



TECHNICAL CIRCULAR No. 710 of 6th December 2021

To	All Surveyors/Auditors. All flags
Title	Safety Management Systems- report of deficiencies
Reference	ISM Code, CONARINA Instruction

Safety Management System failures

The surveyor should prepare the report on deficiencies related to possible Safety Management System failures.

Category of deficiency:

- Technical
- Operational
- Documentation
- Other

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 firefighting and lifesaving appliances, oil pollution prevention equipment
- Leaks and oil in E/R spaces, pumprooms etc.

Deficiencies should not be reported, when:

- They are considered normal wear and tear for the ship type and age
- There is evidence that deficiencies are being dealt with adequately by the company including the personnel working onboard.

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

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prevention drills, etc.

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

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

REFERENCES:

- ISM Code

ATTACHMENTS: No

Kindest Regards,
CONARINA Technical Office

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