



Office of
Deputy Commissioner
of Maritime Affairs

THE REPUBLIC OF LIBERIA LIBERIA MARITIME AUTHORITY

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TECHNICAL LETTER 2018-03 24 August 2018

Subject: Reporting on deficiencies possibly affecting the implementation of the ISM Code

To: Recognized Organizations

Ref: (a) IACS Procedural Requirement No. 17

Purpose: The purpose of this Notice is to provide guidance on reporting potential deficiencies that may affect the proper implementation of the safety management system (SMS) on Liberian flagged vessels.

Background: SMS related deficiencies continue to be reported by port State control inspectors. Instances of multiple uncorrected material deficiencies indicating a failure to implement a ship's SMS are the most common. Several SMS related detentions resulted due to the failure of the master and or crew to report nonconformities to the company in accordance with the SMS. ISM inspections are finding that maintenance logs do not accurately reflect the actual substandard condition of lifesaving and firefighting equipment. These cases have resulted in the ship's detention and the requirement for an external audit by the entity that issued the Safety Management Certificate.

Discussion: The Administration has established a system that collects flag and port State inspection and other data from several sources to enhance operational awareness of the Liberian flagged fleet performance and identify areas for improvement. As discussed at previous meetings with Recognized Organizations, the Administration intends to include data exchanged on deficiencies noted during surveys, using IACS Recommendation 75, and potential SMS deficiencies/failures identified by surveyors under IACS Procedural Requirement No. 17 (PR17). Currently the Administration is receiving reports of possible SMS failures after the responsible department

within the surveyor's Classification Society reviews and judges whether the reported deficiencies are possibly affecting the implementation of the ISM Code on board. The Administration is concerned that between the time the surveyor first identifies a possible ISM deficiency and the Administration is notified, the vessel may visit multiple ports and be subject to multiply port State control inspections. If there are multiple uncorrected material deficiencies, the vessel may be detained for failure to implement a ship's SMS.

It is essential that the Administration is informed as soon as the surveyor reports possible SMS related deficiencies to the surveyor's Classification Society. The Administration will review the information in the report together with other data on the vessel and vessel manager and may initiate preventive action, if deemed appropriate.

Action: Recognized Organizations shall report all deficiencies possibly affecting the implementation of the ISM Code on board Liberian flagged vessels that are identified by their

surveyors 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.

To reduce the administrative burden, the information may be reported as provided in PR 17 section 3.

Questions regarding this Notice should be directed to Safety Department at +1 703 790 3434 or safety@liscr.com

Sincerely,



Timothy M. Keegan
For, Deputy Commissioner Maritime Affairs
Republic of Liberia

