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CIRCULAR Alert on detainable deficiencies

Following a recent Port State Control (PSC) inspection, a number of deficiencies have been imposed that resulted in the detention of the vessel. Dromon wishes to draw attention to those detainable deficiencies to avoid re-occurrence.

Notice to: Ship Owners/ Managers/ Operators | Surveyors/Auditors

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Emergency lighting, batteries and switches

During the PSC inspection, three deficiencies have been raised concerning this subject. These are:

- a. Steering Gear room emergency exit without any emergency light;
- b. There is no emergency light at the F.E. stations on board; and
- c. There is no emergency light at the muster station.

SOLAS Regulation III/11.5 states that **alleyways, stairways and exits giving access to the muster and embarkation stations shall be lighted**. Such lighting shall be capable of being supplied by the emergency source of electrical power required by SOLAS Regulation II-1/42 or II-1/43, as appropriate.

In addition to and as part of the markings required under SOLAS Regulation II-2/13.3.2.5.1, routes to muster stations shall be indicated with the muster station symbol, intended for that purpose.

Launching arrangements for survival craft

Another deficiency imposed was that two deficiencies have been raised concerning this subject. These are:

- a. Davit launching system for liferaft found inoperative with no lifting hook fitted; and
- b. Davit launching system for liferaft SWL 1500 kg. Davit SWL not adequate for L/R provided on board for 25 persons.

SOLAS Regulation III/20 states that the davit-launched liferaft automatic release hooks shall be:

- subject to a thorough examination and operational test during the annual surveys required by regulations I/7 and I/8; and
- operationally tested under a load of 1.1 times the total mass of the liferaft when loaded with its full complement of persons and equipment whenever the automatic release hook is overhauled. Such overhauling and operational test shall be carried out at least once every five years.

In addition to the above, the crew on board should follow the requirements of IMO Resolution [MSC.402\(96\)](#) for further weekly, monthly, annually and five-year thorough examinations of the launching arrangements that shall be conducted by either an authorized service providers, or by shipboard personnel under the direction of a senior ship's officer in accordance with the maintenance manual and/or the manufacturer.

The setting and maintenance of release gear are critical operations with regard to maintaining the safe operation of lifeboats, including free-fall lifeboats, rescue boats, fast rescue boats and davit launched liferafts.

Operation of Life Saving Appliances

Throughout the PSC Inspection, it was noted that the crew was not familiar with operation of launching arrangements for rescue boat and STB liferaft davit. There were two different freeboard/plimsol marks on the sides of the ship's hull.

The crew on board should take into consideration the below:

- maintenance and inspections must be carried out by a competent person to procedures that reflect the manufacturers' instructions;
- maintenance and inspections must be recorded to provide objective evidence that these have been carried out according to manufacturer's instructions;
- the quality of crew training and familiarization are directly affected by the frequency and quality of the drills carried out;
- planning is essential to ensure drills are performed safely;
- drills should be realistic but must not be hurried when familiarization or other training is taking place;
- a crew debrief after each drill is essential to emphasize lessons learned or to give additional training where necessary

The drills are considered fundamental for the crew familiarization and must be carefully planned to take into account the voyage requirements, loading and unloading operations, weather conditions etc. in order to identify the most suitable opportunity for an alert crew to carry out the drill.

The guidelines contained in IMO Circular [MSC/Circ.1206](#) should be brought to the attention of ship's crew, where applicable and used, where allowed for in SOLAS, to ensure crew familiarization.

Act now

Surveyors must take note on the above detainable deficiencies and give special attention during forthcoming class and statutory surveys, irrespective of scope.

Shipowners / Managers / Operators are kindly requested to pay special attention into these deficiencies, note the regulation's requirements and to inform Masters on taking corrective actions, if necessary.

The crew should be reminded on the testing and maintenance of the fire detection and fire alarm system requirements. Dromon [Publication](#) on onboard maintenance and drills agenda, should be followed enabling the crew to comply with the regulations

For further assistance please contact DBS Head Office at marine@dromon.com