

Lotus Corporate Park, 05th Floor, "G" Wing, Unit – 501, 185/A, Graham Firth Compound, Goregaon East, Mumbai – 400063, India. Tel: +91 22 6863 1800, Email: <u>operations@maritectankers.com</u>; <u>ghse@maritectankers.com</u>

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PSC Focus: Most Common Deficiencies CY2023 (Safety Campaign: MTMPL/Safety/QHSE/04 of 2024)



During 2023, 'Fire Safety Code 07105 – Fire doors/openings in fire-resisting divisions' was the number one Deficiency Code (DC) that marked worldwide to all ship segments, involving 2.54% of the total deficiencies of world ocean going fleet (148,078).

In addition, this DC was found in 3,637 inspections, a 5% of the 77,124 inspections conducted during CY2023 while this code was responsible for 276 detentions (appeared as detainable deficiency).

This code was found:

- Only 1 time in 3,603 Inspections 99.07% of total PSCIs with this code as finding.
- 2 times in 34 Inspections 0.93% of total PSCIs with this code as finding.
- In 667 ports of the 1,576 ports of Global PSC Regime



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Considering that PSC Officers take into account all of the ship's systems to ensure enhanced safety, the deficiency profiles of the various ship segments are not the same. Bulk carriers, general cargo, tankers, LNG/LPG, and containers make up the majority of ship types. The analysis will exclude the other ship types (vehicle carriers, offshore, Ro Pax, etc.) because they make up a relatively small portion of the global fleet. The code 15150-ISM will not be taken into account because it is not considered as a stand-alone code.

As shown in Table 1, there are similarities and differences among the top 5 deficiency codes for different ship main segments. In particular:

- 1. Code 07105-Fire doors / openings in fire-resisting divisions is within top 5 in all segments (this is the most common deficiency code during CY2023). This code is a technical code. Most of the problems are related to maintenance, water tightness, rusted handles, doors blocked to open position without reason and other items. A good maintenance approach on board can reduce the findings to the minimum.
- 2. The second most common DC is 1110-Lifeboats, an item that causes a lot of issues on board. Lifeboats have a series of items involved, from technical issues (water tightness, engine, provisions, inventory etc) to operational (launching, testing, marking, drills etc). Lifeboats should always be in excellent condition because they are the primary abandon ship/rescue means on board.
- 3. The third issue, common to 3 out of 5 segments, is 04103 Emergency, lighting, batteries and switches. This is one of the most unpredictable items. A thorough maintenance plan and a productive inspection schedule, however, can keep the crew updated on issues.
- 4. Auxiliary Engines (code: 13102) also seems to be an issue during PSCIs of CY2023 as it was highly ranked in most segments.

Apart from simple deficiencies, there were 422 deficiency codes responsible for 12,030 detainable deficiencies leading to 2,378 detentions, during CY2023. The most common detainable deficiency code was 11101-Lifeboats (responsible for 319 detentions). Again, the code 15150-ISM is excluded from the review (it was marked as detainable 719 times).

According to Table 2, '1101- Lifeboats' code is prevalent to most ship main segments. Other items are technical within the Deficiency Area of Fire Safety, most probably due to the CIC on Fire Safety conducted in several PSC MoUs during the period from 1st September to 30th November 2023.



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Segment	Top Def Code #1	Top Def Code #2	Top Def Code #3	Top Def Code #4	Top Def Code #5
Bulk Carriers	11101 – Lifeboats	07105-Fire doors /openings in fire-resisting divisions	04103- Emergency , lighting, batteries & switches	13102 - Auxiliary engine	07110- Firefighting equipment and appliances
General Cargo	07105- Fire doors / openings in fire- resisting divisions	04103- Emergency, lighting, batteries and switches	07110- Firefighting equipment and appliances	13102 - Auxiliary engine	11101- Lifeboats
Tankers	07105- Fire doors / openings in fire- resisting divisions	11101- Lifeboats	10109- Lights, shapes, sound- signals	04103- Emergency, lighting, batteries and switches	07110- Firefighting equipment and appliances
LNG	07105- Fire doors / openings in fire- resisting divisions	11101- Lifeboats	07109- Fixed fire extinguishi ng installation	10109- Lights, shapes, sound- signals	03108- Ventilators, air pipes, casings
LPG	11101- Lifeboats	07105-Fire doors / openings in fire-resisting divisions	03108- Ventilators, air pipes, casings	07109-Fixed fire extinguishing installation	12107-Fire protection cargo deck area
Containers	13102- Auxiliary engine	11101- Lifeboats	04103- Emergency , lighting, batteries and switches	07105-Fire doors / openings in fire-resisting divisions	10109- Lights, shapes, sound- signals

Table 1 / source: RISK4SEA



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Segment	Top Def Code #1	Top Def Code #2	Top Def Code #3	Top Def Code #4	Top Def Code #5
Bulk Carriers	11101 – Lifeboats	03108- Ventilators, airpipes, casings	07113-Fire pumps and its pipes	07109-Fixed fire extinguishing installation	07105- Fire doors / openings in fire- resisting divisions)
General Cargo	07106-Fire detection and alarm system	07105-Fire doors / openings in fire- resisting divisions)	11104- Rescue boats	11101- Lifeboats	10111- Charts
Tankers	11101- Lifeboats	07109- Fixed fire extinguishi ng installation	03108- Ventilators, air pipes, casings	07115-Fire- dampers	07106- Fire detection and alarm system
LNG	03108- Ventilators, air pipes, casings	11104- Rescue boats	07101-Fire prevention structural integrity	07105-Fire doors / openings in fire-resisting divisions)	12107- Fire protection cargo deck area
LPG	03108- Ventilators, air pipes, casings	12107-Fire protection cargo deck area	11101- Lifeboats	07109-Fixed fire extinguishing installation	07113- Fire pumps and its pipes
Containers	07109- Fixed fire extinguishi ng installation	13102- Auxiliary engine	07115- Fire- dampers	07106-Fire detection and alarm system	07105- Fire doors / openings in fire- resisting divisions

Table 2 / source: RISK4SEA



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How to avoid deficiencies and detentions

It is very difficult to predict deficiency codes without good analytics and feedback. From a total of 587 different deficiency codes available to PSCOs in the CY2023, a number of 568 was used at least once. The 422 of them were marked as detainable at least once. Consequently, attempting to identify a pattern through generic preparation checklists derived from global statistics and standard codes will prove ineffective for every port or MoU.

The key question remains: How can a ship manager or operator properly prepare vessels to avoid failures and detentions? Without sound analytics and feedback, predicting deficiency codes is exceedingly challenging.

The best way to get ready for any future ship inspection is to be prepared for each port separately.

This can be done by conducting a risk assessment that considers the history of the port deficiency profile for the particular ship segment and the ship and management PSC history. A combination of these items can provide operators and ship managers with a Ship/Port/Manager specific checklist including priorities and applicable codes, to be prepared based on accurate statistical analysis.

Please discuss this campaign with all shipboard staff, carry out checks as per above highlighted items and confirm all are maintained in good working condition. Prepare one report to this effect and upload a copy along with your acknowledgement on JOT.

Look forward to receiving your active participation in this campaign.

Regards,

QHSE Team

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