company circulars issued in 2019 were reviewed and incorporated in our SMS system if the SMS required updating. A few circulars are reissued with new 2020 circular number and uploaded in SHEQ system.

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## Masters system review

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All Masters system reviews received from vessels were analyzed by the Office and necessary corrective action taken as required. The HSQE manuals were amended on occasion.

Please see Appendix A for details of the Master's Review.

HSQE manuals were also reviewed for continual improvement depending on feedback from ships, classification society, administration, oil majors, PSC inspections, non conformities, changing regulations, best practices etc. Refer to company circular on Masters system review.

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# Internal and External Audits / Inspections

## Audits Internal and External

Internal audits of ships and company were carried out at planned intervals for improvement of the HSQE system. Corrective and preventive actions were taken for all observations / NC raised.

All Non-Compliances and observations raised in external audits were reviewed and necessary Corrective and preventive actions were taken to prevent recurrence.

The following **external** audits were completed onboard the Vessels and Grindrod Ship Management Office during 2019:

External Audit Type	No. Of Audits	No. of NCR	No. Observations
ISM + ISPS	8	0	0
MLC	1	0	0
ISO9001	-	-	-
ISO14001	-	-	-
DOC (MPA+MI)	1	0	0

The following **internal** audits were completed onboard the vessels during 2019:

Internal Audit Type	No. Of Audits	No. of NCR	No. Observations
ISPS + ISM	30	61	254
Navigation	43	14	88

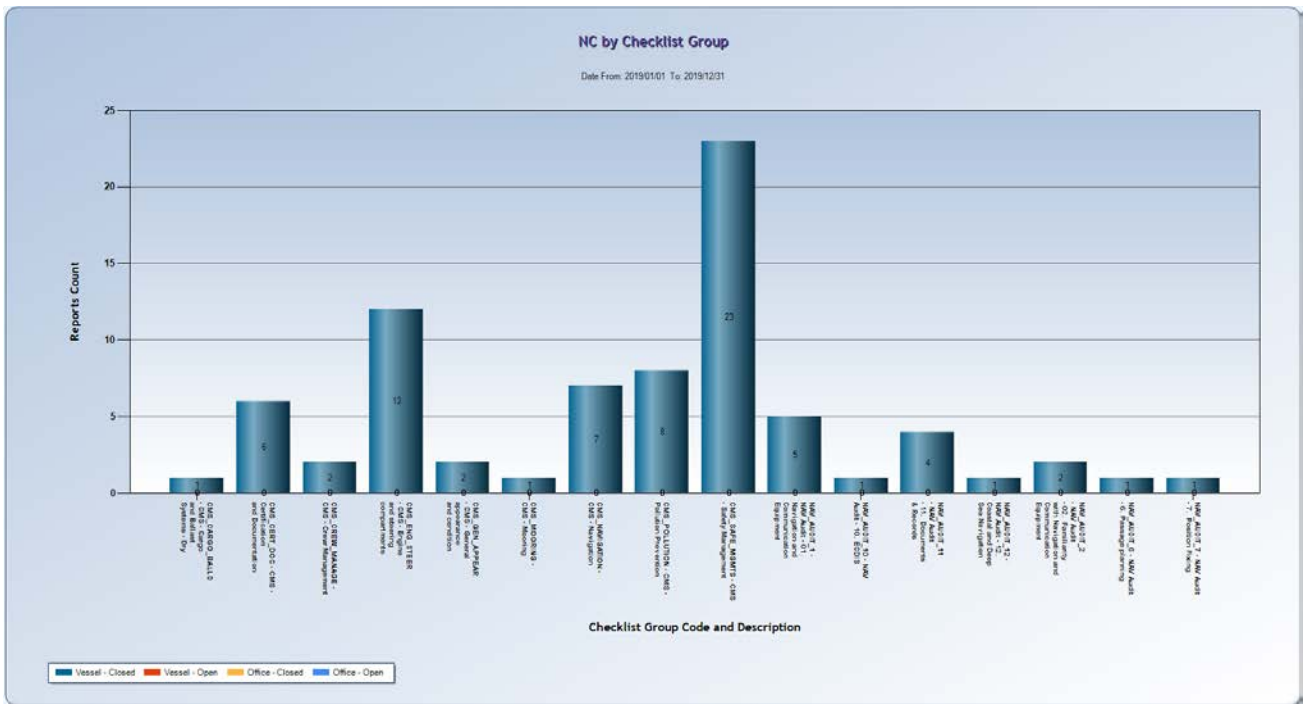
## Analysis of Internal Audits

The following analysis of the audits was completed. Please note that for analysis purposes, the audit findings are usually entered in BASSNet.

The Masters are not as efficient as they should be with appropriate and valid closeout of observations and NCN's. On occasion the Masters do not reply to the remarks, these then become overdue. The Ship Manager is to actively ensure that the vessel closes out all NCN's and observations appropriately.

Of concern in the analysis is the limited knowledge and use of the ECDIS equipment and software. This has been clearly identified during audits. The Office has taken appropriate action by having senior masters attend the vessel whilst sailing. An extensive navigation audit has been completed and associated mentoring completed thereafter. Other issues include permit to work forms not filled in or incorrectly filled in. Documentation in general needs to be reviewed and the SMT are to ensure the accuracy thereof. This is a repeat of what happened in 2018.

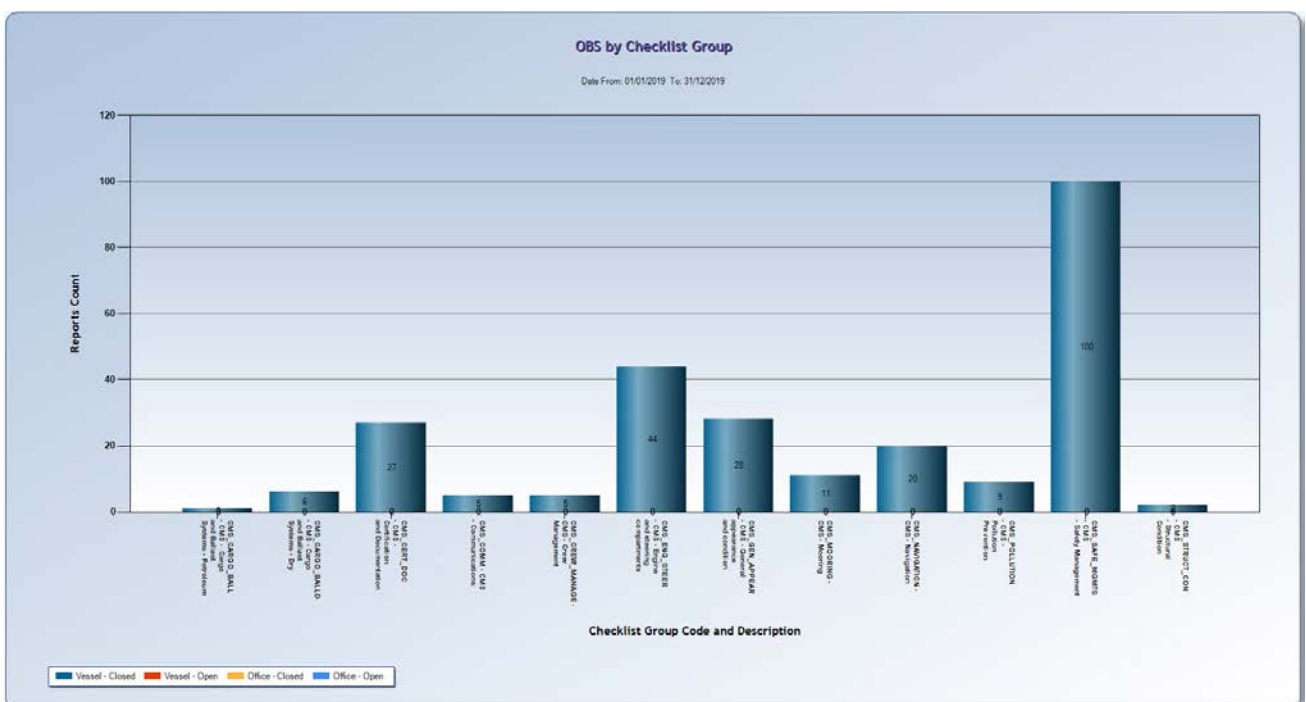
**Internal ISM Audits:**



An analysis of the **Internal Non-Conformances** identified the following areas of improvement for 2019:

1. Documentation Are all the Company policies, procedures onboard and up to date. (3 NcNs).
2. Documentation: Are ships network and PC's set up as per Company Policy? (3 NcNs)
3. Engine: Is a planned maintenance system being followed and is it up to date? (3 NcNs).
4. Safety Management: Enclosed space and hot wok permits not correctly filled in (3 NcNs).

However, it should be noted that 30% of all NcN's are Safety Management related. It is for the CNO as safety officer to monitor and audit to ensure that safety systems are being maintained.



An analysis of the **Internal Observations** identified the following areas of improvement for 2019:

1. Safety Management: Are the locations of life saving appliances marked with IMO symbols?? (7 Obs)
2. Safety Management: Have Material Data Safety Sheets been provided for the bunkers currently on board?? (7 Obs)
3. Documentation Management: Is the Official Logbook being filled in correctly?? (6 Obs)
4. Documentation Management: All publications contained as be Standard Library. (5 Obs)
5. Engineering: Is a planned maintenance system being followed and is it up to date?? (5 Obs)
6. Safety Management: Are chemicals properly stowed and are Material Safety Data Sheets available? (5 Obs)

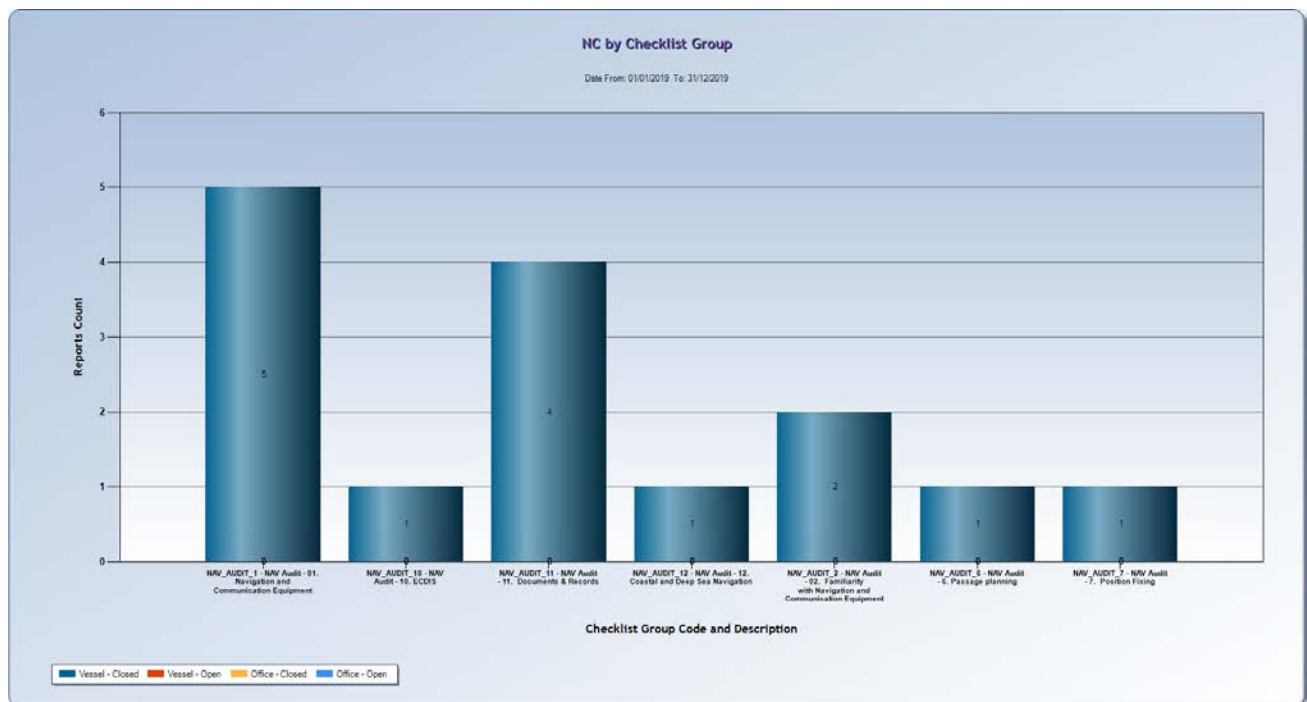
**Corrective Action Plan for Internal Audits:**

An analysis of the **Internal Observations** identified the following areas of improvement for 2019:

The above observations are all new – not previously recorded multiple times in previous years. The visiting Ship Managers are to ensure that the Material Data Safety Sheets onboard reflect what is onboard and are less than 5 years old.

Marine Superintendents and the SHEQ department representatives who will contribute to additional shipboard audits and training on board during their ship visits in 2020 to ensure that the Ship Maintenance plans are being adhered to.

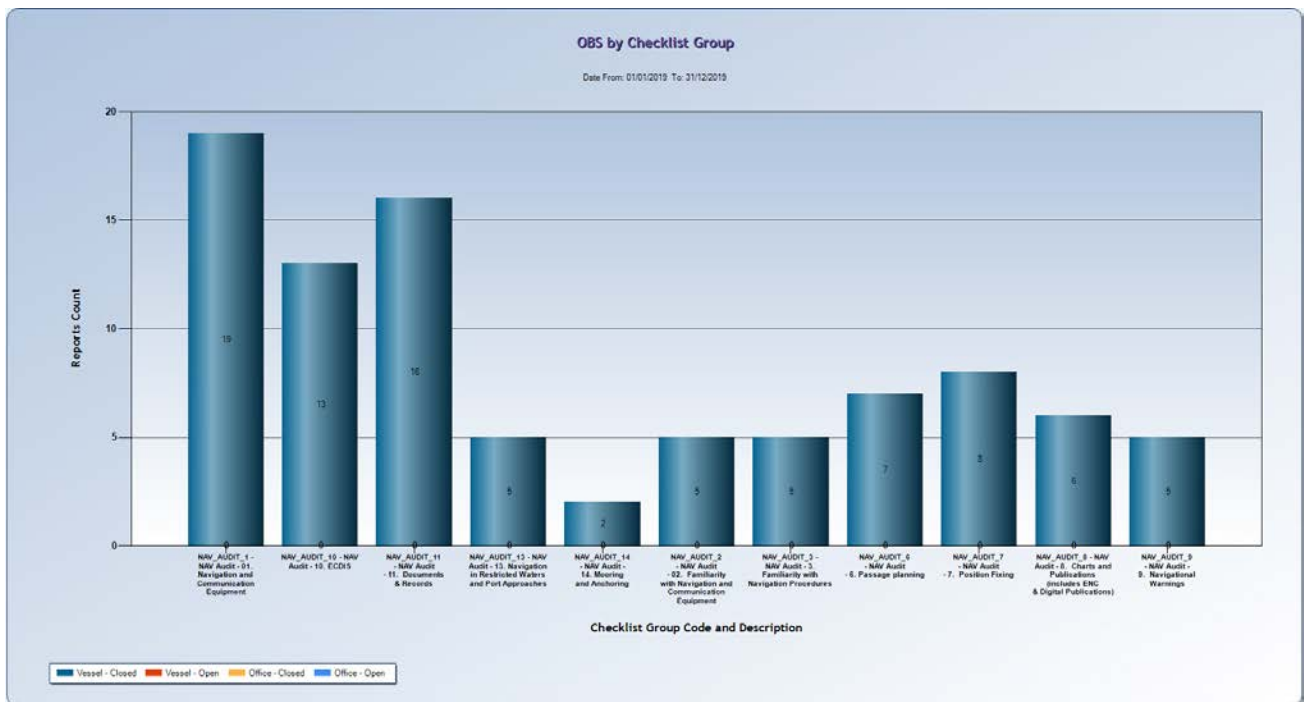
**Internal Navigation Audits:**



An analysis of the **Internal Non-Compliances** identified the following areas of improvement required for 2020:

It is noted that all the Non-Compliances are 1 NcN each. Therefore, the HIGH RISK non compliances are as follows:

1. Equipment: It appears that five pieces of Navigational equipment were defective during the audits (5 NcN's)
2. ECDIS safety parameters settings (Safety Depth, Safety Contour, Shallow Contour, Deep Contour, "Look Ahead") are in compliance with Company requirements for different stages of the voyage. ECDIS Passage Planning Checklist B is properly completed and all Officers are acquainted with alarm settings. (1 NcN)
3. ECDIS: Check officers' familiarity with ECDIS using ECDIS Familiarization checklist Nav-B4. (1 NcN)



An analysis of the **Internal Observations** identified the following areas of improvement required for 2020:

1. Equipment: It appears that a further eight pieces of Navigational equipment had issues necessitating observation remarks during the audits (8 Obs)
2. Position Fixing: Over reliance of GPS Fixing on ECDIS. (3 Obs); LOP's also to be taken
3. ECDIS: ECDIS safety parameters settings (Safety Depth, Safety Contour, Shallow Contour, Deep Contour, "Look Ahead") are in compliance with Company requirements for different stages of the voyage. ECDIS Passage Planning Checklist B is properly completed and all Officers are acquainted with alarm settings. (2 Obs)
4. Documentation: File for NAVAREA warnings not adequately kept. - (3 Obs)

**Corrective Action Plan for Internal Audits:**

The above are being addressed by induction of additional guidance via Circulars and training material. Marine Superintendents and the SHEQ department representatives who will contribute to additional shipboard audits and training on board during their ship visits in 2020.

## **Technical Inspections review**

Ship visits were carried out on all vessels by SHIP MANAGERS at planned intervals to ensure compliance and improvement of HSQE system. All observations raised during visits were closed and reports filed in company – BASSNet.

## **Periodic review of Internal Audits for compliance with the ISM Code**

Company has verified all those undertaking delegated ISM-related tasks are acting in conformance with the Company's responsibilities. Verification was done through review of internal audits, technical inspections, Navigation audits, Reviews by the Office on Colligo, incident and near miss analysis, deficiencies from PSC inspections, external audit non-conformance etc.

It was observed that each individual effectively implements and acts in conformance with company's SHEQ Management System. Each individual ensures that they are familiar with their responsibilities, authority and interrelationships.

## **Analysis of Incidents and Near misses**

### **Incidents**

There were 145 incidents for the Grindrod Fleet in 2019 (87 in 2015; 110 in 2016; 104 in 2017, 187 in 2018), this covers both the IVS and Unicorn Fleets. As lessons learned are distributed to both fleets and usually common to both fleets, the analysis does include both fleets where relevant.

The following incidents below are a summary of the most severe incidents for 2019 for the IVS Fleet. As can be seen below the amount of LTI's and MTC's is certainly a cause of concern. Where trends have been identified (e.g. burns), Circulars have been published with remedial action. However as can be seen from below most of the injuries could have been avoided just by situational awareness alone!

### **Spills:**

#### **Malicious allegation:**

##### **IVS KINGBIRD**

It was reported to the Office by a crew member, through "Grindrod Shipping – Concern" email address, that bilges were pumped out through the sewage treatment plant instead of through the oily water separator in December 2018. As per management advice, one of our Ship managers boarded the vessel at the next port to interview the officers.

He conducted a detailed investigation, obtaining statement of facts from relevant officers, verified records such as the oil record book, the seal register plus carried out a physical inspection of engine room and relevant equipment.

At the same time a Ship Manager whilst in Manila interviewed the previous 2EO who had signed off from vessel. It was alleged that this infringement had occurred on his watch.

Both Ship Managers reported they could find no support evidence to this allegation, plus found the persons interviewed to be fully credible.

It is established that the false allegation was raised by a crew member who had some work-related disputes with the head of his department.

## **Losses:**

### **IVS MERLION May**

A hydraulic hatch ram on number 3 hatch locked, causing damage to the casing of the ram and buckling the deck frames underneath. Repairs were completed in Dry-dock.

### **IVS NORTH BRWICK May**

The luffing wire of no.4 Crane snapped, causing a fully laden grab to fall back into the cargo pile of no.5 hold. An independent investigation concluded fatigue of the wire over the sheaves caused the failure. Remedial action has been completed.

### **Additional Noteworthy Event:**

### **IVS KINGLET February**

Cargo hold surveyor from Intertek company took samples of cargo from the holds through cargo hold main deck ladders. After taking samples in cargo hold no. 5, whilst descending on the portside main deck ladder, he felt a striking pain on his right knee lost his balance and fell down a height of about 0.5 meters. Apparently, this was a reoccurring injury.

### **IVS KINGLET August**

3NO was on duty on deck and vessel was discharging cargo at Port of Algiers. One of the stevedores approached her, put his hand under her coverall and when 3NO leaned back to avoid contact, he grabbed her breast and squeezed. This event was reported to P&I and ITF.

## **LTI's and MTC's:**

### **IVS SPARROWHAWK January (MTC)**

During portable gangway securing on departure Port Canaveral, USA, a crew member lifted the gangway incorrectly and strained his back in the process.

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**IVS KESTREL April (MTC):**

A crew member was reconditioning ship's cargo hook inside the engine room workshop. He tried to flip the hook but due to the weight of the hook his ring finger was caught between the hook and the workshop table, squashing and cutting the finger. The injured crew member attended the doctor and found fit for duty.

**IVS HIRONO July (LTI)**

The 2EO and his assistant were working on the De-aerating tank sensor. When they took out the sensor, they were scalded by the jacket water due to the tank being slightly pressurized. Due to the high temperature of the water, the 2EO suffered burns. The wiper suffered only slight redness. First aid was applied to 2EO and he was sent to hospital for further treatment.

**IVS ORCHARD July (LTI)**

The crew were cleaning cargo hold no.5 in Jebel Ali where the vessel was berthed. The crew had been cleaning that hold for 2 days prior. When the crew stopped for lunch the crew member was complaining that he had muscle cramps and spasms. He could not move because of the spasms in leg hand and side. The Doctors sent an initial report that the crew member had heatstroke and he was admitted to hospital for two days.

**IVS KESTREL July (LTI)**

The 2EO noticed the level gauge was not moving after filling Waste oil tank no.1 in Engine Room. As he was investigating the cause, he opened the top cover of the tank where the gauge wire was leading but hot oil splashed causing burns on his body.

**IVS SWINLEY FOREST: September (LTI)**

Crew members were trying to pick up the slack on the wire drum of the stbd accommodation ladder by turning the drum using the manual handle. During this process the wire continued to slacken off so the crew decided to use the electric motor to take in the slack wire. The electric motor started however the manual handle had not been removed. The handle rotated and hit the crew member on the left leg, fracturing the leg. The crew member was sent to hospital for examination then repatriated.

**IVS KESTREL September (MTC)**

Deck crew members were working in forecastle uncoiling and coiling the hoisting wire onto the cradle when a crew member was hit in the mouth by the wire, he suffered one broken tooth and a minor bruise on his lips.

**IVS KINGBIRD: October (LTI)**



Two officers were overhauling a valve which was fixed to the working bench vice. A crew member was working nearby the two officers.

The officers were using the box striking spanner to loosen the valve bonnet. When striking the spanner with the hammer, the hammer slipped and hit the crew member’s right eyebrow, causing a deep cut.

**IVS KINGBIRD: November (LTI)**

The seafarer was walking upstairs to the bridge. He slipped on the stairs and snapped his Achilles tendon. He was repatriated in the next port.

**IVS RAFFLES: November (LTI)**

The seafarer was replacing a hydraulic ram for the hatch. He strained his back muscles completing this process. Required a day off to rest his back.

**IVS TRIVIEW: November (MTC)**

The seafarer was welding pipes. However, during the process, he got arc-eye due to not shielding his eyes when commencing the welding process.

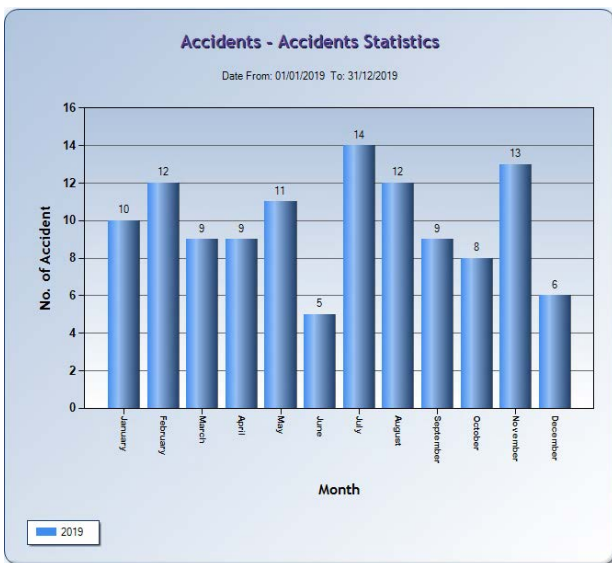
**IVS SENTOSA: November (MTC)**

The seafarer was carrying heavy equipment. He inadvertently squashed his finger when putting the equipment down, causing bruising and a split on the finger.

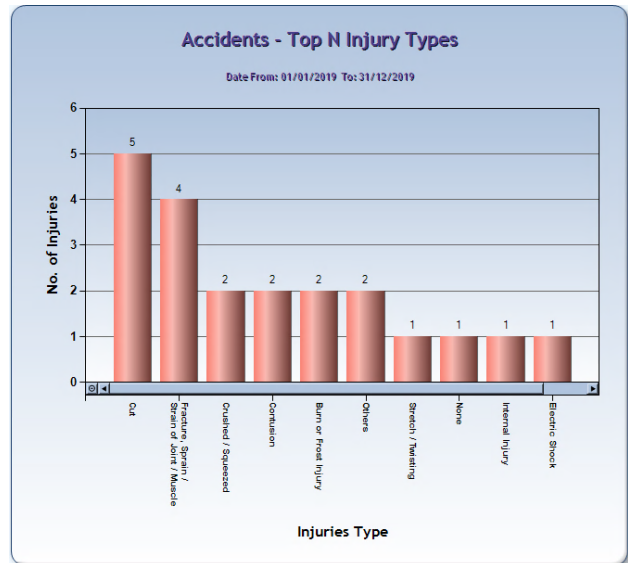
**IVS SPARROWHAWK: December (LTI)**

The crew were replacing the port side windlass brake lining. The crew member was hammering a frozen lower brake lining hinge pin; however, he inadvertently struck his middle finger resulting in a contusion to his left middle finger.

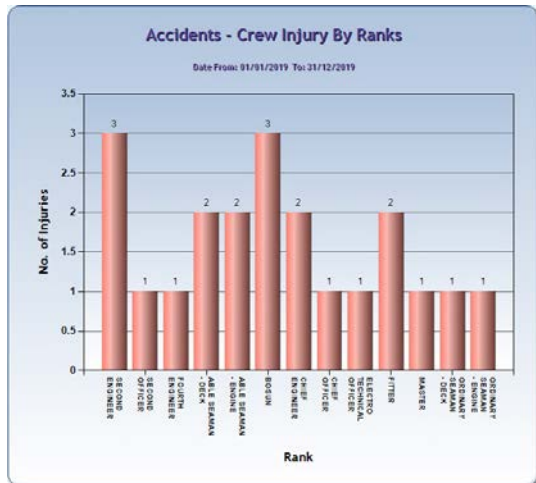
The following Accidents occurred in the IVS Fleet during 2019:



Grindrod: Incidents by month

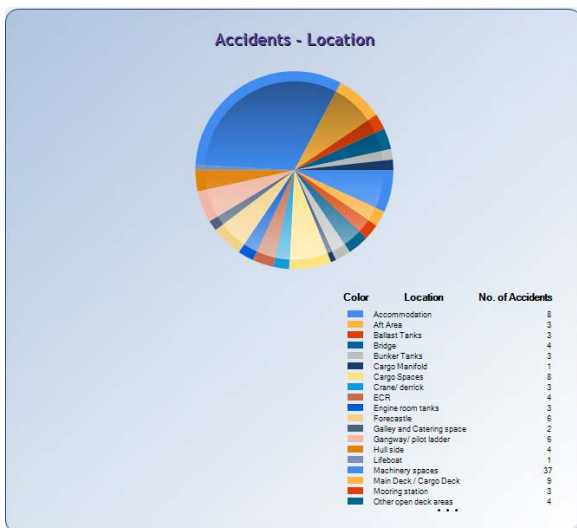


Incidents by Injury type



Incidents – Crew injuries by Ranks

As can be seen in this analysis the Second Engineer and the Bosun were most likely to be injured. Certainly the Second Engineer’s injuries included some serious burns.

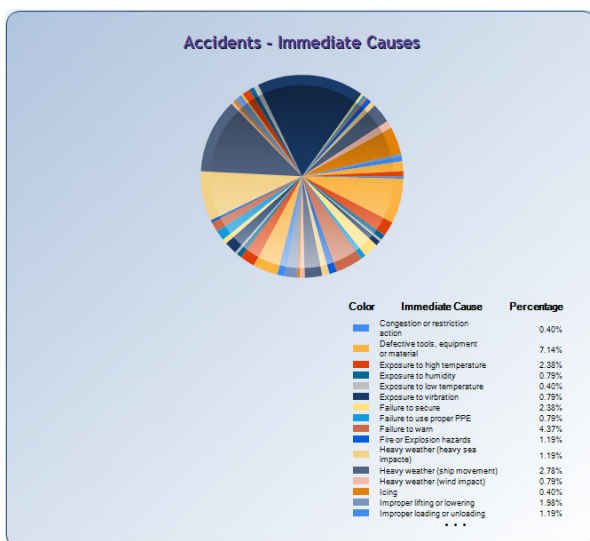


Incidents – Location

The top three **Location** of Incidents include:

- 31.9% Engine Room
- 7.7% Cargo Deck
- 6.9% Accommodation

In summary - 32% of incidents occurred in the Engine Room spaces, this is up from 26% in 2018.

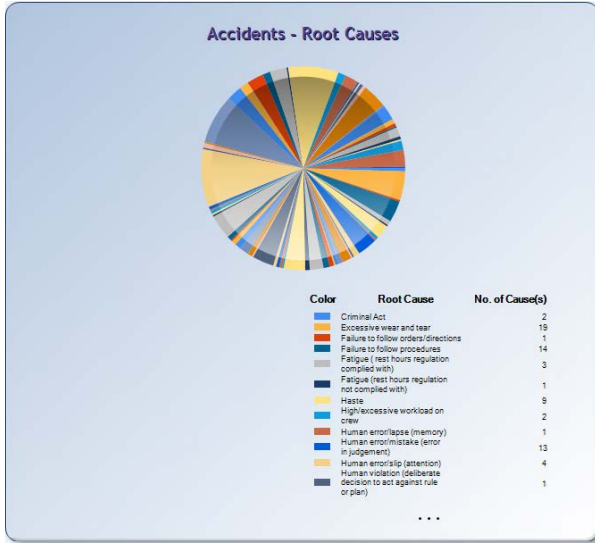


Incidents – Immediate Causes

The top three **Immediate causes** of Incidents include:

- 17.1% Procedural Error
- 11.9% Machinery Malfunction
- 7.9% Machinery Breakdown
- 7.1% Malfunction tools or equipment

In summary - 17% Immediate causes of incidents are directly attributable to human error and lax practices on the crew’s behalf. In 2015 it was 24%. This result is a little less than 2018.



Incidents – Root Causes

The top four **Root causes** of Incidents include:

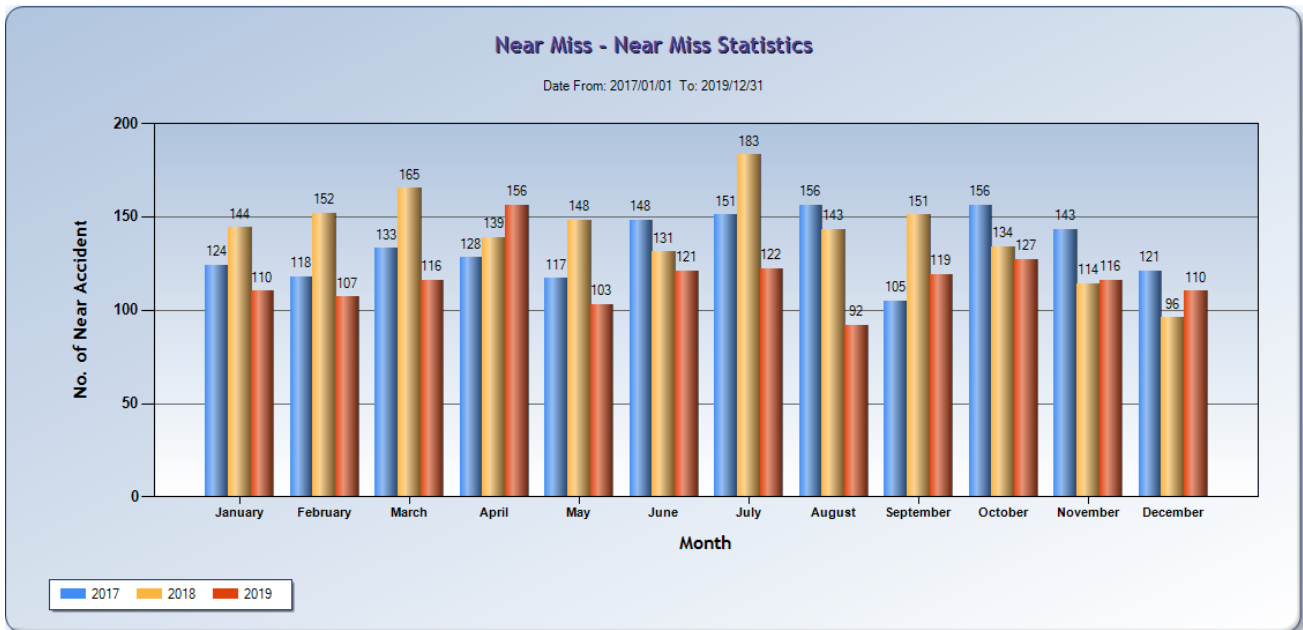
- 9.2% Error in Judgement
- 7.99% Lack of situational awareness
- 7.75% Lack of attention
- 4.6% Excessive wear and tear

In summary – 24.9% Root causes of incidents is directly attributable to human error which may have its origins haste and not assessing the complete picture prior to commencement of the job. Hence the need for the Senior Management team onboard to oversee the jobs being performed onboard and enforce that “speed can kill”.

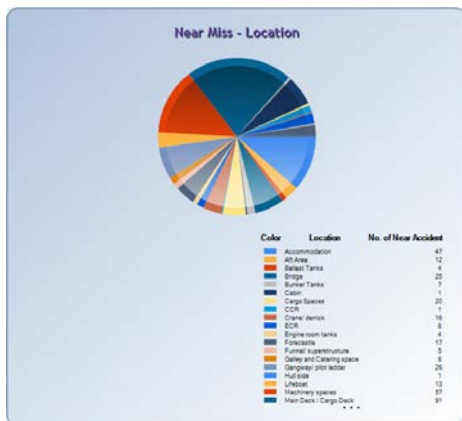
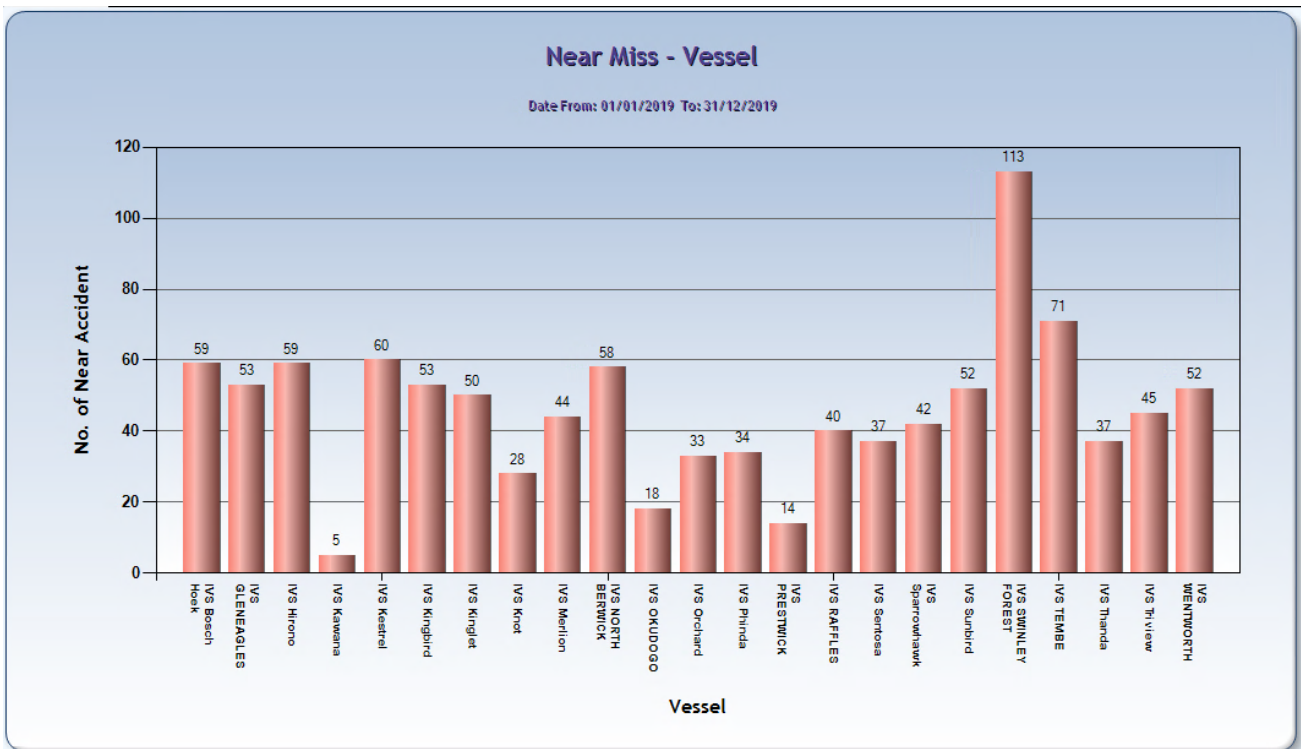
## Near Miss

A total of 1399 near misses were raised during 2019 for both fleets. This is a 17% decrease in the number of near misses raised in 2018 (1700 near misses). Further education in the use of the “Fast track wizard” in BASSNet for the ease of reporting has not led to increased reporting of near misses. Near misses are being reported from the IVS Fleet, these account for 75% of the total near misses reported in 2019. It should be noted that 3 of the fleet of 7 Unicorn vessels were sold in 2019 hence the reduction of near misses.

Where applicable the “Lessons learned” in BASSNet are being distributed to both fleets. These are then being read out during the Safety Management Committee meetings held onboard.

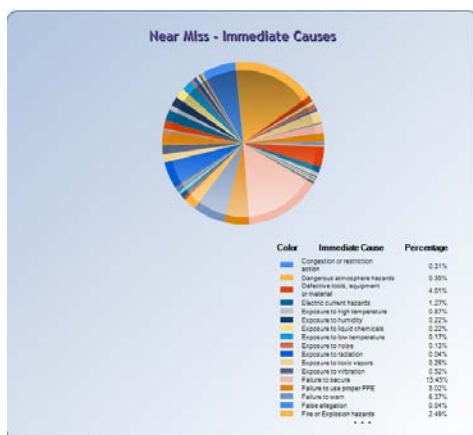


Unfortunately, not all vessels report as diligently regarding near misses. Typically, the Office expects around five near misses per month. Some vessels are much lower than that. Vessel senior management are to ensure that the crew remember “Safety First” and report all near misses.



The top four **locations** of Near Misses include:

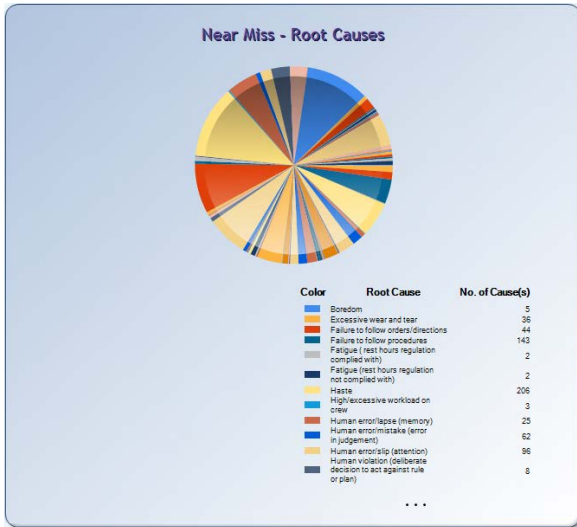
- 22% Main Deck
- 13.7% Machinery spaces
- 11.3% Accommodation
- 6.3% Gangway



The top four **Immediate causes** of Near Misses include:

- 16.7% Procedural error
- 15.5% Failure to secure
- 6.4% Failure to warn
- 6.7% Poor housekeeping

In summary – 37% Intermediate causes of incidents are directly attributable to human error which may have its origins in lack of thorough and proper training. This is the same as the previous 2 years



**Near Miss – Root Causes**

The top six **Root causes** of Near Misses include:

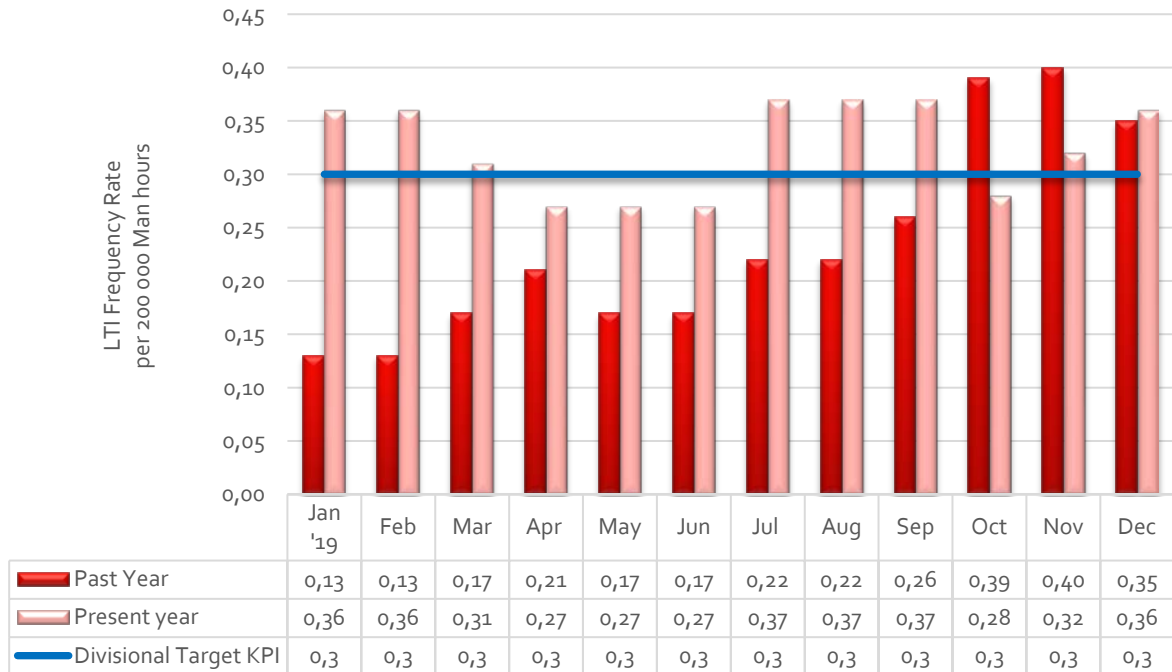
- 11.9% Lack attention
- 10.4% Lack of situational awareness
- 8.1% Incorrect judgment
- 6.6% Inadequate supervision
- 5.7% Haste

These are all put down to human error. Reinforcement and Monitoring of procedures by the SMT onboard is essential for the reduction in human error through proper policing and education of the crew onboard.

# Safety Performance

## LTIFR

### IVS Shipping



KPI	Comment by exception
<b>Fatality</b>	-
<b>LTIFR</b>	The Division has decreased the LTIFR target rate by 14.5% to 0.30 per 200 000 man-hours (rolling average) Remains below target and under control. Education measures regarding working with mechanical tools being completed onboard.

Safety incidents and injuries have been reported by e-mail to the Ship manager and crewing department. However, on occasion the same has not been reported into BASSNet. The Ship Managers are to ensure that all incidents and near misses which are reported in e-mails, Safety Committee minutes or other reports are also reported in BASSNet.

The IVS Fleet are now recording incidents and injuries far more accurately over 2019. This has been backed up by the Office reviewing the Medical reports of crew received for payment by the Office. The IVS Fleet have made good strides with regard to the reporting of injuries during work. The Masters are encouraged to keep on the good work and not only to have a safe vessel but when injuries occur, to report them so that the rest of the fleet can learn from these injuries.

As seen above the LTI's have had an increase due to 3 incidents in July and 2 incidents in November. This has pushed the LTI Frequency Graph above the set KPI. (please see Incident Section within this report pg.15)

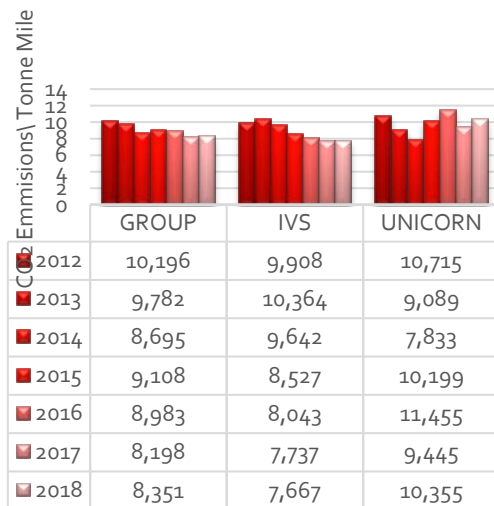
# Environmental Performance

EEOI refers to the Energy Efficiency Operational Indicator, which takes fuel type, cargo and distance into consideration. Over all Grindrod Shipping EEOI has increased by 18% compared to 2012 (Base year).

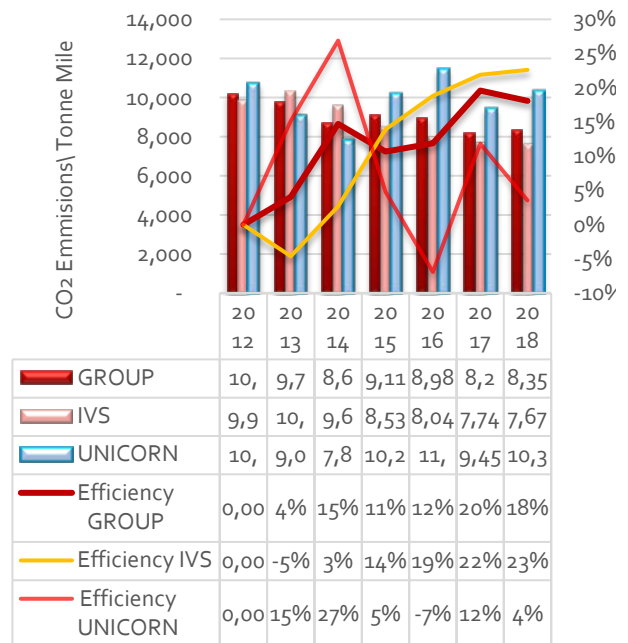
It should be noted that the Unicorn fleet was less efficient than 2014. An analysis of the types of fuel being used showed that in January 2015 50.8% of the fuel burned was HFO which produces significantly higher quantities of CO2. By March 2015 the figure of HFO used was 85%. This trend has continued for the rest of the year with the amount of HFO consumed ranging between 75% and 92%. The increase in HFO consumed is due to the trading patterns of the vessels with most vessels not trading in the ECA areas of Europe and USA. Overall Unicorn total fuel consumption decreased by 14.6%. However, the associated Tonne-Mile variance is 4% more efficient compared to 2012. This indicates that the vessels have been trading with long ballast voyages which has again decreased efficiencies. Our MR tankers have been trading between West Africa and Europe over the last year.

A review of the graphs below confirms that the “2020” objective of becoming 10% more energy efficient on the 2012 base year were achieved in 2018 already.

EEOI for Grindrod Shipping



Efficiency of Fleet (2012 Base line)



The following are the reasons why Grindrod was able to achieve the results:

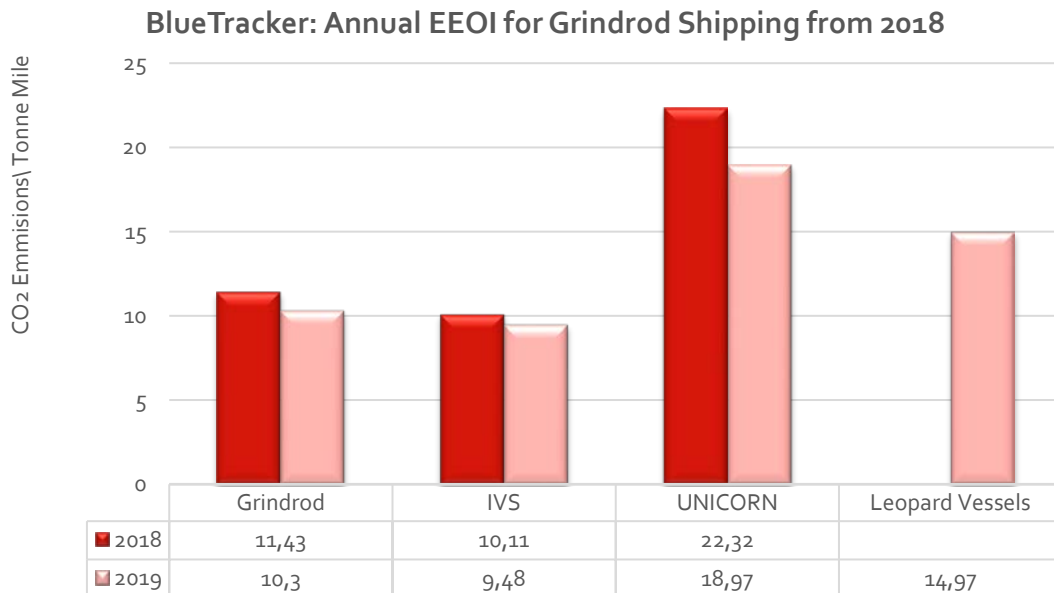
- In an effort to increase the efficiency of vessels, Grindrod has been pursuing an active policy of environmentally efficient designs with regard to new-build projects.
- Variable frequency drives are showing positive results with vessels on average being able to save 15 tons of fuel oil per month per vessel. This can be seen in the increased



efficiencies continue to be realised in the IVS Fleet. The two Tankers are also contributing significantly and are saving on average around 25 Tonnes of fuel per vessel per month.

As of the beginning of 2018 the Company has been using Bluetracker software to compile much more accurate results. The vessels are required to submit on a daily basis consumption onboard. These are reviewed and validated on a daily basis. Additionally, further clarification has been provided by Classification Societies on how to correctly calculate EEOI. A new parameter is to increase efficiencies of the fleet by 2% per annum based on the Bluetracker database.

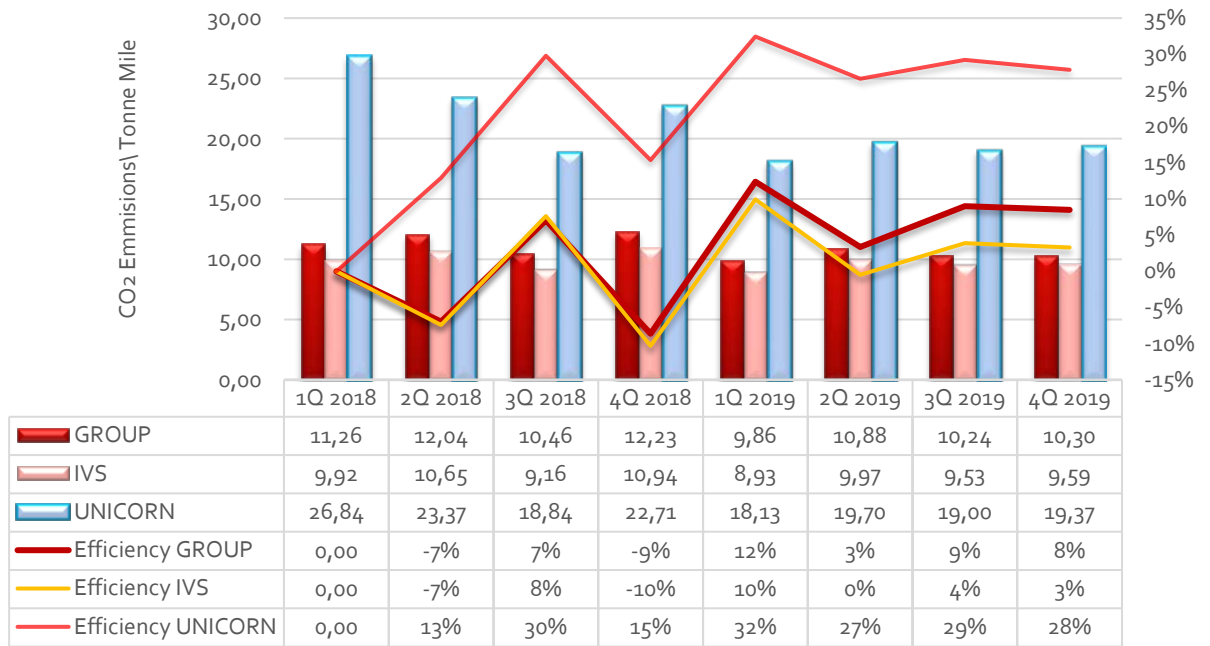
Previously the Company had employed Excel forms to track Environmental and Fuel consumption performance for the fleet to fulfil the requirements of the SEEMP manual. Blue tracker Software is now performing this duty. A review of the vessel's performance as shown in the graphs below indicate that the requirements of the SEEMP manual continue to be met. See Appendix B.



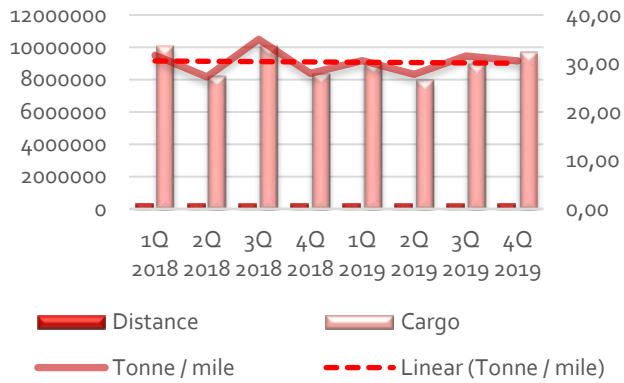
Grindrod Shipping showed an improvement in EEOI efficiency of 9.9% for 2019 based on the 2018 EEOI results. Unicorn showed an improved efficiency for 2019 of 15% over 2018 consumption figures. This is a result of the 4Q 2019 being very efficient in the amount of cargo carried. It should be noted that our Unicorn vessels are old technology compared to the Leopard Vessels with the much newer technology. By comparison the EEOI for the Leopard vessels for 2019 was 14,79.



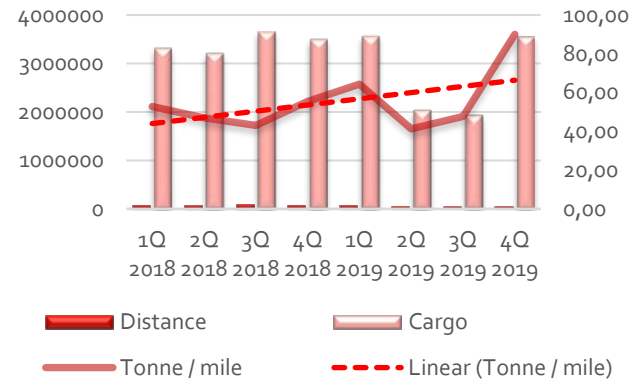
**BlueTracker: Quarterly EEOI of the Grindrod Shipping Fleet from 2018**



**IVS Shipping Cargo vs Distance Travelled**

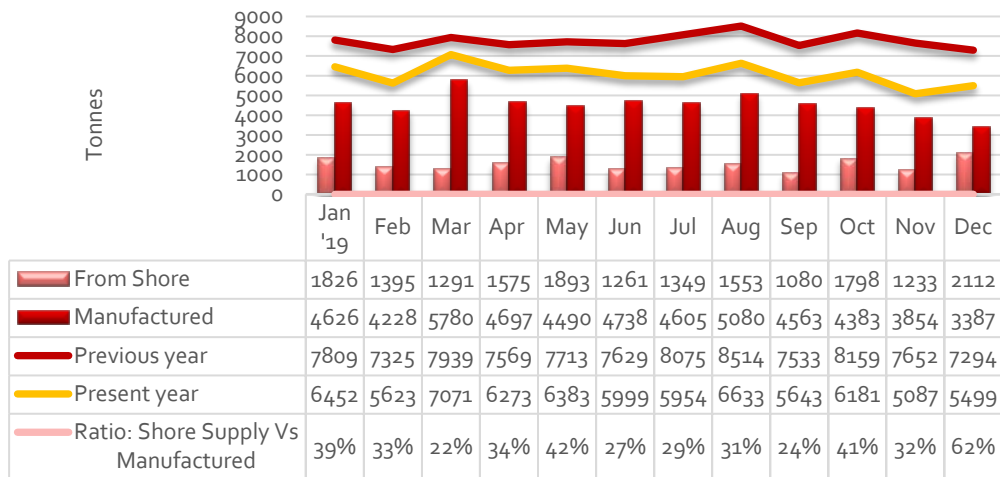


**Unicorn Shipping Cargo vs Distance Travelled**



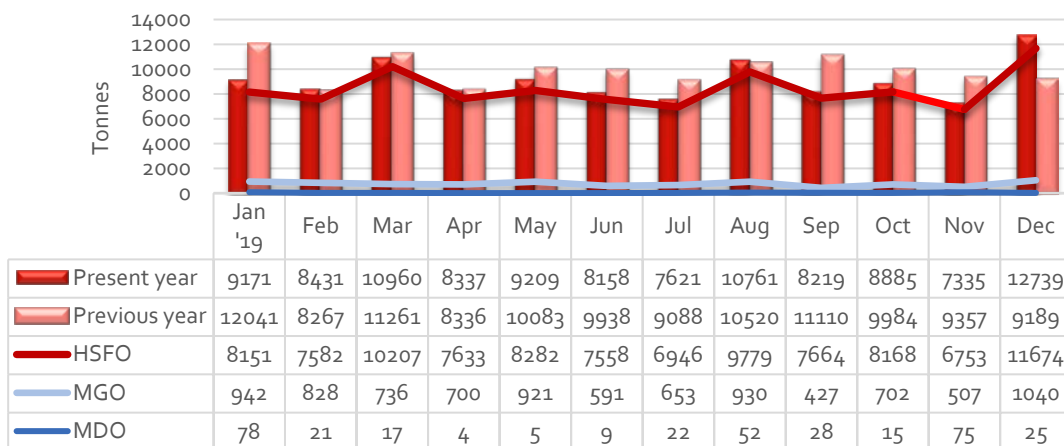
Office management is focusing on educating the Vessel’s staff regarding proactive measures available such as switching off equipment etc. that is on standby or running for no good reason. With the increase of fleet, some of the new crew members have “bad habits” inherited from other fleets that they worked in prior to joining Grindrod.

### Grindrod Shipping Water Usage



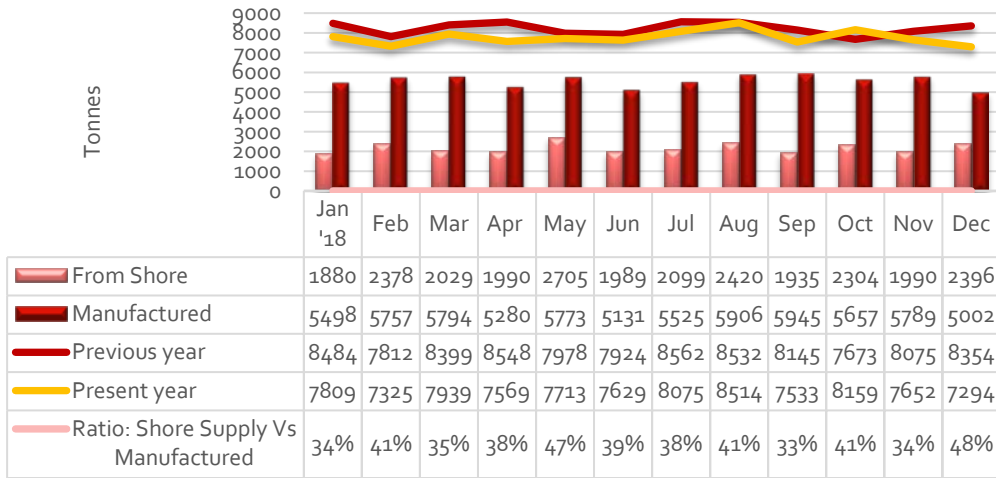
Water consumption is less compared previous years. It should be noted however this is very dependent on cargoes carried and how much tank washing is required for consecutive dissimilar cargoes. Active measures and education are in force for the domestic consumption of water. An additional reason is the sale of 3 Unicorn vessels.

### Grindrod Shipping Fuel Usage



KPI	Comments
<b>Fuel</b>	<p>1- Tracking started in June 2014.</p> <p>2- Potential tax liability for CO<sub>2</sub>e using current thresholds, expected implementation July 2019. YTD totals shown this month, monthly totals will be displayed from July.</p> <p>The increase in Fuel Consumption is due to the increase of the size of Fleet</p>

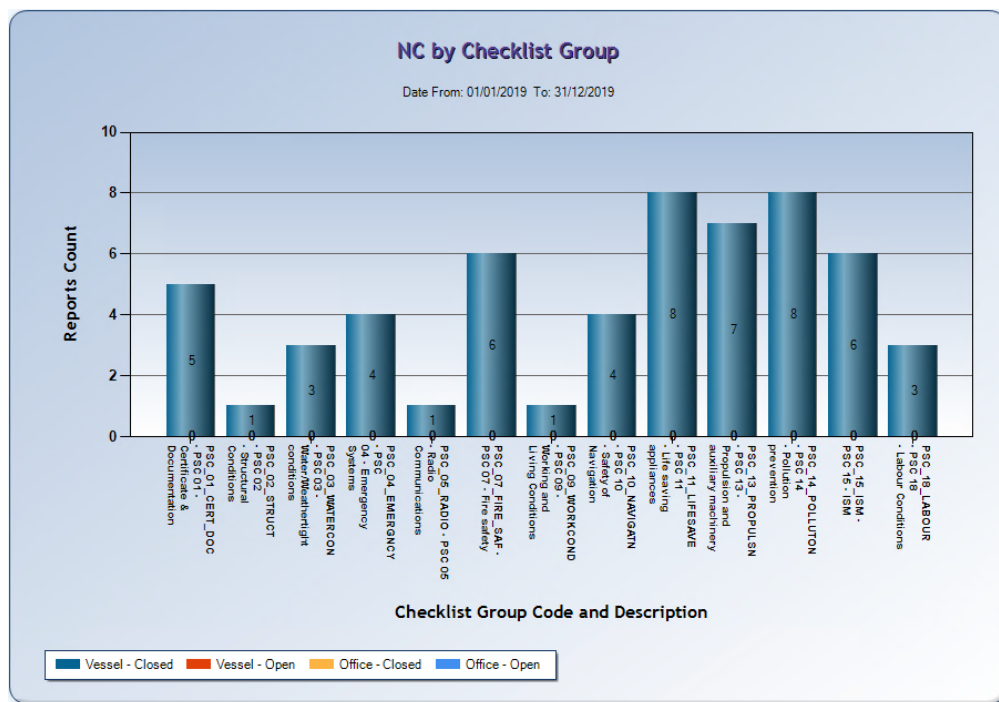
## Grindrod Shipping Water Usage



Water consumption has increased moderately over previous years. It should be noted however this is very dependent on cargoes carried and how much tank washing or hold washing is required for consecutive dissimilar cargoes. Active measures and education is in force for the domestic consumption of water.

## Port State Control

Below is a graph of the defects found by PSC inspectors onboard the IVS vessels. LSA; Pollution and Propulsion systems received the most remarks. These are all high risk and have led to detentions within the fleet.



Year:	2013	2014	2015	2016	2017	2018	2019
Average no observations per inspection	1.5	0.9	0.7	0.65	0.60	0.51	0.81
Detentions	Nil	Nil	Nil	Nil	1	2	0

IVS vessels continue to be the subject Port state control inspections. In 2019 there were 64 (65 in 2018) inspections with 54 (32 in 2018) deficiencies and **0 detentions (2 in 2018)**. Overall, the deficiencies as shown in the graph below shows that Life Saving appliances (3 defects for lifeboats) continue to be the bigger issue. This was also clearly identified in the analysis of the internal audits.

#### IVS HIRONO San Lorenzo, Argentina 26 April 2019: 8 PSC Deficiencies

Two Inspectors were accompanied by two trainees. Their incompetence is highlighted in their findings, which, to say the least, were academic misunderstandings of the practical application of the Codes. None of the findings can be construed to indicate an unsafe ship or unsafe practices aboard.

#### IVS THANDA Taicang China 27 May 2019: 5 PSC Deficiencies

All were academic interpretations, of which three were rejected by NK class as not required.

The others were: Crew with expired Medical Certificates. They were due off at that port, but could not obtain Russian visas. They were relieved two days later in Latvia. The Inspector thus believed the ISM system was not correct and that class need to verify the ISM. This was totally unfounded as well.

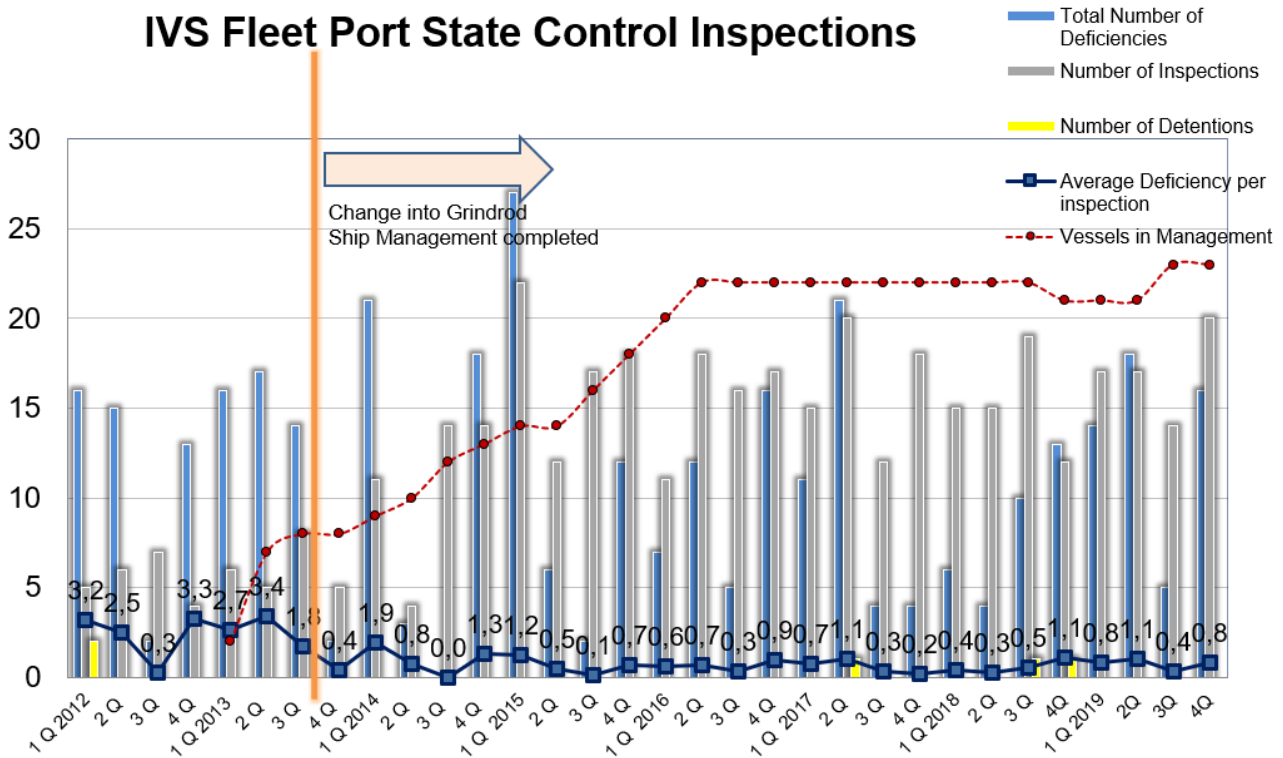
#### IVS KINGBIRD Taicang China 11 June 2019: 4 PSC Deficiencies

All were academic interpretations, of which three were the strictest interpretation of the SOLAS Code. Again, not worthy of serious consideration.

All the above Port State Control observations do indicate the inconsistencies between different Countries. However, when it comes to Australia – IVS had 10 PSC inspections and 13 observations. Generally, the AMSA PSC inspections have some credence w.r.t their observations. All vessels are to note the instructions given to them by the Office on what typically the AMSA surveyor will look for. There were also 4 PSC Inspections in Japan resulting in 7 Observations.

**Unfortunately, all three detentions have been in Australia in the last 3 years. It is now reasonable to assume that the IVS will be regularly and robustly visited by AMSA PSC inspectors because statistically with 3 detentions in 18 months – the IVS Fleet is medium risk.**

## IVS Fleet Port State Control Inspections



## Review of International and Country Specific statutory requirements

Both International Legal and local requirements like EU directives / CARB / ECA /VGP-NPDES, Restrictions on vessels in US & Canada with AGM, US biofouling management plan, prohibition of asbestos containing materials were complied with.

Masters are requested to obtain local requirement for each port well in advance. DNV Navigator Software was commissioned to help the Master with Local Regulations. The Company has now replaced this software with BASSNet Port software which is part of the BASSNet suite.

All statutory requirements as per class / flag / IMO complied with.

### New Regulations review

Company has taken initiative to keep track of the New Regulations coming into force and have taken sufficient measures for implementation of these regulations. New regulations were reviewed and incorporated in company SMS where required. Company has provided REG4SHIPS where all IMO publications and flag state circulars as per new regulations are automatically updated.

The following New regulations were promulgated to fleet and complied with:

- Chinese ports fuel Sulphur requirements 2020,
- Installation of ballast water treatment system which is mandatory as of June 2017- Vessels to comply at Vessel renewal Dry Dock.
- Annual Reporting of VGP to EPA,

- The Manufacturer or his representative is to complete annual maintenance, thorough examination, operational testing and overhaul of launching appliances, lifeboat and rescue boat release gears and davit launched life rafts automatic release hooks shall be carried out, starting 01/01/2020.
- IMO Fuel sulphur requirements for all vessels starting 01/01/2020.
- Hazardous Inventory List to be compiled by end of 2020 to comply with EU requirements.
- Compliance with IMO Data collection system for fuel oil consumption of ships and obtain STATEMENT OF COMPLIANCE
- Prepare Ship execution plan to comply with Indian and Kuwait regulations on single use plastics

All new regulations were reviewed and will be effectively implemented.

## Customer Feedback / Complaints

Grindrod Shipping has filed one complaint against vendors for poor performance. Subsequent meetings and communications between Grindrod and the vendor have led to a satisfactory resolution and improvement of their performance. The vendors are as follows:

- Non-Conformance: Dirks Butchery supplying food with altered expiry dates. Some of the meat we received in Durban on 23rd April 2019 seems to be already expired. The outer packages show that the expiry date is still fine, however the individual packs say differently.

No Complaints against Grindrod Shipping were received in 2019.

## Risk Assessments

The Risk Assessments continue within BASSNet. The quality of risk assessments received from the Fleet remain are starting to improve following Office staff providing guidance whilst sailing on the vessel. The Office representatives are reminded to continue to complete the training of the crew whilst completing their inspections. The Office will continue to prepare Master templates of Risk Assessments for the fleet to use as the basis for their Review of the job description.

## Management of change

Management of change was initiated for several operations during this period for both fleets.

However, in 2018 the Management of Change requirement was removed from the IVS SMS. The MOC requirement is not applicable for the dry fleet.

# Security

All Grindrod vessels comply with International Ship and Port Security (“ISPS”) Code. Furthermore, when transiting in a high-risk area, anti-piracy measures as described in the Best Management Practices 5 booklet remain in force. This is a requirement of the vessel’s insurance provider. Both Unicorn and IVS Vessels regularly enter into High Risk Areas (HRA) and are employing additional security protection to enhance security on board. When entering the HRA, Singapore Flag is notified and approves the use of security personnel on board.

Malaria remains an issue with vessels travelling to West Africa. A risk assessment has been completed and additional countermeasures put in place.

Stowaways: P&I have informed the Office that the incidents of stowaways in the Southern African ports is on the increase and the cost of repatriation now according to the South African Government falls on the Ship Owner. The fleet is to be reminded that they are to remain vigilant and take additional precautions such as shore-based security when visiting South Africa. The requirements of the Ship Security Plan are to be followed to the letter, with no exceptions to the review of stevedore ID’s etc.

## Security:

### **IVS KINGLET January**

At about 04h10 whilst vessel was alongside at Jorf Lasfar Morocco, the deck watchman discovered three unauthorized persons attempting to board the vessel by means of the Forward Mooring Ropes on the Fc’sle Area. The attempted boarding of possible Stowaways / Robbery was aborted and immediately reported to the Master.

### **IVS GLENEAGLES February**

After berthing at Durban Maydon Wharf No.5 At 05h25, prior to starting discharge of cargoes in cargo hold no. 4, a crew member noticed one trespasser on the Mechanical unloader running along the gantry which was being positioned over hold 4. The trespasser jumped off the gantry into cargo hold no. 4 which was full of grain.

The ship's security officer ordered the trespasser to leave the vessel. The trespasser left the vessel without any hesitation. The Durban port security officer was informed about the incident.

# Company and ship resource levels review

## Company Resourcing Levels

To stay competitive in today’s marketplace, it has been company’s senior management commitment to develop Human Capital and provide adequate Human Resource whether it is at sea or ashore from its inception.

With company's long-term goal in mind, company has developed world class infrastructure and work place conducive to develop talent which can support the business and deliver performance and expectations of our client we serve.

In our effort to continually improve quality of ship's staff as well as shore staff, we have well adapted systems for training and strategy to monitor and retain the manpower across the organization by means of the Induction program and the Seagull training systems.

Company's fleet growth is monitored monthly so that all resources (manpower, equipment, space, etc) are adequate for current fleet and for the intended expansion.

Adequate shore-based support is provided to enable the designated person to carry out his functions

Ship resources are well above the IMO minimum safe manning requirement. However, the Management is currently reviewing minimum resourcing levels and is proposing the amendment of the Safe Manning Certificate (reduction of one Engineer Watch keeper and one other deck rating/personnel) in order that the Company does not have to approach the MPA should the current manning levels be below the present Safe Manning Certificate.

Company continues recruiting and training cadets on board vessels.

Ship and shore-based resources were reviewed and found adequate for safe operations.

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## MLC / Crewing matters

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Crewing matters were found satisfactory.

Health and hygiene bulletins were regularly promulgated to ship staff.

MLC effectively implemented on all vessels

## Review of rest hours within the Fleet

The work and rest hours regulations are becoming more and more strict and the inspectors /auditors are scrutinizing work & rest hour and non- compliance records more and more closely and in depth. Guidance from office was provided to avoid non-compliance onboard. Accordingly, ISF Watchkeeper software was provided on board for implementing rest hours in 2017. The Masters are required on a weekly basis to examine any transgressions and provide an explanation to the DPA regarding transgressions.

Rest hours noncompliance / violations are being reported by Master to company and monitored. The Master is to ensure that both he and the crew member is to sign the monthly work/rest hours of the crew member. This signed copy should be made available to the crew member should he want a copy.

Extra manning also being provided on board (case by case basis)

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## Review of Surveys (certification, Existing COC, Major Memo, significant issues)

All the vessels have been adhering to Class requirements and survey schedules during the year.

Condition of class / memo monitored by ship managers and tracked to completion

## Review of dry docking

Dry-docking of vessels carried out in consultation with the Owner.

Stern tube seals and oil was changed to new Bio degradable type to comply with new US VGP regulations.

COC for vessels to be closed as applicable during dry-dock.

A new reporting method has been introduced which makes full use of COLLIGO in the technical section.

## Review of BASSNet

Company staff continued to motivate the personnel on-board to continue using BASSNet.

June 2019 saw the role-out of BASSNet 2.10. The appearance of 2.10 appears to be the same as 2.9 however there are numerous 'behind the scenes' improvements in reporting and monitoring of the functionality of BASSNet. Company staff should continue to motivate the personnel on-board to continue using BASSNet.

Project Team comprising of IT and BASSNet Support working to ensure proper implementation / follow up of the BASSNet 2.10 system.

Technical inspections and Audit reports are uploaded in BASSNet. With the continued reliance on BASSNet, Modules such as Drills and Port Operations and HR Manager will see BASSNet being more central to the operation of the Fleet.

## Suitability and effectiveness of the HSEQ system

The second half of 2014 has culminated with a re-write of the Safety Management System which was published to the vessels during August 2014. There were significant upgrades completed to all Manuals within the system.

COLLIGO was also rolled out to the Fleet which is a more streamlined document control and month end reporting system using a more automated process.

Due to Cyber Security related issues the Internal/External SMS has been upgraded and modernised. All can now access the SMS via Ipad's etc when at home and not onboard the vessel.

## Review of training needs

Training is required on the Risk Management Module for the office staff and sea staff. This has been developed and training been conducted during the ship visits done by shore staff. The BASSNet program has also developed an Interactive training program which has been deployed to the vessels for their review.

A new on signers Induction Program has been rolled out during the last quarter 2014. The Induction program caters for all new AND existing crew – from the SMT to the ratings. It is an Introduction to Unicorn/Grindrod and the SMS. All Crew will be obliged to complete this course prior to acceptance into Unicorn onboard the vessels. The average duration of the course is around 5 hours. However due to the changes that have been completed within the Grindrod Structure, there is now a requirement to upgrade the introduction module of the Induction Program.

NVOD has been replaced with SEAGULL which is seen to be a more relevant and up to date training software package. Additionally, Officers will be required to complete Bulker BICS prior to promotion. It is important that the Marine Superintendent monitors the progress of the fleet to ensure that the crew takes advantage of this resource.

In 2019 the Office concentrated a little more on “soft skills” and encouraged a Mentorship program so that the SMT can empower the junior officers to become a more skilled and complete officer.

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### Training of Company Personnel:

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Company staff have attended shore-based training conducted by authorized training institutes to continually improve skills required for ship management.

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## Training of Shipboard personnel

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Basis various recent changes in the industry, feedback received from vessels and vessel inspection findings, incident reports; the Office identified the gap between existing training and the requirements on board. Training resources are identified considering the increase in demand for ship staff expected in near future.

To address this gap in training and better preparation the Office is customizing new courses and updating, revising and upgrading the existing courses accordingly. There is continuous flow of information from the Ship to the Management office and to the training centres.

- All joining crew were trained for company's HSQE management system by each manning company.
- Pre-joining briefing was carried for senior personnel in company prior joining a vessel.
- Company has provided Seagull CBT and training plan to all vessels.
- All crew for new building ships were trained by DPA after selection by interview, and at the shipyard before the ship's delivery.
- Sea staff seminars were conducted by company staff.
- OJT were carried out for ship staff on navigation and HSQE matters.
- Regular HSQE campaigns were promulgated to ship staff.

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## Drills

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Ship/shore SAFETY AND SECURITY drills were conducted regularly and found satisfactory.

Report of ship/shore drill shared with fleet.

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# Performance Indicators

## SAFETY, HEALTH, ENVIRONMENT AND QUALITY (SHEQ)

<b>2019 HSE INCIDENT STATUS – HOW ARE WE DOING?</b>							
<b>INJURIES AND DEATHS</b>	<b>2018</b>	<b>Quarterly Results</b>				<b>2019</b>	
	<b>Results</b>	<b>1Q</b>	<b>2Q</b>	<b>3Q</b>	<b>4Q</b>	<b>Target</b>	<b>Actual</b>
<b>Deaths</b> <i>(Unnatural or Accidental)</i>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Lost Time Injury</b> <i>(Day Away from Work)</i>	<b>8</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>8</b>
<b>Medical Treatment Cases</b> <i>(External treatment/assistance req'd)</i>	<b>13</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>9</b>	<b>5</b>
<b>First Aid Cases</b> <i>(On-board treatment only)</i>	<b>7</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>12</b>	<b>7</b>

<b>SPILLS AND EMISSIONS</b>	<b>2018</b>	<b>Quarterly Results</b>				<b>2019</b>	
	<b>Results</b>	<b>1Q</b>	<b>2Q</b>	<b>3Q</b>	<b>4Q</b>	<b>Target</b>	<b>Actual</b>
<b>Spill</b> <i>(Into the Environment)</i>	1	0	0	0	0	0	0
<b>Minor Spill</b> <i>(Contained and &lt; 1 bbl)</i>	0	0	0	0	0	0	0
<b>Contained Spill</b> <i>(Contained and &gt; 1 bbl)</i>	0	0	0	0	0	0	0
<b>Spill</b> <i>(Any quantity into the water)</i>	0	0	0	0	0	0	0

<b>MATERIAL LOSSES</b>	<b>2018</b>	<b>Quarterly Results</b>				<b>2019</b>	
	<b>Results</b>	<b>1Q</b>	<b>2Q</b>	<b>3Q</b>	<b>4Q</b>	<b>Target</b>	<b>Actual</b>
<b>Catastrophic Damage/Loss</b> <i>(Greater than \$1 000 000)</i>	0	0	0	0	0	0	0
<b>Massive Damage / Loss</b> <i>(\$500 000 TO \$1000 000)</i>	0	0	0	0	0	1	0
<b>Serious Damage / Loss</b> <i>(\$5000 to \$500000)</i>	1	0	0	0	0	8	0
<b>Minor Damage / Loss</b> <i>(Less than \$5000)</i>	3	0	2	0	0	13	2

<b>Quality and Customer Service</b>	<b>2018</b>	<b>Quarterly Results</b>				<b>2019</b>	
	<b>Results</b>	<b>1Q</b>	<b>2Q</b>	<b>3Q</b>	<b>4Q</b>	<b>Target</b>	<b>Actual</b>
<b>Unplanned off hire as a result of our management failure</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Cargo Contaminations</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Customer Complaints</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

- Items marked with an asterisk are reflected within the Un-planned off hire records, and are recorded separately for analysis purposes only

<b>Best Practise</b>	<b>2018</b>	<b>Quarterly Results</b>				<b>2019</b>	
	<b>Results</b>	<b>1Q</b>	<b>2Q</b>	<b>3Q</b>	<b>4Q</b>	<b>Target</b>	<b>Actual</b>
<b>Near Miss Reports FOR IVS FLEET only</b>	<b>1167</b>	<b>236</b>	<b>278</b>	<b>265</b>	<b>278</b>	<b>1057</b>	<b>1167</b>

### Positive outcomes

- No fire incidents
- No PSC detentions
- No permanent total disability / Permanent partial disability

### Areas which require improvement

- Navigation
- The vessel completing forms which have been supplied via the SMS
- Average PSC deficiencies per vessel per inspection is about 0.81(0.51 in 2018)
- Use of BASSNet Risk Assessment Module

## Action plan for continual improvement 2020

Refer to attached sheet for action plan

S.NO	Item	PIC	Target date	Status
1	Enhance safety culture on board through monthly campaigns and upload the same in SHEQ website	DPA	MONTHLY	Commenced and will be implemented every month
2	Promote health bulletins and upload the same in SHEQ website	DPA	AS REQUIRED	Commenced and will be implemented
3	Identify on the job training needs for various shipboard activities and promulgate the same to fleet.	DPA	AS REQUIRED	Commenced and will be implemented
4	Incorporating maintenance of FFA on BASSNet	SUBU	JULY 2020	PENDING
5	Review manning levels of all vessels in the fleet as required by MPA circular	HILTON	AUG 2020	PENDING
6	Consolidate Navigational services to single service provider (chart world)	DPA	JAN 2020	COMPLETED
7	Migration of SHEQ	ZAIN	DEC 2020	PENDING
8	Implementation of new training modules in SEAGULL	MIKE MELLY	MAR 2020	COMPLETED
9	Changeover of ECDIS from FURUNO to Chartworld if installation date of Furuno ECDIS exceeds 5 years	Ship Manager	AS REQUIRED	during dry dock
10	Revising quarterly store forms	HILTON	JUL 2020	PENDING
11				
12				
13				

# Appendix 1: Masters review

## Summary of Masters Review – 2020 review

Vessel	SUGGESTION	ACTION PLAN	PIC	STATUS
TEMBE	Can vessel have own Excel Form/Spreadsheet for the calculation of Sounding of Ballast, Bunkers and Draft Survey.	NIL  Vessel to use only ship yard provided booklets/ plans/manuals for calculation of Sounding of Ballast and Bunkers. No unauthorized software shall be used for this purpose.	NA	CLOSED
WENTWORTH	3.2.2 HSEQ REPORT – Item 2 STCW section A VII/2 part 4 – stated watch keeping in port need to be amend to watch keeping at sea	Form 3.2.2 to be amended	RAJA	Completed on 02 April 2020
	Since we are paper less, suggest to have a tablet or any other portable equipment to do bridge and engine checklists electronically and store data in order to make sure that checks are done in detailed.	Presently our Company is not considering tablet for this purpose and vessel shall continue using the laminated checklists and make entries in log books	NA	CLOSED
HIRONO	Kindly remove the DNV port in item no. 34, DNV program has been removed on board and replaced by ISF and Bassnet port docs.	Form 5.1.6.1 to be amended	RAJA	Completed on 27 Mar 2020
	SHEQ / Slop chest and Bond Section 13.2 with the custodian of the store will receive a monthly payment of USD 50. This payment has been removed from last year	Fleet procedures manual chapter 13.2 to be amended	Warren	Completed on 02 April 2020
	SHEQ / Accounting guidelines Section 18.0 with wrong PIC and e-mail in page 2,3,6 ( previous personnel Capt. Salasalan and Capt. Terroza still in this section).	Fleet procedures manual chapter 18 to be amended	Warren	Completed on 20 Aug 2020
	SHEQ / Accounting guidelines Section 18.0 page 9 – b. Allotment computation > Allotment shall commence from the date of departure from the Philippines to join the vessel with the divisor basis in present service period ( Service Period January 17 - 31 (15 days) / Service Period February 12 - 28 (17 days) / Service Period April 17 - 30 (14 days). "AS PER CBA , WAGES ARE CALCULATED ON A 30 DAY MONTH". The SHEQ / Accounting guidelines Section 18.0 - page 9 must change to wages must calculated on a 30 day month.	CBA amended	FELICIA	Completed on 4 Feb 2020



GLENEAGLES	NIL	NIL	NA	CLOSED
SWINLEY FOREST	NIL	NIL	NA	CLOSED
BOSCH HOEK	ADP - We have no access to newly bayed areas 1&2. Received activation key in December but it is not work. Master sent several emails regarding that issue. W/out support from IT we are not able to fix the matter.	To liaise with Chart world and fix the issue	RAJA	CLOSED / COMPLETED ON 28 JAN 2020
RAFFLES	NIL	NIL	NA	CLOSED
TRIVIEW	Availability of CBT program on type specific ECDIS on board for Nav Officer that does not have specific training certificate (NM 3.2 Familiarisation Training)	CBT program sent to vessel	RAJA	CLOSED
PHINDA	NIL	NIL	NA	CLOSED
THANDA	NIL	NIL	NA	CLOSED
SENTOSA	NIL	NIL	NA	CLOSED
ORCHARD	The vessels Class approved plans eg: Ballast water Management, Damage control plan, Garbage Management etc. etc. are filed in files that were available on board at the time. It is time that a Standard type of Grindrod file is introduced to keep all these documents in as we have achieved with the Grindrod stationary that is uniform in the fleet now.	All original / drawings plans shall be kept in the original boxes provided by shipyard.  All vessels shall follow this procedure.	NA	CLOSED
KNOT	SMT suggest that reporting forms (monthly and weekly) and checklist forms must be reviewed thoroughly and sincerely as such duplication will be avoided and mistakes will be dealt specifically and accordingly. Redundancy reports can only lead to confusion which adds workload and stress both shipboard and shore personnel. Unnecessary company forms should be removed from the system and monthly/ weekly reporting list should be established and updated by the HSEQ manager	Review on quarterly basis	SHEQ Manager/ DPA	CONTINUAL JOB - CLOSED
KINGLET	NIL	NIL	NA	CLOSED

SUNBIRD	No. 22 – We suggest that the form indicates on its title for whom exactly the specific form is for (e.g. 4.01.02 B1 Record of Ship Specific Familiarisation Training (GS) DECK OFFICERS) so it's easier for us to download which form is needed rather than downloading and checking the forms one by one.	Title of the forms to be amended	Brett	CLOSED ON 21 JAN 2020
NORTH BERWICK	NIL	NIL	NA	CLOSED
IVS MERLION	In Bassnet especially (2 CARGO MATTERS) A redundancy of cargo documents are need to be uploaded in each sub-folder under Cargo matters, I would suggest that cargo documents must be segregated in every port of loading and discharging to avoid redundancy.	NIL	NA	CLOSED
SPARROW HAWK	<p>Senior officers need to take a far more pro-active role in mentoring; supervising and monitoring subordinates. In order to do so, they must ensure that their own knowledge of the SMS is satisfactory – and that check lists; permits; risk assessments are properly implemented, rather than becoming a paperwork exercise.</p> <p>To this end the use of “generic” risk assessments must be avoided, and the specific hazards of the actual task at hand addressed.</p> <p>Some form of incentive should be introduced to encourage the reporting of Near Misses; Non Conformances etc. This would ensure that potential threats are not simply ignored or concealed, as seems to be the current norm.</p>	<p>Senior officers should know the SHEQ system and have to play a vital role in mentoring juniors.</p> <p>We request ships senior officers to voluntarily mentor the junior officers. Company has also started a mentoring program and has already sent 4 mentoring letters to entire fleet.</p> <p>Generic risk assessments are just standard templates for any task/activity. Ship staff shall ensure that these are used only as guidance and prepare risk assessment based on all the hazards for the specific task in hand.</p> <p>Regarding near miss reporting, We encourage each officer and crew to voluntarily report all near miss situations.</p> <p>At present Company will not offer any initiatives for reporting near miss situations.</p>	NA	CLOSED
IVS PRESTWICK	<p>Form 1.07.01 Certificates and Documents (GS) (Rev. Date: 28 Dec. 2015) should be revised for easy reference, updating &amp; Filing in 3 Sections such as:</p> <p>Sec. A – Trading Certificates (Class &amp; Flag State issued Certificates)</p>	Company will consider this suggestion and will incorporate the same in bassnet by end of this year	SUBU	<b>ACTION PLAN – DEC 2020</b>

	<p>Sec. B – Supplementary / Minor Certificates (attachments to Class &amp; Flag State Certificates, if any including ITF, P &amp; I, US, Canada, etc.</p> <p>Sec. C – Equipment Certificates, Plans &amp; Drawings (Test, Conformity, Services, etc.)</p>			
IVS KESTREL	The use of Chart World Services has begun early this year and like other chart providers (e.g. Voyager 7), the same must be installed in Master's laptop which must be updated on a regular basis.	Not required as per chart world.	NA	CLOSED
IVS KINGBIRD	NIL	NIL	NA	CLOSED
IVS OKUDOGO	NIL	NIL	NA	CLOSED

**Reviewed during annual management review by:**

Hilton - Marine Manager

K. Rajaraman - DPA

Brett – SHEQ Manager

James- Marine superintendent

Warren King – Crewing Manager

## Appendix 2: SEEMP review

Date of Review	Reviewed by	Remarks
09 June 2020	Brett	<ul style="list-style-type: none"> <li>SEEMP reviewed and found adequate for the intended trade of each vessel.</li> <li>Monthly environment reporting form updated by each vessel and sent to Company.</li> <li>Data required for computation of energy efficiency operational index (EEOI) is received from the vessels at defined interval.</li> <li>SEEMP data was tracked and monitored through Blue tracker software</li> <li>Each vessel is in compliance with EU MRV and IMO DCS requirements</li> <li>Maintenance policy continually reviewed to stop leakages, wastages and to ensure optimum performance of machinery through regular monitoring of PMS reports and defect reports from vessels and through feedback from vessel staff.</li> </ul>

Energy efficiency Measures	Compliance (Yes/ No/N.A )	Remarks
Speed Selection Optimization	Yes	Satisfactory
Optimized Route Planning	Yes	Satisfactory
Optimized Heading Control / Auto-pilot Function	Yes	Satisfactory
Optimum Ballast	Yes	Satisfactory
Optimization of Load on Generators	Yes	Satisfactory
Boiler and Steam load optimization	Yes	Satisfactory
Exhaust Gas Economizer Efficiency	Yes	Satisfactory
Mooring and Winches	Yes	Satisfactory
Port / Anchorage Operations	Yes	Satisfactory
Cargo Loading and Unloading	Yes	Satisfactory
Lighting on board	Yes	Satisfactory
Working in Galley	Yes	Satisfactory
Ship's Laundry Equipment	Yes	Satisfactory
Hull and Propeller Condition	Yes	Satisfactory
Handling of Oil Residue (Sludge)	Yes	Satisfactory
Bunker Heating	Yes	Satisfactory
Variable frequency drive ( where applicable)	Yes	Satisfactory
Company's ENVIRONMENTAL REPORT form	Yes	Satisfactory
Fuel oil consumption	Yes	Satisfactory
Biofouling measures	Yes	Satisfactory
Switching off equipment when not in use	Yes	Satisfactory
Just in time operations	Yes	Satisfactory
Propulsion System Maintenance	Yes	Satisfactory
Other measures	Yes	Satisfactory