

No.17 ~~Reporting by Surveyors of Deficiencies relating to Possible Safety Management System Failures~~
(Rev.0
July 2009)
(Rev.1
Sept 2016)

Reporting on deficiencies possibly affecting the implementation of the ISM Code on board during surveys

INTRODUCTION

~~The purpose of this Procedural Requirement is to ensure that the Organisation responsible for the issue of a SMC is notified when deficiencies relating to possible safety management system failures are identified by a surveyor.~~

The purpose of this Procedural Requirement is to ensure that the Organisation responsible for the SMS audit of the ship is notified when deficiencies that may affect the proper implementation of the safety management system are identified by a surveyor.

1. SCOPE AND APPLICATION

1.1 This document describes the procedure for reporting on deficiencies possibly affecting the implementation of the ISM Code on board during class and statutory surveys by surveyors of deficiencies relating to possible safety management system failures and the subsequent action to be taken.

1.2 This procedure applies to all cases of Classification Societies' involvement in classing the ship and/or being responsible for the SMS audit of the ship in issuing the SMC.

2. DEFINITIONS

2.1 "International Safety Management (ISM) Code" means the International Management Code for the Safe Operation of Ships and for Pollution Prevention.

2.2 "Document of Compliance" (DOC) means a document issued to a Company that complies with the requirements of the ISM Code.

2.3 "Safety Management Certificate" (SMC) means a document issued to a ship which signifies that the company and its shipboard management operate in accordance with the approved safety management system.

Note:

1. This Procedural Requirement applies from 1 July 2009.
2. Rev.1 of this Procedural Requirement applies from 1 Jan 2017.

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2.4 “Safety Management System” (SMS) means a structured and documented system enabling Company personnel to implement effectively the company’s safety and environmental protection policy.

2.5 “Deficiency” means a defect in, or a failure in the operation of the ship, a part of the ship’s structure or its machinery, equipment, fittings, or a failure in the documentation, possibly arising from the lack of implementation of the ISM Code on board.

2.6 “Report” means the documentation completed by the surveyor containing as a minimum the information shown in Annex 1. The report may be in any format decided by the Classification Society.

3. WHEN TO COMPLETE THE REPORT

3.1 When deficiencies possibly affecting the implementation of the ISM Code on board ~~relating to possible safety management system failures~~ are identified by the ~~Surveyor~~ surveyor during a periodical (Annual/Intermediate/Special) Class Survey or occasional Class Survey, Statutory Surveys, additional surveys relevant to Port State Control, Flag State Inspections or any other occasion, a Report is to be completed by the surveyor ~~Surveyor~~.

3.2 The Classification Society shall internally document implementation of PR17, regardless if deficiencies have been found (for example “Deficiencies reported under PR17: Yes/No”).

4. WHAT TO REPORT

4.1 The following shall be reported by the surveyor:

- 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 relating to deviation from operational requirements;
- iii) deficiencies relating to deviation from requirements for documentation and reporting;
- iv) other deficiencies which may seriously affect the safety of ship, personnel or the environment.

See Annex 2 for examples.

4.2 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.

4.3 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 organisation 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) an auditor from the organisation, 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.

4.42 The surveyor must inform the master or Company representative that this information may be communicated to the Organisation responsible for the ~~issue of the SMC~~ SMS audit of the ship as specified in the Continuous Synopsis Record.

5. REPORTING AND FOLLOW UP

5.1 The report shall be submitted to the responsible department within the surveyor's ~~Classification Society society~~ for review. The responsible department should finally judge whether the reported deficiencies are possibly affecting the implementation of the ISM Code on board related to SMS failures.

5.2 When the responsible department within the surveyor's ~~Classification Society society~~ judges that the reported deficiencies are not affecting the implementation of the ISM Code on board, related to possible SMS failures the report is to be filed.

5.3 When the responsible department within the surveyor's ~~Classification Society society~~ judges that the reported deficiencies are affecting the implementation of the ISM Code on board, related to possible SMS failures the report shall be sent to either:

- a. the Classification Society acting as a Recognized Organisation that has issued the SMC is responsible for the SMS audit of the ship as specified in the Continuous Synopsis Record., if the The contact details can be found on the IACS website:

www.iacs.org.uk, located under:

- PR17 Contact Details, or

- b. the ~~flag~~ Flag Administration, if the SMS SMC is issued was audited by the flag Flag Administration or an organisation other than a Classification Society acting as a Recognized Organisation in 5.3a.

5.4 The Classification Society acting as a Recognized Organisation that has issued the SMC has audited the ship for the issuance of the SMC shall review the report, and decide on what action, if any, should be taken.

No.17 **Annex 1 - Minimum contents of the Report on deficiencies possibly affecting the implementation of the ISM Code on board ~~related to possible Safety Management System failures~~**
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The report shall bear the have a title, “~~Safety Management System failure according to IACS PR 17~~”

1. Identification of ship:
 - IMO number
 - Ship's name
 - Flag
2. Identification of Survey/Attendance
3. Identification of SMC and DOC issuer:
 - Issuer of the SMC Organisation responsible for the SMS audit of the ship as specified in the Continuous Synopsis Record
 - Issuer of the DOC
4. Category of deficiency ~~Deficiency~~:
 - Technical
 - Operational
 - Documentation
 - Other
5. Details of deficiency

No.17 Annex 2 - Guidance for what to report

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Category of deficiency	Examples
Technical deficiencies	<ul style="list-style-type: none"> • Combination of deficiencies, that together indicates that the maintenance system is not effectively implemented. • Poor condition of hull, main deck, closing appliances, railings, ladders. • <u>Defective/missing</u> Defective / missing fire fighting and life saving appliances, oil pollution prevention equipment. • Leaks and oil in E/R spaces, pump-rooms etc. • <u>Deficiencies relating to technical conditions which may lead to the limitation, suspension or withdrawal of a Class or Statutory Certificate.</u> <p>Deficiencies should not be reported, when:</p> <ul style="list-style-type: none"> • they are considered normal wear and tear for the ship type and age and • there is evidence that deficiencies are being dealt with adequately by the Company including the personnel working on board.
<u>Operational deficiencies</u>	<ul style="list-style-type: none"> • <u>Accidents and hazardous occurrences not reported to the Company.</u> • <u>Crew not able to satisfactorily conduct practical demonstrations of shipboard operations, such as starting the fire pump, emergency generator, lifeboat engine, etc.</u> • <u>Crew not able to communicate effectively in the execution of their duties.</u> • <u>Inability of crew to perform satisfactorily mandatory drills such as fire drills, LSA drills, pollution prevention drills, etc.</u>
Documentation deficiencies	<ul style="list-style-type: none"> • 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 <u>name/address</u> on DOC and SMC). • Entries for relevant drills etc. in Log Book not completed in accordance with mandatory requirements. • Incorrect or missing entries in the Oil Record Book. • Fire Plan not up to date.
Operational deficiencies	<ul style="list-style-type: none"> • 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.

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Category of deficiency	Examples
	<ul style="list-style-type: none">▪ Inability of crew to perform satisfactorily mandatory drills such as fire drills, LSA drills, pollution prevention drills, etc.
Other deficiencies	<ul style="list-style-type: none">• 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 <u>Port State or Flag State detentions if no evidence available, that the organisation responsible for the SMS audit of the ship as specified in the Continuous Synopsis Record has been notified.</u>

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