

PSC Inspection Regime

Annual PSC Report 2019

April 2020

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INTRODUCTION

Dromon Bureau of Shipping (DromonClass) focuses on the goal of being a global player and stand out in the Maritime industry among other Classification Societies.

This goal leads to a continues and tremendous effort to tackle the forthcoming and demanding regulatory challenges. By using reliability, critical tools and methodologies, DromonClass identify best practices for ship operations and operational efficiency.

To assist each ISM Manager and Operator to improve operational efficiency, DromonClass provides a wide range of tools and services, including the preparation of the vessel for Port State Control Inspections, which results in an increase in the number ships under DromonClass and to the decrease of detention ratio over the last years.

In regard to the vessels that DromonClass performed Class and Statutory surveys/ audits, it has been noticed that 2019 follow a significant growth and more specifically a growth of 20.6%. The increase on the number of ships resulted the increase of inspections and simultaneously the number of deficiencies onboard DromonClass fleet.



Nevertheless, the total detention ratio in Paris, Mediterranean, Black Sea, Tokyo and Indian-Ocean MoUs have been reduced to 8.6%, as shown in the below pie chart.



SUMMARY OF DETAINABLE DEFICIENCIES

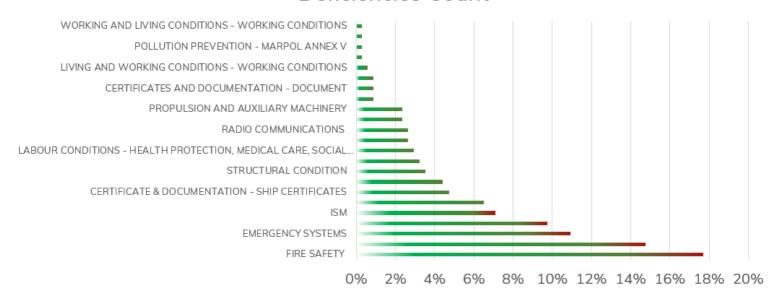
DromonClass Marine Division analyses the Port State Control inspections and every defective item is objective and vital for deepest investigation.

All vessels' data sources have been extensively examined, in order to obtain adequate information, that assist in identifying important and critical parameters based on their frequency and areas to be monitored in order to eliminate detentions.

The bar graph below shows the percentage of detainable deficiencies as per their area, imposed on board DromonClass fleet.

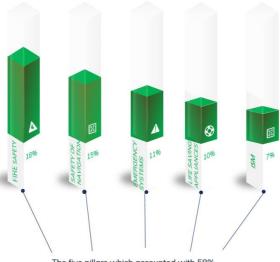
During 2019, as in the previous years, **Fire Safety** reached the peak with 18% and thus, being the area with the most detainable deficiencies.

Deficiencies Count



In general, it is stated that the pillars with most detainable deficiencies are related to: **Emergency Systems, Fire Safety, Life Saving Appliances** and **Safety of Navigation**, counted to 60%.

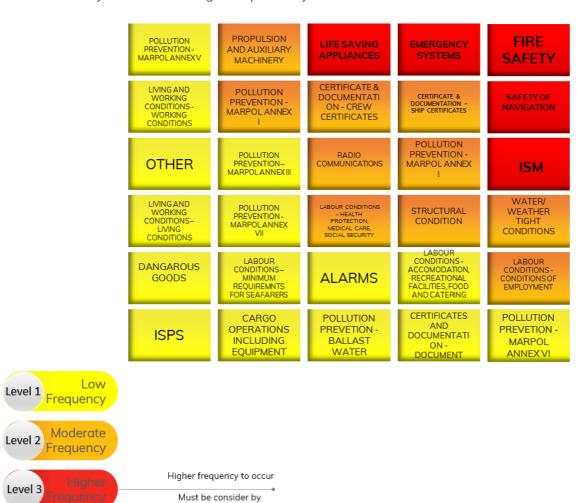
Starting from 2017 and ending in 2019, the sum of all five areas has dropped by 2%, meaning that DromonClass has efficiently tackle and focus on the defective items which were identified within the previous years.



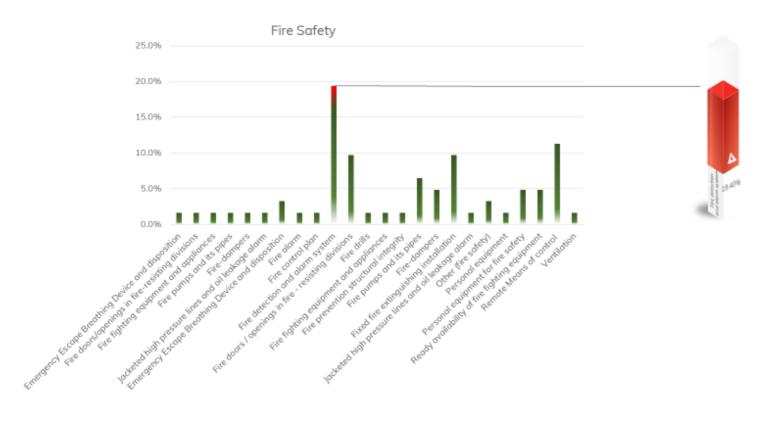
The five pillars which accounted with 58%

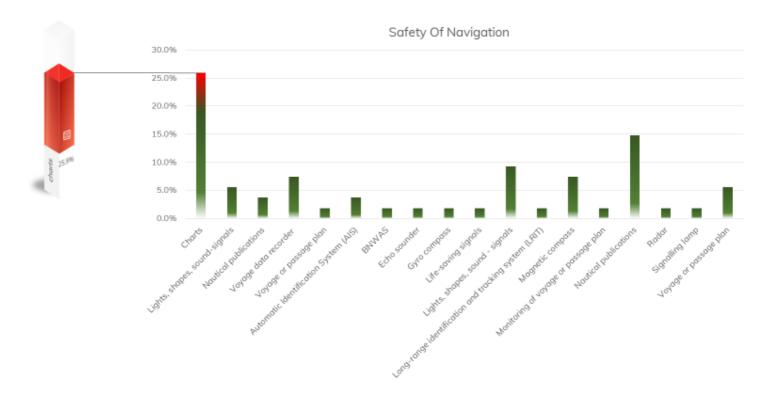
A matrix has been developed based on the frequency of the deficiencies as it is depicted on the below figure.

As shown, the most likely detainable deficiencies are related to the five above-mentioned areas, which can be considered very critical in respect to the vessel's detention. Below table illustrates the areas of detainable deficiencies that occurred on board with low and moderate frequency and are colored with yellow and orange, respectively.

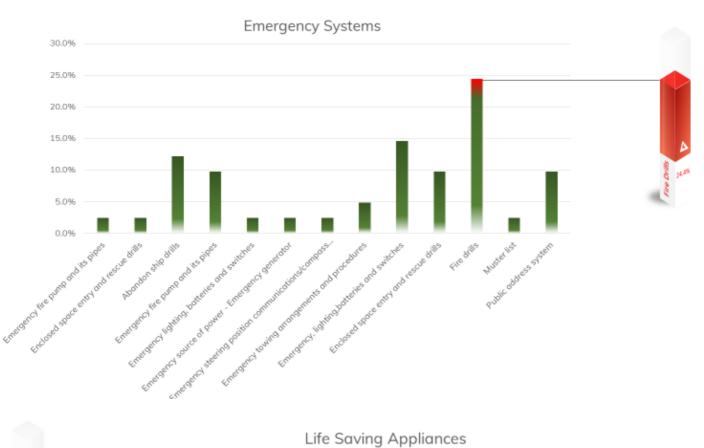


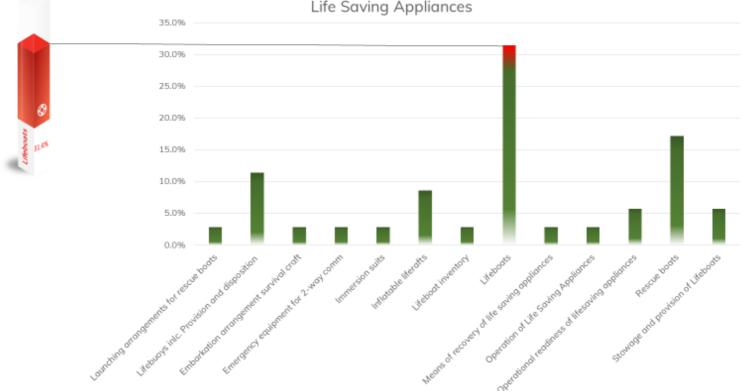
operators/managers (more than 5%) On further analysis, the bar chart below demonstrates the utmost imposed deficiencies in respect to their area. As shown, the fire detection and alarm system are dominated by the defective items related to Fire Safety. As regards the Safety of Navigation, charts weight at 26%.





Moreover, the lifeboat was a significant defective item among others under the Life Saving Appliances area, with a percentage under 30%. Finally, as shown in the below graph the emergency systems are dominated by fire drills with a percentage over 24%.





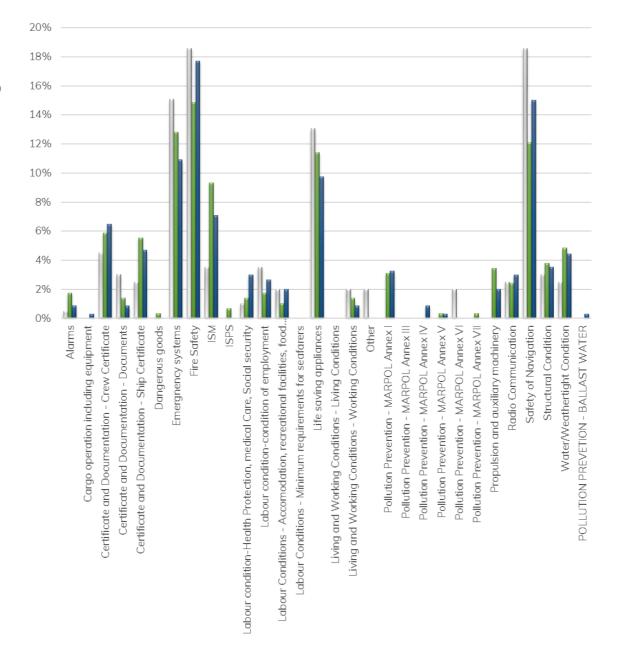
COMPARISON OF PSC INSPECTION OUTCOMES

DromonClass optimize the outcome of decisions that is based on the effort and focus on analyze of the data, since our Organization devotes significant time to minimize the occurrence of the detainable deficiencies and implement innovative solutions.

The bar chart below, illustrates the detainable deficiencies recorded on onboard inspections by Paris, Black Sea, Mediterranean and Tokyo MOU from 2017 to 2019.

2017-2019 STATISTICAL

2017 ■2018 ■2019



The proper planning and preparation for PSC Inspections, the organized inspections on board DromonClass fleet, and the use of data lead to a reduction on detainable deficiencies.

There has been a steady improvement over the last three years, having the detention ration at the lowest level. Therefore, a general downward trend for 2019 has been noticed.

In 2019, Safety of Navigation counted a percentage of 15% which seems that remains relatively at the same margins of 2018, while there is a substantial decrease compared to 2017.

Total deficiencies recorded in Life Saving Appliances were 33 out of total 339 defective items. Thus, we notice a decrease from 13% and 11% in 2017 and 2018 respectively, to 9.7% in 2019.

It is worth to mention, that the number of deficiencies in the following areas were declined:

Area	Weight %	2019(-%)
	4.07	40/
ALARMS	1%	-1%
CERTIFICATE & DOCUMENTATION - SHIP CERTIFICATES	5%	-1%
EMERGENCY SYSTEMS	11%	-2%
ISM	7%	-2%
ISPS	0%	-1%
LIFE SAVING APPLIANCES	10%	-2%
PROPULSION AND AUXILIARY MACHINERY	2%	-1%
WATER/WEATHERTIGHT CONDITIONS	4%	-1%

DROMON CIC ON CREW CERTIFICATES

The detainable deficiencies set as critical based on the frequency and increase compared with 2018 are connected to the area of Certificate & Documentation – Crew Certificates.

This area is selected among the rest, with a weight of 6%, therefore actions will be taken and addressed within 2020. line with this, DromonClass Marine Division shall issue a Circular with the Concentrated Inspection Campaign (CIC) that shall take place from April to June 2020.

2020 CIC OF PARIS AND BLACK SEA MOUS

The Annual Report of Paris MoU refers that a CIC on Stability (General) will be conducted within 2020. DromonClass will inform all parties concern in due time on the requirements of this CIC and will provide further guidelines by releasing a Circular with a questionnaire.

For more information, please send an email to psc@dromon.com Copyright © 2020, Dromon Bureau of Shipping



PSC Inspection Checklist

Bridge the gap AUGUST 2018 The checklist should be used by the ship's crew prior to arrival into port. The categories of inspection included in this checklist have been identified by DBS Port and Flag State Inspections Department as items that lead DBS classed ships to detention.

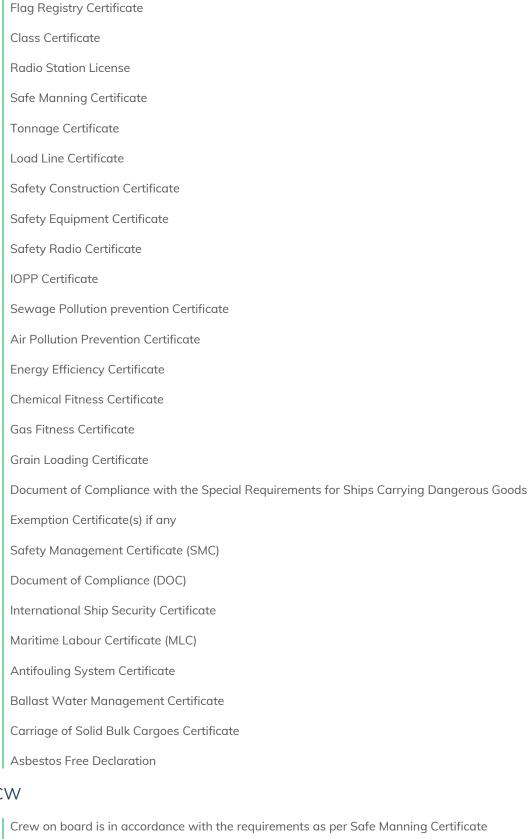
If any of the items outlined in this checklist are not in good working condition or found not incompliance, the crew should take appropriate steps for a corrective action to be implemented prior to arrival into port.

Please contact DBS Head Office through psc@dromon.com for further assistance.





Certificates & Documentation



STCW

Master, deck officers, engineer officers and ratings have a Certificate of competence available

Officers' license have endorsements by the Flag Administration as appropriate

Crewmembers have a valid medical examination Certificate

New crew members on board are familiar with their duties, responsibilities and the safety equipment

Rest hours documentation of the crew duly signed and readily available

Table of working hours is posted and is easily accessible

Seafarers have undergone security related familiarization training

Seafarers without designated security duties possess security awareness training

Seafarers with security duties possess security training

Hull

Ship's side shell plates without damage and excessive wastage (as far as visible)

Bulwarks, handrails and cat walks without signs of damage and excessive wastage

Cargo holds structure without damages and excessive wastage (e.g. bulkheads, frames, brackets, tank tops etc.)

Hatch cover arrangements including gaskets in good condition to close weathertight, without signs of wastage

All closing appliances in good working condition

Ventilators and air pipes including any closing appliances properly working without signs of damage or wastage and able to close air-tight

Closing devices of all sounding pipes properly working

Weather tight doors and small access hatches in good condition and close weathertight

Draft marks and Plimsoll marks painted in different colour

Plimsoll marks permanently marked on hull in accordance with the Load Line Certificate

Machinery and Pollution Prevention

Electric cable arrangements properly installed and insulated (no loosing wires)

Light covers properly fixed

Around the electrical main switchboard is provided an insulation mat

Engine room in clean condition

Main propulsion system is working properly

Auxiliary engine and power system including 100% power redundancy working properly

Emergency generator arrangement for immediate supply of electrical power working properly

Jacketed piping system on high pressure fuel lines properly installed and alarms working

Exhaust and vapour pipes properly insulated

Engine alarm arrangements working properly

All engines and piping systems free of leakage

Anchoring equipment in good condition

Mooring ropes in good condition

Oily water separation system in good working condition together with testing arrangements and the crew is familiar with the system and its use

15ppm alarm and stopping arrangements in good working condition

Piping arrangements in good condition (no signs of damage and/or corrosion)

Bilges and other machinery areas free of excessive oil

Oil record book is updated, entries are correct and periodically signed by the Master (codes used are correct and tanks listed as per IOPP Certificate)

Manuals for tankers, chemical tankers and gas carriers available on board

SOPEP available and approved onboard (includes updated communication data of Focal Point List as per IMO)

SMPEP available on board (for ships certified to carry Noxious Liquid substances in bulk) with updated Focal Point List

Garbage is collected and separated in closable bins as required and garbage record book entries are correct

Onboard readily available proof that while navigating in restricted areas low sulphur fuel is used

Crew is familiar with the sewage system and the treatment plan. Necessary drawings available on board.

Life Saving Appliances

Lifeboats with all parts in good condition without wastage, blocks and release mechanisms properly maintained and the crew is familiar with safe use of launching and release gear

Lifeboat inventory complete and in good condition with dates of expiration for pyrotechnics and foodstuff rations recorded and not outdated

Rescue boats complete and in proper condition with the inventory stored as required

Lifeboat/rescue boat engines in good working condition and starting easily

Life rafts and launching arrangements in good working condition and properly marked

Hydrostatic release for the rafts correctly connected and not outdated

Equipment for embarkation for additional life raft available (raft at the bow)

Launching arrangements for rescue boats and life rafts including limit switches in good condition and without wastage

Annual thorough examination of the launching appliances and on-load release gear has been carried out and relevant documentation available onboard

Embarkation ladders including their shackles and padeyes on deck in good condition

Wire falls of all launching/recovery arrangements in good condition and renewed as required

Lifebuoys (including reflective tape, correct ship's name/home port and lights with non-outdated batteries or smoke signals) available in sufficient amount and in good condition

"Heavy" lifebuoy (4.5kg) attached to the smoke/lightbuoy at bridge wings in a free fall arrangement

Lifejackets (including whistles plus lights and non-outdated batteries) found in good condition and sufficient amount as per Certificate. Additional lifejackets available on board

Line throwing appliances complete with expiration dates of the pyrotechnic units

Parachute distress signals available on board in sufficient quantities and in good condition with expiration dates not outdated, found on the bridge in an appropriate containment which is marked appropriately

Immersion suits (including lights and special attachments) available for all personnel onboard and stored in good condition. Additional suits available at remote working stations as required

Emergency illumination at all survival craft stations sufficiently working also illuminating the ship's side and the instructions posted

Lifeboat release and retrieval system comply with paragraphs 4.4.7.6.4 to 4.4.7.6.6 of the LSA Code, as amended by resolution MSC.320(89) and relevant documentary evidence can be found on board

Firefighting Appliances

Fire main piping and all hydrants in good condition without signs of corrosion or wastage and without soft patches. Also, couplings and valves free of leakages

Fire pumps including prime mover in engine room in good working condition and with sufficient delivery of water pressure

Emergency fire pump including prime mover in proper working condition with sufficient suction and delivered water pressure. Also, exhaust lines properly insulated.

Fire stations (including equipment of hoses, nozzles, spanners) in good condition. More specifically, nozzle spray adjustments workable and hoses without deterioration

Portable fire extinguishers available on board in good condition as per Fire & Safety Plan (due dates for required servicing recorded and not outdated)

Fireman's outfit available in required number and good condition (i.e. complete with helmet, clothes, lifeline, lamp and other required requisites)

Breathing apparatuses in good condition and ready to use with bottles including spare bottles filled

Fixed firefighting systems for engine room and cargo spaces in good working condition (e.g. filling status of gas bottles or foam tanks).

CO2 room properly locked and the key readily available

Fire detection arrangements properly working at all detection points

Fire extinguishing arrangement in paint locker as required in place and in proper working condition

Fire dampers and ventilation closing appliances (e.g. gaskets, handles, screws and other) in good working condition. Fire flaps inside trunks checked and closing properly.

Fire doors closing properly using their automatic closing devices and not fitted with hold-backs

Quick closing devices for tank shut-off and emergency stop of pumps and fans in good working condition

Emergency Escape Breathing Devices (EEBDs) available in required amount (plus additional training units) and distributed as per fire plan within superstructure and engine room and under full pressure

International shore connection including reduces piece with appropriate bolds and nuts available as per Fire & Safety plan

Navigation

Nautical publications including pilot books, list of lights, sailing directions, tide tables, code of signals, IAMSAR books used for the next voyage updated to the latest available amendments/corrections

Nautical charts to be used for the next intended voyage updated to the latest available Notice to Mariners (if applicable ECDIS system updated to latest amendments)

System for correcting all nautical publications on board has been developed

Passage plan from berth to berth available on board

Navigational instruments (e.g. radar, echo sounder etc.) in proper condition

Steering gear including rudder angle indicator as well as emergency steering gear including switch-over devices in good operating condition and the steering gear alarm functioning. Also, instructions for switch-over handling posted in vicinity

Daylight shapes in operational condition

Daylight signaling lamp and the independent power supply in good operational condition

Automatic position indicator (e.g. GPS) available on board and in good condition

Communication systems between bridge - engine room and bridge - steering gear room is provided and working properly

NAVTEX receiver in good working condition and spare paper is available

Echo sounder in good working condition

Magnetic steering compass in good working condition and properly visible from steering position. Spare magnetic compass (if provided) in good working condition. Lastly, updated calibration table available.

VDR (or S-VDR) installed correctly onboard and connected to respective devices.

AIS system installed and constantly switched on.

LRITS in good working condition and test documentation onboard as required.

Navigational equipment verified is as required in the Safety Record "Form E"

Radio Equipment

GMDSS transmitting and receiving equipment components including sources of energy in proper working condition

Radio operator assigned onboard is familiar with cancellation procedures for false distress alarms.

Radio log book is kept as required and includes records of tests

Portable VHF hand held radios for survival craft including batteries with spares/ re-charger are in good working condition.

Antenna systems without any signs of corrosion or damage

Radar Transponders in satisfying working condition and ready to be used in case of emergency. Also, they are serviced in accordance with manufacturer's requirements by shore service.

Freefall boat arrangement (if onboard) is fitted with one Radar transporter within the freefall lifeboat

EPIRB is correct and float free position. The life date of battery and hydrostatic release valid.

EPIRP test certificate readily available

Radio publications and manuals updated on board

Radio License on board valid

Reserve sources of energy (batteries) properly maintained and in working condition.

Safety

Working language of the ship established and recorded in the logbook

Updated fire & safety plans posted in accommodation alleyways clearly readable and show a sign of approval. One copy if the plan is stored in marked and weather tights container outside the accommodation area.

SOLAS training manuals available, with specific instructions for the appliances installed onboard and written in the working language.

Instruction manuals for onboard maintenance of life-saving appliances available and understood by all crew members. Regular maintenance has been recorded.

A plan or program of maintenance is readily available

Operating instructions for lifesaving appliances posted on scene and under emergency lighting. Instructions written in a language understood by all crew members.

Table of life saving signals poster on the bridge.

Drills for fire fighting, abandon ship, rescue boat operation and oil spill fighting have been carried out satisfactorily and the dates are recorded in the logbook.

Muster list is updated and written in the working language of the ship. Substitutes for key personnel are included and the muster list is posted on the bridge, in engine control room and accommodation spaces.

Paint materials stored inside the designated paint locker only

Escape ways accessible, free of obstructions and properly illuminated.

IMO symbols properly used for marking escape ways and locations of emergency equipment.

Pilot ladders and related boarding arrangements clean and in good condition.

Crew working on the bridge is familiar with the steering gear switch-over procedures and with the use of emergency steering device.

Key engine crew is familiar with emergency power arrangements.

Key persons for fire fighting are familiar with starting emergency fire pump.

Designated lifeboat/rescue boat crew is familiar with starting the engines.

Public alarm systems as for general alarm are working properly.

Engineer's alarm of unmanned machinery system is working properly.

ISM

Crew is familiar with the company's safety and environmental protection policy.

ISM manual is readily available on board.

All documentation available onboard is written in a language understood by the crew.

Senior ship officers can identify the "designated person".

Procedures and data are available and updated to establish contact with shore management.

Programs for drills and training have been set-up and recorded.

Familiarization records of new crew members are available onboard.

Master can show his overriding authority.

Non-conformities have been reported to the company and corrective actions have been taken by the company.

Maintenance routine and records are readily available onboard.

A copy of the DOC with the endorsement for the latest office audit is available onboard.

ISPS

Arrangements in place for controlling access to the ship for persons/goods boarding in the next port

Personnel responsible for controlling access to the ship is familiar with its duties

Arrangements are in place to secure and control restricted areas in port, as specified in the SSP

All entrances leading to restricted areas of the ship ready to be closed or secured

Security Equipment maintained and tested as specified in the SSP

MLC

Procedures have been implemented ensuring that no seafarer below the minimum age of 16 years is employed on the ship? (Refer to DMLC Part I for a higher minimum age).

All seafarers employed on board the ship have a valid training and competency certificates in accordance with flag State requirements (refer to DMLC Part I).

Records are kept on board for each seafarer engaged on board the ship that has successfully passed training in personal safety.

Evidence is found on board that in case a private recruitment and placement service provider is used for the recruitment of seafarers on board, this is approved under the requirements of the Convention.

In case a young seafarer is employed on board (i.e. less than 18 years of age) measures are in place that no night work in undertaken (for the definition of night refer to DMLC Part I).

In case a young seafarer is employed on board, measures are implemented that no tasks have been assigned likely to jeopardize his safety or health.

The ship is manned at least in accordance to the number and capacity stipulated on the Minimum Safe Manning Document.

The medical certificates of all seafarers onboard have been issued by an approved medical practitioner.

The medical certificates issued for seafarers over 18 years of age have maximum validity of two years.

The medical certificates issued for young seafarers have maximum validity of one year.

Medical certificates have been issued in English language in case the ship is engaged in international voyages.

The medical certificates include information on hearing, sight and color vision.

The validity of color vision does not exceed six years (unless otherwise specified by the flag State).

The medical certificates include a statement that the seafarer is fit for duties.

All seafarers on board have signed a Seafarers' Employment Agreement (SEA) with the shipowner and an original copy is provided to each seafarer.

The SEA and CBA is in English language in case the ship is engaged in international voyages.

The SEA signed between the seafarer and the shipowner includes all the requirements of Regulation 2.1, Standard A2.1.4 as well as national requirements of the flag State.

The SEA includes a clause for early termination of contract that should not be less than seven days.

The wages of each seafarer engaged on board the ship are paid in accordance with the SEA and CBA, as applicable.

Each seafarer is provided with monthly statement of account that includes the monthly wage, additional payments, deductions and applied exchange rates. The monthly account does not indicate any unauthorized

deductions.

The seafarer has a right to transfer all or part of his/her wage to an account nominated by the seafarer.

Charges for the remittance of the wages are reasonable in amount (refer to national requirements).

A table of shipboard working arrangements for all position on board the ship is posted in accessible place and is also in English language.

Hours of work and rest are available for each seafarer engaged on board the ship.

The hours of work and rest are signed by the Master (or a person authorized by the Master) and the seafarer.

The national requirements for the normal working hours and minimum rest hours (or maximum work hours) are followed (refer to DMLC Part I).

The muster and drills are carried out at times that minimize the disturbance of rest periods and fatigue.

Additional hours of rest for call outs during normal rest periods are provided to the seafarers.

Procedures have been implemented to allow hours of work that may be required in cases of emergency.

All seafarers engaged on board the ship have minimum annual leave with pay based on 2.5 days per month of employment (national requirements to be taken into consideration).

All seafarers engaged on board the ship are entitled to repatriation after a maximum 12 months period, in case of termination of the agreement for justified reasons or when they cannot carry out their duties on board due to illness, injury etc. (refer to the SEA that should state the provisions for repatriation).

All associated costs for repatriation are covered by the shipowner except in cases of serious default of the employment terms by the seafarer.

Copy of the Financial security for repatriation (Regulation 2.5) and Financial security relating to shipowner's liability (Regulation 4.2) can be found on board and is easily accessible to seafarers.

The Master (or person authorized by him) is carrying out inspections of the ship's accommodation and records are kept on board.

The accommodation spaces are clean and provided with proper lighting and sufficient drainage.

The mess rooms on board are clean, hygienic and equipped with tables and seats sufficient to accommodate the greatest number of crew.

Cabins are provided separate for each seafarer and for men and women.

Cabins are adequate size, properly equipped and facilitate tidiness and ensure reasonable comfort.

Heating and ventilation, including air conditioning, if fitted, is adequate and in good working condition.

Sanitary facilities are hygienic and reasonable standard of comfort are met.

The laundry facilities are adequate based on the number of seafarers employed on board and in good working condition.

The accommodation area has adequate natural and artificial light.

Recreational facilities are appropriate and in good condition as required by the flag State.

The galley is clean, hygienic and in good condition.

Spaces used for the storage of food are clean, hygienic and in good condition.

The ship is provided with sufficient amount of drinking water and food of nutritional value, quality and variety for the number of crew members on board.

Food is provided free of charge on board the ship for all seafarers.

The seafarer assigned a ship's cook is over 18 years of age, trained, qualified and food competent according to the requirements of the flag State.

For ships with less than 10 seafarers, the seafarers assigned for handling and processing food in the galley is adequately trained or instructed in areas including food and personal hygienic as well as handling and storage of food onboard.

All seafarers are provided free of charge with health protection and medical care (including essential dental care) relevant to their duties.

All seafarers engaged on board have the right to visit a qualified medical doctor or dentist ashore if this is requested or required.

The ship's hospital is clean and hygienic and used only for medical reasons (not as a cabin or storage area).

Medical publications are available on board as required by the flag State.

An up-today list of radio contacts where medical advice can be obtained is readily available on board (taking into consideration the most frequent ports of call).

The medical log and visit reports are kept up to date. A standard medical report form is used for both onshore and on board medical personnel as required by the flag State and the completed form is kept confidential.

The social security covers, as a minimum, medical care, sickness and injury benefits.

The applicable Occupational Health and Safety (OHS) policy, procedures and programmes have been implemented and comply with national and international regulations and relevant standards and guidelines.

The people assigned for implementing the OHS policies and procedures on board are clearly documented and familiar with their duties.

Risk assessments are carried out and measures have been implemented to prevent all identified risks that could result in accidents, injuries and diseases.

Accidents and incidents are investigated and reported to the flag State and records are available.

Safety committee meetings are held regularly, and minutes are available.

The ship is equipped with sufficient Personal Protective Equipment and all seafarers engaged on board are familiar with it.

Appropriate measures are in place to address OHS risks associated with fatigue, drug and alcohol use, smoking, asbestos, high and low temperatures, noise and vibration and infections.

Health and safety inspections and surveillance are carried out regularly and documented.

OHS risks associated with subcontractors working on board are addressed. All subcontractors working on board are subject to documented control procedures as required by the flag State.

All seafarers engaged on board the ship have access to shore-based welfare facilities.

A copy of the MLC, 2006 is available on board the ship.

A complaint procedure is implemented on board that shall neither penalize nor victimize the seafarer.

All seafarers on board the ship have a copy of the complaint procedure.

A complaints log in maintained on board.

The complaints are handled in a timely, fair and effective manner.

Contact details of the flag State authorities and names of nominated persons to trust on board are mentioned in the procedure.

Upcoming regulations

The oil residue (sludge) tanks must have no discharge connections to the bilge system, oily bilge water holding tank(s), tank top or oily water separators with the following two exceptions:

- Tanks may be fitted with drains (with manually operated self-closing valves and arrangements for subsequent visual monitoring of the settled water) that lead to an oily bilge water holding tank or bilge well or they may be fitted with an alternative arrangement, provided that this arrangement does not connect directly to the bilge piping system.
- The sludge tank discharge piping and bilge-water piping may be connected to a common discharge connection provided it does not allow for the transfer of sludge to the bilge system.

Applicable to all new and existing vessels with gross tonnage equal and above 400 GT. All ships, constructed before 1 January 2017 must be arranged to comply with the requirements no later than the first renewal IOPP survey carried out on or after 1 January 2017.

Refer to Dromon Circular C16024

A minimum of two two-way portable radiotelephone apparatus for each fire party for fire-fighter's communication shall be carried on board. Those two-way portable radiotelephone apparatus shall be of an explosion-proof type or intrinsically safe. Vessels constructed before 1 July 2014 shall comply not later than the first survey after 01/07/2018.

Refer to Dromon C17009

Vessels equipped with very high frequency (VHF) radiocommunication equipment must be updated by the first radio survey after 1 January 2017.

For vessels equipped with HF NBDP equipment must ensure it is HF direct-printing telegraphy compliant in time for the first safety radio survey after 01 January 2024.

Refer to Dromon C17012