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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 vessel detentions. Dromon wishes to draw attention to those deficiencies considered as “grounds for detention” in order to avoid recurrence.

The following detainable deficiencies contributed to the detentions:

Water/Weathertight Condition – Load Line

- Ro-Ro cargo ramp corroded, dented and damaged, and unable to close properly. Watertight rubber sealing gasket damaged, resulting in improper sealing when closed.
- Vessel overload.
- Summer freeboard on the Load Line Certificate stated as 3938 mm, whereas the assigned value in the Stability Booklet was 4118 mm.
- Air escape pipes with corrosion holes on exposed deck: No. 2 BWT (P), 20 mm diameter; M/E FO Settling Tank, 10 mm diameter.
- Weathertightness at the forecastle not maintained: spurling pipe (P+) / chain pipe fractured and open at the joint with the forecastle deck; hawse pipe (P) with leakage marks at the joint; rope hatch unable to close due to deteriorated gasket.

Structural Conditions

- Cargo hatch covers and hatch coamings heavily corroded. External side support brackets/stiffening members holed and wasted.
- Many watertight doors, manhole covers and frames heavily corroded and thinned.
- Mooring winch foundations and supports heavily corroded, thinned and holed.
- Many deck ladders heavily corroded and holed.

- Hole observed in the forward shell plating inside the forepeak tank. Hole temporarily repaired with cement box and made watertight.
- Electrical equipment and penetrations modified without approval.
- Two holes observed in the port-side lifeboat positioning structure.
- Significant amount of water found under the electrical panel in the air-conditioning room.
- Port and starboard forward gangway/embarkation ladder heavily corroded and holed. Support members thinned and holed.

Emergency Systems

- General emergency alarm cannot be temporarily intercepted by the public address system.
- Emergency fire pump inoperative.
- During blackout test, emergency generator cooling fan was inoperative. Generator stopped during operation and could not maintain load. Emergency generator switch was in manual position instead of auto.
- Many emergency lights in engine room inoperative.
- Water ingress alarm system could not be demonstrated and was out of order.
- No. 3–4 cargo hold water ingress sensors wasted. Several main and pre-alarm indicators defective.
- Emergency fire pump pressure insufficient.
- Emergency generator inoperative.
- Most emergency lights outside accommodation unlit.
- Port-side liferaft outboard emergency light and foundation broken.
- Emergency alarm system continuously in emergency state. RO survey required.

Cargo Operations, including equipment

- Insufficient approved portable cargo securing devices available on board to properly secure cargo in accordance with the approved Cargo Securing Manual.
- Several fixed cargo securing fittings (elephant foot fittings) missing, rendering the cargo securing arrangement incomplete and unsuitable for securing cargo.
- Portable gas detector inoperative.

Radio Communications

- No acknowledgment received for MF/HF DSC test call during inspection. GMDSS logbook showed no acknowledgment received since at least 5 May 2026. Crew had reported repeated unsuccessful tests to the DPA and requested technical support, but no support was provided.
- EPIRB annual test report not available on board.
- SART annual test report not available on board.
- GMDSS battery annual capacity test report not available on board.
- Inmarsat-C distress alert unit in fault and inoperative.
- No acknowledgment received for test messages since April 2026, despite repeated tests to shore station.
- MF/HF ship-to-shore test could not be carried out.
- Antennas on monkey deck heavily corroded.

Fire Safety

- Fire alarm system requires maintenance. Power supply connections inside the box were not connected to the fire panel during the emergency generator test. Normally open position gave alarm.
- Emergency fire pump did not start after several attempts.
- Fire safety operations/booklets missing.
- Engine room fire detection system inoperative.
- Quick-closing valves not functioning when tested. Sections not clearly labelled.
- Port aft funnel flap could not be secured closed.
- Main engine fuel shut-off quick-closing valve inoperative during test.

- Some fire doors on Deck A not closing properly.
- Engine room oily and dirty.
- Many exhaust and steam pipe insulations in poor condition.
- Fire doors not closing properly.
- Diesel oil settling tank manhole found open.
- Excessive leakage observed from some fire nozzles.
- Many ventilation dampers, covers and frames heavily corroded and holed.
- Three fire dampers not working.
- Emergency fire pump did not start within 10 minutes. Fire hoses holed. Fire line leakage observed. Fire hydrant not closing properly.
- Fire call point in engine control room not working.
- Fire detector in engine control room not working.
- Oil observed on engine room platform near DO, HFO and ME LO tanks, creating a fire hazard.
- Emergency fire pump pressure insufficient.
- Both fireman's outfits had non-approved gloves, face and neck covers, lifelines, hand torches and helmets. No axe connection provided on the belts. BA apparatus leakage observed. Masks in poor condition.
- LO tank quick-closing valve not working.
- Some A-class fire doors fitted with hooks. Some fire doors not closing properly (galley and bridge).
- One EEBD in engine room missing. Only four EEBDs available on board, whereas the FCP requires five.
- One fireman's outfit in very poor condition. Last verification in 2018; boots and gloves damaged.
- Fire alarm panel not working.
- A-class fire doors locked in the open position.
- Fire door on officers' deck out of service; door handle and lock cylinder removed.
- Sanitary ventilation cover on poop deck broken.
- Fire alarm panel unable to indicate the fault alarm zone.
- Main fire line isolation valve faulty.
- A-60 class boundary between cargo space above and engine room below not provided at the bolted hatch (2400 × 2300 mm) and small hatch (1000 × 1000 mm).
- Some A-60 class bulkhead insulation in the engine room, battery room and air-conditioning room damaged or missing.
- Water leakage from the main fire line on port side deck.
- Main fire line holed amidships.

Alarms

- Main engine oil mist detector inoperative. Fault indication displayed on the oil mist detector panel in the engine control room.
- Bilge alarm in engine room not working.
- General emergency alarm not functioning.

Safety of Navigation

- Several voyage charts expired, including Nemrut Bay Chart BA 1618.
- Voyage plan for the last voyage missing.
- Nautical publication corrections not up to date since Week 25/2026.
- AIS annual test report not available on board.
- BNWAS first audible alarm in captain's cabin not working properly.
- Spare magnetic compass not presented.
- No. 1 radar insufficient, not receiving SART signals and image freezing. Both radars not connected to speed log. Transmitting times not recorded. No. 1 radar had an active MTR (Fan) alarm.
- VDR remote alarm unit not connected.
- Vessel did not respond on VHF Ch. 16 to Algeciras and Tarifa traffic. DSC was sent without acknowledgment or response while proceeding towards the congested entrance of Algeciras Bay.
- BA 1275 chart for Bartin was an old edition.

- Echo sounder not working and screen cracked.
- Long-Range Identification and Tracking (LRIT) system missing.
- Voyage plan not prepared berth-to-berth. Appropriate charts missing from voyage planning, including charts 2282/2213/2232/2233, etc. Restricted areas not identified.
- Deck logbook missing entries regarding departure/arrival procedures and information on activities carried out on board.
- Echo sounder not working and giving different incorrect readings.

Life-saving Appliances

- Liferaft HRU expired in March 2026, before the RO annual survey in May 2026.
- Inflatable rescue boat punctured, resulting in loss of air pressure, and engine inoperative.
- Both liferaft HRU expiry dates unreadable, and no HRU expiry date information stated on the certificate.
- FFLB davit control box on mooring deck appears secured with sealant and has a loose wiring gland. Hydraulic oil leakage observed on davit operating lines, with broken brackets. Outboard chocks missing and substituted with a frayed rope. Wooden blocks used for the arm to rest upon inboard. Lower boat lashing release wire not properly secured.
- Rescue boat davit limit switches for slewing and manual crank removal not working. Bolt missing from brake drum housing.
- Lifeboat interior lights inoperative. Position light broken and screws missing from windows.
- Lifeboat and rescue boat launching arrangements corroded; some parts cracked, holed and thinned.
- Port and starboard lifeboats not started within 5 minutes by deck crew. Port-side lifeboat steering tiller not working.
- First attempt to start starboard lifeboat engine failed. Engine started after 30 minutes of repairs on the second attempt.
- Lifeboat rudder damaged and corroded at connection point.
- Port and starboard liferaft painter lines not secured to HRUs.

Propulsion and auxiliary machinery

- Oil and water leakage observed from auxiliary engines (diesel generators).
- Water leakage observed from hydrophore and evaporator.
- Diesel oil separator inoperative.
- Many pump foundations heavily corroded; gauges broken and inoperative.
- Many valves and associated pipes heavily corroded in engine room.
- Main engine has heavy oil leakage.

Certificates & Documentation – Ship Certificates

- IHM Certificate under HKC missing at the time of inspection.
- Maritime Labour Convention Certificate invalid at the time of inspection; validity expired on 02/08/2026.
- SMC presented at inspection was titled “Provisional” and was not an interim certificate. It was issued based on a verification completed on 22/07/2026 following a flag change in February. The certificate was one page and did not match the standard format, with no space for endorsements.
- MLC Certificate presented at inspection was titled “Provisional” and was not an interim certificate. It was issued based on an inspection completed on 22/07/2026 following a flag change in February. The certificate was one page and did not match the standard format, with no space for endorsements.
- ISSC presented at inspection was titled “Provisional” and was not an interim certificate. It was issued based on an inspection completed on 22/07/2026 following a flag change in February. The certificate was one page and did not match the standard format, with no space for endorsements.
- CSR Nos. 10 and 11 could not be verified.
- Cargo Ship Safety Equipment Certificate expired.
- Cargo Ship Safety Construction Certificate expired.

Certificate & Documentation - Crew Certificates

- Chief Engineer's CoC expired on 20/06/2026. Flag State endorsement was also missing.

Certificate & Documentation – Documents

- Ship Energy Efficiency Management Plan (SEEMP) Part I missing.
- Main engine and D/G lubricating oil changes not recorded in the Oil Record Book.
- Oil Record Book not properly maintained.
- Deadweight values stated in the Stability Booklet approved by Qualitas Register of Shipping on 13/12/2025 did not match the values stated in the Safety Construction Certificate (20,730 MT in the booklet versus 21,218 MT in the certificate).
- HMI report indicates asbestos on board, but no monitoring and maintenance plan prepared. Identification labels not provided.

ISM

- Deficiencies marked as ISM are objective evidence of a failure or lack of effectiveness in the implementation of the ISM Code. Safety management audit by the Administration or RO is required before departure.
- Deficiencies marked as ISM are objective evidence of a serious failure or lack of effectiveness in the implementation of the ISM Code. Safety management audit by the Administration is required before departure.
- Corrective action on the ISM system by the Administration is required before departure. Deficiencies marked as ISM are objective evidence of a failure or lack of effectiveness in the implementation of the ISM Code.
- The SMS implemented on board failed to ensure safe operation and proper maintenance of the vessel, as evidenced by the deficiencies above.
- SMS did not ensure proper maintenance, as evidenced by the PSC deficiencies.
- Two fire drills conducted were unsatisfactory, with deficiencies that could result in fire-fighting personnel becoming casualties and failure to extinguish the fire or retrieve casualties.
- During galley fire drill, crew were unable to demonstrate/undertake their duties properly.
- Excessive time taken to attack the fire. Fire team did not match the muster list. Fire-proof VHF radio missing. Leakage from nozzle and hose.
- During drill, crew were not at their assigned lifeboats as per muster list. During port-side launching, the auto-release device did not allow the boat to be deployed safely, and the drill was stopped.
- Crew not prepared for abandon-ship drill.
- Crew performance during fire drill was unsatisfactory. Firefighter's air cylinder was not opened and a radio was out of order. At the end of the drill, the radio was verified to be working.
- According to the ship's log, on 08/06/2026 the ship was at sea, maintaining constant speed without stopping. However, the Exercise Report recorded an MOB drill with the rescue boat launched and manoeuvred on the water on the same date. This record appears inconsistent with the ship's log.

Pollution prevention - MARPOL Annex I

- Oil leakage observed from mooring winch pumps and pipes.
- Oil filtering equipment not working properly.
- Three-way valve operation or pump stopping could not be demonstrated.
- Starboard anchor emergency system inoperative. Port anchor had severe oil leakage, posing a risk of sea pollution. RO survey required.

Pollution prevention - MARPOL Annex VI

- Main and auxiliary engine NOx-related component change records not up to date. Last record dated 2019.

Pollution Prevention - Ballast Water

- BWMP not prepared according to D-2 standards and not approved on behalf of the current flag.
- BWTS inoperative, with several active alarms, including “maintenance required”, “general fault” and “end of cycle cleaning required”.
- Ballast water treatment system not working; alarm active.
- BWMP not updated to D-2 standards.
- Ballast water treatment system not used during the last ballast operation.

MLC, 2006, Working and living conditions

- Provisions quantity insufficient for 13 crew members.
- Bosun did not comply with the 6-hour rest period on 08/06/2026. Chief Engineer did not comply with the 6-hour rest period on 01/06/2026.

MLC, 2006 Conditions of employment

- Several crew members were paid less than the minimum wage scale defined by the applicable ITF CBA.
- No evidence that crew members had been paid monthly as required by the Convention. Seven crew members had signed off, and several reported non-payment of July wages and accrued wages.
- Non-payment of wages to crew members for more than 3 months.
- Several crew members found with SEAs not in accordance with the applicable CBA regarding basic wage and leave pay. One seafarer had an A/B contract but was employed and paid as an OS on board.
- None of the Seafarer Employment Agreements presented during the PSC inspection were valid. They were issued by an entity that was not the MLC shipowner and contained non-standard clauses, including irregular salary garnishing. The DMLC Part II states that the MLC model format should be used.
- Several crew members had been on board for more than 12 months.

MLC, 2006 Accommodation, recreational facilities, food and catering

- In several cabins, no cold water was available, toilets were not functioning properly, bed lights were not provided, washbasins were not connected in two cabins, and windows were not provided.

MLC, 2006 Health protection, medical care, social security

- At least six cans of paint found in the port-side passageway below the freeboard deck, creating a risk of toxic vapours due to lack of ventilation and a fire safety risk.
- Multi-gas detector inoperative.

Act now

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

Shipowners/ Managers/ Operators are requested to pay special attention to these deficiencies, take note of the applicable regulatory requirements, and ensure compliance with all applicable Conventions/ Codes and MSC/ MEPC Circulars.