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## Alert on Detainable Deficiencies

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

Following recent Port State Control (PSC) inspections, deficiencies were recorded that resulted in the detention of the vessels. Dromon wishes to draw attention to those deficiencies considered as 'grounds for detention' to avoid recurrence.

These detainable deficiencies, all of which contributed to detentions, were:

### Water/Weathertight Condition

- The water ballast tank manhole gasket was aged and not weathertight
- The Forecastle weathertight door was warped and not weathertight when closed.
- Both side walls of cargo holds had several holes due to high-level corrosion.
- The engine workshop & CO2 room ventilators were found holed, damaged and cracked.

### Emergency Systems

- The emergency generator failed to start.
- The emergency fire pump main switch on the electrical switchboard could not provide a continuous working condition for the fire pump. There was an unauthorized pipe connection on the suction line.
- The emergency fire pump was not ready for use.
- The emergency fire pump could not be started.
- The PA System was not operative.
- The emergency fire pump pressure was insufficient, and the exhaust pipe insulation was damaged.
- The main deck fire line was holed in many places.
- The emergency diesel generator fuel tank level was low, and leakage was noted in the cooling water line.
- Some emergency lights on the bridge, accommodation and engine room were inoperative.
- Some external emergency lights at the rescue boat and firefighting stations were inoperative

## Cargo Operations, including equipment

- Cargo (used cars) not stowed and secured as per the Cargo Securing Manual

## Radio Communications

- 2 SART batteries had expired.
- The SART test certificate had expired.
- There was no record that the GMDSS weekly test had been carried out with a shore station.

## Fire Safety

- The local cargo hold fire detection system sensor could not be reset; the bridge panel displayed a fault alarm.
- The DO settling tank quick closing valve could not be closed.
- The main engine fuel oil double skin pipe sleeves were not secured.
- Doors to ECR, accommodation, crew mess room found not closing properly - deficient locking sets, latching seized and not engaging, closing mechanisms missing or detached.
- The CO2 leakage alarm was active on the engine room fire detection panel, indicating loss of pressure or system integrity. The system was not ready for immediate use.
- The fire detection panel was found in 'FAULT' status in the Engine Control Room. The ECR alarm could not be tested, and the system failed to respond. Operational readiness of the fire protection system had not been maintained.
- During the operational test of the fixed hold smoke detection system, the system failed to demonstrate effective operation. No. 3 cargo hold generated a 'fault' alarm during the test, preventing confirmation of its readiness. No. 2 cargo hold indicated a fire signal on the panel while indicating 'fault' status.
- The self-closing fire door of the electrical/battery room on the bridge was found blocked by a rope.
- The closed cargo spaces (other than Ro-Ro cargo space) intended for the carriage of motor vehicles had no loss of required ventilating capacity indicator on the bridge.
- Fire Integrity for all crew cabins on the upper deck was defective:
  - "A" Class fire door for the engine room on the upper deck was holed.
  - Insulation for "A" class bulkheads between the engine room and cargo hold was not provided near the cleaning water pump on the hold deck.
  - "A" class bulkheads of battery room penetrated for 220V electric cable - "B" class bulkheads of cabin penetrated for 220V electric cable.
- Sample extraction smoke detection system not working and with alarm "Emergency power supply".
- The flexible hoses of the fixed CO2 bottles had expired over a year ago.
- Two portable fire extinguishers in the accommodation were found empty.
- The cargo holds fixed fire extinguishing system CO2 lines were found broken and damaged.
- The engine room emergency exit and the galley self-closing fire doors were found in the open position, held back by hooks.
- The fire detection system was blocked on the bridge.
- Two fire doors were found blocked.
- The engine room entrance fire door was obstructed with a hold-back hook.
- Two fire doors were holed, and one fire door was not closed properly.
- The fire alarm was not working properly.
- Quick closing valves were not ready for use; the air reservoir tank was found empty.
- The diesel oil service tank's quick-closing valve was inoperative.
- The fire damper for the steering gear room was blocked by a washing pump and could not be closed.

## Alarms

- The oil mist detector alarm failed during testing.
- The visual fire alarm signal in the machinery space failed to operate during testing.
- The UMS alarm panel was not operative in the Chief Engineer's cabin.

## Safety of Navigation

- One radar was inoperative; under maintenance.

- One chart was missing.
- The ship's course and position fixes were not plotted on the paper charts; the ship was using unauthorized electronic charts.
- The voyage data recorder remote alarm unit had no signal from the bridge microphones.
- The VDR had three activated alarms, which could not be reset:
  - UTC lost (no connection to external time source).
  - LOST. DAU 10000222 (failure of the LAN connection to the Data Acquisition Unit).
  - DAU COM01 OPS LOST (lost connection with the COM01 port on the Data Acquisition Unit).
- Several navigational charts were found to be old editions.
- The last 6 voyage plans were not available onboard. The last voyage plan was from 4 months ago.
- Voyage charts were missing for the last voyage.
- The passage plan was not prepared on the charts.
- The S-VDR data acquisition unit battery had expired.
- The Bridge Navigational Watch Alarm System was inoperative when connected to the emergency power source.
- The fire detection and alarm system was inoperative when connected to the emergency power source.
- The echo sounder was inoperative.

### Life-saving Appliances

- The lifeboat engine failed to start with No.1 and No.2 batteries.
- The lifeboat was not ready for use. The batteries were discharged as a result of which the Engine could not be started.
- The MOB smoke signals had expired.
- The Lifteraft certificates were forged.
- The liferaft weak links were incorrectly installed.
- The rescue boat davit limit switch was missing.
- The LSA weekly checklists had not been completed for a long time, no records could be presented, and there were no entries in the bridge deck logbook.
- The davit-launched liferaft is not included in the supplement to the Cargo Ship Safety Equipment Certificate.
- The free-fall lifeboat launching davit was inoperative, and the limit switch was broken.
- The rescue boat engine was inoperative. The hanging shackle was heavily wasted. One propeller blade of the rescue boat was improperly maintained.
- The lifeboat engine could not be started.
- Annual liferaft inspection carried out by an unauthorized service provider company.
- There was a leak in the rescue boat's fuel pipe.
- The free-fall lifeboat searchlight was inoperative.
- The liferaft painter line was permanently secured to the vessel's structure instead of the hydrostatic release unit.

### Certificates & Documentation – Ship Certificates

- The Cargo Ship Safety Construction Certificate (including exemption) was invalid.
- The Cargo Ship Safety Radio Certificate (including exemption) was invalid.
- The ISM Document of Compliance had expired.
- The International Load Lines Certificate (including exemption) was invalid
- The International Oil Pollution Prevention (IOPP) Certificate was invalid.
- The International Sewage Pollution Prevention Certificate was invalid.
- The Cargo Ship Safety Equipment Certificate (including exemption) was invalid.
- The International Air Pollution Certificate was invalid.
- The Ballast Water Management Certificate was invalid. The Annual Survey had not been issued.

### ISPS

- There were no crew at the ISPS control point, cargo office room, or on the bridge deck.

## ISM

- The crew's familiarity with the emergency alarm systems, rescue boat, and CO2 system was poor.
- The crew were unable to demonstrate routine testing of the 15 ppm oil filter alarm.
- The Sewage treatment plant blower could not be operated.
- There were no records of testing the emergency generator with one of the battery sets.
- No enclosed space entry drill had been carried out for over 4 months.

## Pollution Prevention - Ballast Water

- The ballast treatment system was not working.
- There was a ballast water system alarm for the UV sensor value whilst discharging ballast in Port.
- The ballast water treatment system was malfunctioning.
  - There were several alarms on the ballast water treatment system, including: filter empty, maintenance required, defect sensor or cable break. A similar deficiency had been recorded on the last PSC report from the same MoU.

## MLC, 2006, Working and living conditions

- The multigas equipment was out of order: all gas values registered as zero.
- The engine room bilge was dirty and contained oily water.

## MLC, 2006 Conditions of employment

- There was no evidence of wage payments for several crew members from December and November 2025.

## MLC, 2006 Accommodation, recreational facilities, food and catering

- The accommodation heating, air conditioning and ventilation systems were inoperative.

## Act now

Surveyors / Auditors should take note of the above detainable deficiencies and pay special attention during forthcoming class and statutory surveys and audits, irrespective of scope.

Shipowners / Managers / Operators are requested to pay special attention to those deficiencies, note the Regulations' requirements, and ensure compliance with all Conventions / Codes and MSC / MEPC Circulars.