



GMS

Gallagher Marine Systems

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To: Our Compliance Partners,

SCOPE OF GMS TECHNICAL SERVICES UNDER THE WAYPOINTS PROGRAM

Dear Madam/Sir,

We are pleased to provide you with the details and scope of our Technical Services (TS) offered under our WAYPOINTS program. Please also refer to the attached document which provides further information regarding WAYPOINTS.

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

mAuditor App-based Audits and Inspections

As innovative leaders in what we do, we recognized early that the maritime world will increasingly use app-based products for management of inspections, audits, logistics, maintenance and other critical management functions. In Jan 2020 GMS-TS adopted this app-based auditing and inspections tool.

Here are some of the prominent features that make mAuditor app-based solutions attractive:

- GPS connected for tracking attending Superintendent safety, if required.
- Easily incorporate various media attachment - photographs, video, voice etc.
- Voice-to-text feature could be used to dictate comments and audit findings
- Seamless platform from mobile phone to desk top, lap top or tablet mode.
- All material and data by GMS-TS, keeping checklists current.
- Reduces inspection management time and report delivery time.
- Assists in our continuous improvement process
- Powerful analytical tools that could quickly provide trend patterns and analysis.

(For more information, visit the mAuditor website [here](#))

GMS – Headquarters
New Jersey | USA

Marispond Hellas, Inc
Piraeus | Greece

GMS – Southwestern Europe
Naples | Italy

GMS – Japan, LLC.
Tokyo | Japan

GMS – Singapore
Singapore

GMS – Field Offices

Los Angeles, California | Miami, Florida | Honolulu, Hawaii | Houston, Texas | Port Arthur, Texas | San Francisco, California | Wilmington, North Carolina | Richmond, Virginia | Seattle, Washington



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 14011 & 9001 certified Lead Auditors and Project Managers with extensive experience specific to several types of ship attendances, audits, inspections, and ship board training. They are former Masters, Chief Engineers, Class Surveyors, U.S. Coast Guard Officers, and Port State Control Officials - some of who 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 300 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 over 24 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 in excess of 120 ships.

GENERAL AUDIT/INSPECTION OVERVIEW:

All 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.



- 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 by GMS 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 of 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 so 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 trainings you inquired about. GMS can provide other types of auditing services upon your request.

1. 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



2. ISPS & MTSA Services

GMS has a history of preparation of Ship Security Plans which includes ship security assessment and vulnerability study. GMS has conducted several initial and renewal ship security assessment audits for several shipping companies.

Time required: Various - Job Specific

3. ISPS Shipboard Security & Table Top Exercise

GMS shall design the required exercise to comply with ISPS Code PART A/13 and Part B/13. This can be done for both Shipboard Exercise and Office Table Top Exercise. 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 table top exercise: 6 hours

4. Voluntary Environmental Assessment & Conformance Audit (VEACA)

This is a GMS developed Environmental Assessment Program. It is a detailed audit and comprehensive assessment focusing on all aspects of environmental protection. It includes an audit of SMS-related procedures pertaining to environmental protection, an audit of your company's ISO 14011 program (if existing), and a review of records and documents such as oil record book, environmental tags/seals (if used), ballast water and bio-fouling and sediment control management, Vessel General Permit (VGP) compliance, SOx & NOx management, and garbage management and includes 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: 1 working day

Comprehensive equipment and machinery assessment VEACA: 2 sailing days

5. Comprehensive Navigational Safety & BTM Audits (Complies 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, log book 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 ISM/SMS, and best management practices adopted by the industry. The audit report is comprised of the audit checklist and brief descriptive summary of findings.



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

6. Pre-USCG Boarding, PSC, & Certificate of Compliance Examinations - Inspection & Training

This inspection and training 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. A thorough physical inspection of the vessel, its equipment, LSA, FFA, environmental protection measures, and statutory records is carried-out in similar fashion as the USCG PSC Inspectors would conduct. The inspection is conducted using the USCG’s PSC boarding checklists 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 the PSC regime. During the course of the inspection, several critical and pertinent equipment are tested to ensure proper functioning. Additionally, real time boat and fire drills are conducted for evaluation and adequacy. Ship security conformance is assessed as per the SSP and local special requirements. All requirements for calling the U.S. are discussed in detail, and questions are answered fully. Pre-U.S. arrival advice is sent to the ship for self-preparation.

Shipboard time required to conduct the audit: 1 working day

7. 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 Arrivals Checklist, 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

8. 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 VGP, best management practices, documentation required, and how to handle non-conformities. The classroom training is followed up with 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

9. Ballast Water Management Shipboard Training

This training is a comprehensive classroom-based training including documents, records, 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. 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 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: 6 hours

10. Pre-Vetting (OCIMF, CDI) Inspection - Ships & Barges

This inspection is conducted as per OCIMF SIRE or CDI inspection requirements and protocol. 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 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

11. TMSA-3 Services

GMS has conducted office reviews for TMSA to benchmark and audit management systems for TMSA conformance and stage rating. GMS 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

12. Biofouling Management Plan & Record Book (BMP & R)

GMS prepares ship-specific biofouling management plans and record books. The plans fully satisfy and comply with the IMO recommendation as per MEPC.2-7(62) and compulsory requirements as per the U.S. fouling maintenance procedures, EPA VGP, and state of California requirements. On request, the plan can include the New Zealand ballast management requirements (Ministry of Primary Industries - Craft Risk Management Standards).



13. 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.

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

GMS has conducted several such inspections and has 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

15. 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



September 2, 2020

We can always conduct these audits, inspections, and trainings concurrently, time and vessel schedule 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 trainings mentioned above to specifically suit your needs.

Price quotes for the above services are provided upon request.

Please contact us at info@chgms.com or at waypoints@chgms.com regarding any GMS questions or to further discuss, restructure, or schedule any of the above detailed audit or training services.

Yours sincerely,

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ISO: 17021:2015 Accredited

[Services](#)

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