

Guidance to SIRE 2.0 Key Points



Ref: 020

8.3.22 Cargo doping and additives (NEW) / TMSA 6.3.3

8.3.22. Were the Master and officers familiar with the company procedures for managing on-board doping operations, and had these procedures been complied with?

Short Question Text

Cargo doping and additives.

Vessel Types

Oil, Chemical

ROVIQ Sequence

Cargo Control Room, Main Deck

Publications

ICS: Tanker Safety Guide (Chemicals) - Fifth Edition

IMO: ISM Code

OCIMF/ICS: International Safety Guide for Oil Tankers and Terminals. Sixth Edition.



ROTATIONAL

Inspection questions focused on preventing/mitigating risks that could indirectly lead to a catastrophic risk event or directly lead to a lower risk event.



Hardware

None



Process



Graduated



Human



Graduated

Objective

To ensure on-board doping operations are properly planned, risk assessed and performed safely.

Potential Grounds for a Negative Observation

- There were no company procedures for managing on-board doping operations that included:
 - Reviewing the supplier's/contractor's doping plan.
 - Performing a risk assessment of the proposed operation.
 - Supervising the doping operation.
- The officer responsible for cargo operations was not familiar with the company procedures for managing on-board doping operations.
- The vessel had not been provided with the supplier's/contractor's plan for an on-board doping operation.
- A risk assessment had not been performed based upon the supplier's/contractor's plan for an on-board doping operation.
- The doping plan and/or risk assessment did not include:
 - Any flammability or toxicity hazards associated with the additive.
 - The method of doping to be used and any operational restrictions.
 - Arrangements for supervision by ship's crew.
 - PPE and handling equipment requirements.
 - Contingency measures including the method of clean-up of any spillages.
 - Storage arrangements of any additives to be carried on board.
 - Appropriate anti-static precautions if tanks were not inerted.
- There was no evidence that the doping plan and/or risk assessment had been discussed by all personnel involved on the ship and in the terminal, including contractors.
- There was no Safety Data Sheet:
 - Available for the additive(s) used for doping.
 - Kept in the vicinity of the doping operation.
- Doping had taken place via an open tank lid when alternative methods were available.
- The doping method utilised involved free fall of additives into non-inerted cargo tanks.
- Additives were stored on board in a manner that did not reflect the flammability or toxicity hazards indicated in the associated Safety Data Sheet.
- Pressure test records were not available for the injection system used for doping.
- PPE as required by the doping plan and/or risk assessment was not being utilised.



Process



Human



Process