



**TECHNICAL CIRCULAR No. 595 of 05<sup>th</sup> December 2019**

To	All Surveyors/Auditors
Applicable to flag	All Flags
Title	<b>Deficiencies – Survey Reporting</b>
Reference	CONARINA-Survey Instructions

**Deficiencies- Survey Reporting**

1) Survey reporting - Deficiencies

One or more applicable type of deficiency should be reported in a Statement/Observation in the final report.

- i) Deficiencies relating to technical conditions which may lead to the limitation, suspension or withdrawal of a Class or Statutory Certificate;
- ii) Deficiencies caused by deviation from operational requirements;
- iii) Deficiencies relating to deviation from requirements for documentation and reporting;

Other deficiencies which may seriously affect the safety of ship, personnel or the environment. The following shall not be reported by the surveyor:

- i) technical deficiencies, which are considered normal wear and tear for the ship type and age;
- ii) deficiencies which have already been identified by the company or the crew, reported as appropriate, and are being dealt with adequately by the Company including the personnel working on board.

The report need not be issued when:

- i) at surveys/attendance resulting from Port State or Flag State detentions there is evidence available that the organization responsible for the SMS audit of the ship has been notified and is also required to carry out an additional ISM audit;

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- ii) ii) an auditor from the organization, responsible for the SMS audit of the ship is present on board performing an audit and a surveyor has communicated the deficiencies directly to the auditor. This shall be documented.

Guidance for what to report:

### **Category of deficiencies- Examples**

#### Technical deficiencies

- Combination of deficiencies, that together indicates that the maintenance system is not effectively implemented.
- Poor condition of hull, main deck, closing appliances, railings, ladders.
- Defective/missing fire fighting and life saving appliances, oil pollution prevention equipment.
- Leaks and oil in E/R spaces, pump-rooms etc.
- Deficiencies relating to technical conditions which may lead to the limitation, suspension or withdrawal of a Class or Statutory Certificate.
- Combination of deficiencies, that together indicates that the maintenance system is not effectively implemented.
- Poor condition of hull, main deck, closing appliances, railings, ladders.
- Defective/missing fire fighting and life saving appliances, oil pollution prevention equipment.
- Leaks and oil in E/R spaces, pump-rooms etc.
- Deficiencies relating to technical conditions which may lead to the limitation, suspension or withdrawal of a Class or Statutory Certificate.

#### Documentation Deficiencies

- Expired classification or statutory certificates or certificates not endorsed as required.
- Overdue surveys, overdue audits or overdue conditions of class.
- Ship's copy of Document of Compliance (DOC) not valid or not relevant to ship type.
- Original Safety Management Certificate (SMC) has incorrect data or endorsements missing.
- Emergency response plans and relevant SOPEP manual not available (contact points ashore should be current and corresponding with Company name/address on DOC and SMC).
- Entries for relevant drills etc. in Logbook not completed in accordance with mandatory requirements.

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- Incorrect or missing entries in the Oil Record Book.
- Fire Plan not up to date.

Operational deficiencies

- Accidents and hazardous occurrences not reported to the Company.
- Crew not able to satisfactorily conduct practical demonstrations of shipboard operations, such as starting the fire pump, emergency generator, lifeboat engine, etc.
- Crew not able to communicate effectively in the execution of their duties.
- Inability of crew to perform satisfactorily mandatory drills such as fire drills, LSA drills, pollution prevention drills, etc.

Other deficiencies

- Ship's complement not complying with the Minimum Safe Manning Certificate.
- Master, officers and ratings not certified as required by the STCW Convention.
- Serious deficiencies in respect to housekeeping and maintenance of galley, crew accommodation, and provisions stores.
- Port State or Flag State detentions if no evidence available, that the organization responsible for the SMS audit of the ship as specified in the Continuous Synopsis Record has been notified.

REFERENCES:

- CONARINA – Instruction, Courtesy of ABS
- ATTACHMENTS: No

Kindest Regards,

Val Bozenovici  
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