

**Report of the 2021 Concentrated Inspection Campaign (CIC)  
on Stability in General**

## EXECUTIVE SUMMARY

From 1<sup>st</sup> September 2021 to 30<sup>th</sup> November 2021, the BS MoU carried out a Concentrated Inspection Campaign (CIC) on Stability in General throughout the region. This campaign involved all member States of the BS MoU to the Stability in General and was conducted in conjunction with the Tokyo MoU and the Paris MoU, and other PSC regimes. The campaign was conducted under the campaign coordination of the Romanian Naval Authority. Guidelines and Questionnaire of the Paris and Tokyo MoUs were used.

During the campaign, a total of 983 inspections were carried out with the CIC questionnaire involving 983 individual ships. During the CIC, 43 ships were detained totally. Of this quantity, 10 of the detentions are the result of inspections without CIC Questionnaires and none of these 33 ships were detained under the CIC scope.

A total of 61 questionnaires had at least one non-compliance to any of the requirements, resulting in 6.2 per cent of CIC inspections. The overall average per cent of non-conformities was 0.83 which means that the “unsatisfactory” answer was given to a question on 0.83 % of occasions.

The most unfavourable results are questions 7 and 8, which asked the master/loading officer to confirm that the “calculated” displacement and trim corresponds with the “observed” draughts (60.7%) and periodical verification on the accuracy of the stability instrument (37.7%).

A total of 364 (37.03%) CIC inspections concerned bulk carriers, followed by general cargo/multi-purpose with 314 (31.94%) inspections, oil tankers with 108 (10.99%) inspections and oil/chemical tankers with 82 (8.34%) inspections, which comprises 868 (88.3%) total CIC inspections. The majority of inspections with non-conformities observed were general cargo/multi-purpose ships with 31 inspections and Livestock carrier with 4.

Most inspections were carried out on board of ships flying the flags of Panama with 165 inspections (16.79%), Marshall Islands with 126 inspections (12.82%), Liberia with 121 inspections (12.31%) and Malta with 85 inspections (8.65%). A total of 41 flags covering 47.8% of the total CIC inspections had no non-conformities.

The situation worsened as the age of ships increased. The per-cent of total non-compliant CIC inspections is the highest for 35+ ships 13.74%. For ships 6-10 and 16-20 years old, the percentage of non-compliance is less than the others, respectively 0.07% and 0.09%.

Inspected ships not detained for CIC-related deficiencies comprise no CIC topic-related detentions. The CIC topic-related deficiencies were not considered serious enough to detain the ship.

# REPORT OF THE 2021 CONCENTRATED INSPECTION CAMPAIGN (CIC) ON STABILITY IN GENERAL

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# 1 INTRODUCTION

## 1.1 Purpose of the report

This report documents the results of the Concentrated Inspection Campaign (CIC) on Stability in General, which was carried out by BS MoU Member Authorities between September 1<sup>st</sup> and November 30<sup>th</sup>, 2021; which was conducted in conjunction with the Paris and Tokyo MoUs as well as other PSC Regimes.

## 1.2 Objective of the CIC

The objective of the Campaign on the Stability in General aimed at checking the level of compliance with the relevant Stability requirements of IMO Instruments within the shipping industry, create awareness amongst ships' crew and ship owners with regard to the importance of compliance with the provisions of Stability in General.

## 1.3 Scope of the CIC

The questionnaire for the CIC contains 8 questions and the campaign targeted 8 aspects to verify compliance provisions of Stability in General to assure that:

- .1 whether the ship has been provided with approved stability information understood by the Master and loading officer;
- .2 whether the correct stability data have been used or applied for the Stability calculation;
- .3 for evidence of ongoing compliance with stability criteria;
- .4 whether the Master and the officer in charge is familiar with the verification and calculation on ship's stability;
- .5 whether the stability instrument is approved by the Administration or RO and a document of approval for the stability instrument issued by the Administration, if applicable;
- .6 whether the type of stability software in use is relevant to the ship type;
- .7 the draught marks are marked clearly at the bow and the stern and the ship staff are verifying that the calculated displacement and trim corresponds with the actual observed draughts;
- .8 whether the stability instrument is accurate and reliable, if applicable.

## 1.4 General remarks

This report presents an analysis of the responses to the CIC Questionnaire submitted during the campaign period. Thereby, for the purpose of this report:

- *Inspection:* An inspection with a completed CIC Questionnaire with an applicable response (Except Table 1);
- *Non-compliant response:* a "NO" response to any of the questions 1-8 which indicates non-compliance to a requirement in the questionnaire;
- *CIC inspection with a non-compliant response:* Questionnaire with at least one "NO" response to any question 1-8;
- *Non-compliant response:* "NO" response to a question, indication non-compliance of a requirement;
- *CIC Detention:* CIC-topic related detention which is indicated by a "Detention" response to any question 1-6, which also coincides with recorded detentions; and
- *Total applicable responses:* Total number of "YES-Compliant" plus "NO-Non compliant" answers to the questions. i.e. "N/A" responses filtered out from the result.

## 2 SUMMARY, CONCLUSIONS AND RECOMMENDATIONS

### 2.1 Summary

During the campaign, a total of 983 inspections were carried out with the CIC questionnaire involving 983 individual ships. Only one CIC inspection has been carried out on board of an individual vessel.

The results of the CIC reveal that a total of 61 non-compliant and 43 CIC inspections with at least one non-compliant response are recorded as a direct result of this campaign on board of 983 individual vessels subjected to CIC inspections.

Analysis of the results of the CIC revealed the following:

- .1 A total of 43 questionnaires had at least one non-compliant response, which resulted in 4.37 per cent of CIC inspections not conforming to the requirements set out in the questionnaire. The overall average per cent of non-conformities was 0.83.
- .2 During the campaign, no ship is detained for CIC-related deficiencies which comprise that there are no CIC topic-related detentions.
- .3 A total of 364 (37.03%) CIC inspections concerned bulk carriers ships, followed by general cargo/multi-purpose with 314 (31.94%) inspections, oil tankers with 108 (10.99%) inspections and oil/chemical tankers with 82 (8.34%) inspections, which comprises 868 (88.3%) total CIC inspections.
- .4 Most inspections were carried out on board of ships flying the flags of Panama with 165 inspections (16.79%), Marshall Islands with 126 inspections (12.82%), Liberia with 121 inspections (12.31%) and Malta with 85 inspections (8.65%).
- .5 A total of 41 flags, covering 47.8% of the total CIC inspections, had no CIC topic non-conformities.
- .6 There are totally compliance results (100%) related to whether the ship has been provided with stability information approved by the Administration or Recognised Organisation acting on behalf of the Administration and the approved stability information can be understood by the Master and loading officer (Q1), whether the data is used in the stability check for departure complete and correct (Q2), whether the ship complies with the stability criteria as applicable to the ship type (Q3), whether there is evidence to show that the Master and the officer(s) responsible for cargo operations can determine the stability of the ship under varying conditions of service using the approved stability information provided on board (Q4), and whether the type of stability software in use meets the requirements for the relevant ship type (Q6).
- .7 The most unfavourable results are Questions 7 and 8 which asked for;  
Question 7 (*information purposes only*): Is there evidence on board to show that the master/loading officer confirms that the "calculated" displacement and trim corresponds with the "observed" draughts? (60.7%);  
Question 8 (*information purposes only*): Has the accuracy of the stability instrument been verified periodically by applying at least one approved test condition? (37.7%).
- .8 There is no non-compliance that might be considered detention.
- .9 By ship age, ships under 20 years reported the most favourable results, but the situation worsened as the age of ships increased.
- .10 Older ships, particularly those 30 years and older, are reported the least favourable results. They comprised 52.5% of the total non-compliant and accounted for 51.1% of total non-compliant CIC inspections.

- .11 Breakdown of major non-conformities as indicated by “NO” responses have been studied by ship flag and ship type and presented in **Section 3.6**

## 2.2 Conclusions

The most favourable results (100%) related to whether the ship has been provided with stability information approved by the Administration or Recognised Organisation acting on behalf of the Administration and the approved stability information can be understood by the Master and loading officer (Q1), whether the data is used in the stability check for departure complete and correct (Q2), whether the ship complies with the stability criteria as applicable to the ship type (Q3), whether there is evidence to show that the Master and the officer(s) responsible for cargo operations can determine the stability of the ship under varying conditions of service using the approved stability information provided on board (Q4), and whether the type of stability software in use meets the requirements for the relevant ship type (Q6).

Although there is no CIC topic related to detention, lack of evidence on board to show that the master/loading officer confirms that the “calculated” displacement and trim corresponds with the “observed” draughts (60.7%) and periodical verification on the accuracy of the stability instrument (37.7%) raise concerns.

## 2.3 Recommendations

During the campaign, it is observed that the inspected vessels have a great level of compliance with the specific provisions of the CIC on Stability in General, but there are also some non-compliances of the stability instruments in accordance with stability requirements.

Thereby, it is recommended that:

1. Basic findings of the report in general, analysis of the responses to the questionnaire and breakdown of major non-conformities by ship flag, ship type to be submitted IMO III Sub-Committee;
2. Master and crew familiarity with essential calculation on the actual stability condition of the ship on completion of cargo operations and before departure of the ship shipboard procedures;
3. Continue to put emphasis on the stability requirements of the IMO when performing PSC inspections, particularly the requirements that raised the most concern in the CIC on Stability in General; and
4. Particular attention should be brought to raise the awareness amongst ships’ crew i.e., the confirmation of the “calculated” displacement and trim corresponds with the “observed” draughts by Master/Loading Officer and the periodical verification of the accuracy of the stability instrument by applying at least one approved test condition.

## 3 ANALYSIS

### 3.1 General

The total number of ships inspected and the total number of inspections performed during the CIC are presented in Table 1.

**Table 1** Summary of inspections during the CIC

	No. of individual ships inspected during CIC	No. of inspections with a CIC questionnaire	No. of inspections without CIC questionnaire
Total	1107	983	159
Total number of detentions	43	33	10
Detentions with CIC-topic deficiencies	-	-	N/A

Looking at the number of inspections performed with a CIC questionnaire (Column 2 of Table 1), during the CIC campaign there is **NO** CIC-related detention. CIC topic Questionnaire submission rate was 88.8 per cent.

Table 1 also illustrates that all individual ships that were involved with this CIC underwent only one CIC inspection. Thereby, the number of individual ships inspected for CIC is not incorporated in the inspection and detention data presented in this report.

**Figure 1** Responses for each of the 8 questions compliance to the requirements

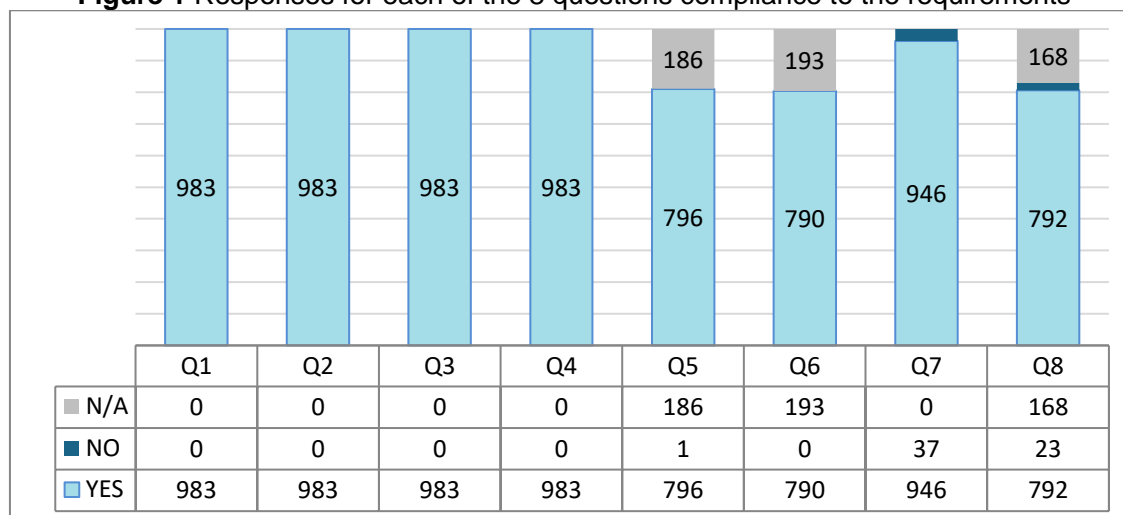


Table 2 presents the response to the questionnaire. In order to analyse results on an individual question basis, all Not Applicable (N/A) responses are filtered and total relevant/applicable responses comply with the requirement presented in the last column of Table 2.

**Table 2** Responses CIC Questionnaire on CIC on Stability in General \*

Nr.	Questions	YES Nr.	NO Nr.	Total Nr. of applicable responses	Detention Nr.	Compliance	
						YES %	NO %
1	Has the ship been provided with approved stability information which can be understood and easily used by the Master and loading officer?	983	0	983	0	100.00	0.00
2	Is the data used in the stability check for departure complete and correct?	983	0	983	0	100.00	0.00
3	Does the ship comply with the stability criteria as applicable to the ship type?	983	0	983	0	100.00	0.00
4	Is there evidence to show that the Master or responsible officer can determine the stability of the ship under varying conditions of service using the approved stability information provided on board?	983	0	983	0	100.00	0.00
5	If the ship is provided with a Stability Instrument, is it approved by the Administration?	796	1	797	0	99.87	0.13
6	If the ship is provided with a Stability Instrument, does the type of stability software in use meet the requirements for the relevant ship type?	790	0	790	0	100.00	0.00
7	[Is there evidence on board to show that the master/loading officer confirms that the “calculated” displacement and trim corresponds with the “observed” draughts?]	946	37	983		96.24	3.76
8	[If the ship is provided with a Stability Instrument, has the accuracy of the stability instrument been verified periodically by applying at least one approved test condition?]	792	23	815		97.18	2.82
	<b>TOTAL</b>	<b>7,256</b>	<b>61</b>	<b>7,317</b>	<b>0</b>	<b>99.17</b>	<b>0.83</b>

\* Includes Bulgaria and Romania data which are submitted also to the Paris MoU.  
Russian Federation and Turkey data includes only Black Sea ports.  
Questions 7 and 8 are for information purposes only.

It indicates that the requirements that reported the most favourable results (100%) related to whether the ship has been provided with stability information approved by the Administration or Recognised Organisation acting on behalf of the Administration and the approved stability information can be understood by the Master and loading officer (Q1), whether the data is used in the stability check for departure complete and correct (Q2), whether the ship complies with the stability criteria as applicable to the ship type (Q3), whether there is evidence to show that the Master and the officer(s) responsible for cargo operations can determine the stability of the ship under varying conditions of service using the approved stability information provided on board (Q4), and whether the type of stability software in use meets the requirements for the relevant ship type (Q6).

The CIC questionnaire indicates that an “unsatisfactory” answer was given to a question on 0.83% of occasions. It is the average per cent of unsatisfactory responses indicating overall compliance with the requirements. The number of “Detention” responses to the Questions coincides with the recorded CIC topic-related detentions as a result of an observed non-conformity (“NO” response) to any of the questions in the questionnaire.

Breakdown CIC inspections, inspections with non-conformities to the requirements set out in the questionnaire questions 1-8, average per-cent of non-conformities, number of unfavourable responses/non conformities and CIC topic related detentions by ship type, ship age, ship flag and ship risk profiles presented in **Section 3.2 - Section 3.5** of this report. The breakdown of the major non-conformities by ship flag, ship type and ship age is presented in **Section 3.6**.

### 3.2 Analyses by Ship types

A total of 364 (37.03%) CIC inspections concerned bulk carriers, followed by general cargo/multi-purpose with 314 (31.94%) inspections, oil tankers with 108 (10.99%) inspections and oil/chemical tankers with 82 (8.34%) inspections, which comprises 868 (88.3%) total CIC inspections.

The majority of inspections with non-conformities observed were general cargo/multi-purpose ships with 31 inspections and Livestock carriers with 4. Although they constituted only 3.56% of all CIC inspections they accounted for 78.7% of CIC-topic related non-conformities.

**Table 3** Results by ship types

Ship Type	Nr. of CIC inspections	Nr. of CIC inspection with non-compliant responses	% non-compliant CIC inspections	Total Nr.of applicable responses	Nr. of non-compliances	% of non-compliance	% total non-compliances	CIC topic related detentions
Bulk carrier	364	2	0.55	2,901	3	0.10	4.92	0
General cargo/multipurpose	314	31	9.87	2,051	42	2.05	68.85	0
Oil tanker	108	2	1.85	858	3	0.35	4.92	0
Oil /Chemical tanker	82	2	2.44	656	4	0.61	6.56	0
Container Ship	47	0	0.00	373	0	0.00	0.00	0
Chemical tanker	25	0	0.00	200	0	0.00	0.00	0
Ro-Ro cargo	15	0	0.00	84	0	0.00	0.00	0
Livestock carrier	7	4	57.14	37	6	16.22	9.84	0
Others	21	2	50.00	157	3	1.91	4.92	0
<b>TOTAL</b>	<b>983</b>	<b>43</b>	<b>4.37</b>	<b>7,317</b>	<b>61</b>	<b>0.83</b>	<b>100.00</b>	<b>0</b>

### 3.3 Analyses by ship age

By ship age, ships under 20 years reported the most favourable results but the situation worsened as the age of ships increased. The per-cent of total non-compliant CIC inspections is the highest for 35+ ships 13.74%. For ships 6-10 and 16-20 years old, the percentage of non-compliance is less than the



others, respectively 0.07% and 0.09%. The per-cent of total non-compliance for 11-15 years old is worse than 16-24 and even 30-34 years old. Results by ship age are presented in Table 4 below.

**Table 4** Results by ship age

Ship Age	Nr. of CIC inspections	Nr. of CIC inspection with non-compliant responses	% non-compliant CIC inspections	Total Nr. of applicable responses	Nr. of non-compliances	% of non-compliance	% total non-compliances	CIC topic related detentions
0-5	80	1	1.25	640	2	0.31	3.28	0
6-10	179	1	0.56	1,430	1	0.07	1.64	0
11-15	255	6	2.35	2,003	8	0.40	13.11	0
16-20	145	1	0.69	1,127	1	0.09	1.64	0
21-24	63	4	6.35	475	6	1.26	9.84	0
25-29	72	8	11.11	505	11	2.18	18.03	0
30-34	58	4	6.90	364	5	1.37	8.20	0
35+	131	18	13.74	773	27	3.49	44.26	0
<b>TOTAL</b>	<b>983</b>	<b>43</b>	<b>4.37</b>	<b>7,317</b>	<b>61</b>	<b>0.83</b>	<b>100.00</b>	<b>0</b>

### 3.4 Analyses by ship flag

The following Table 5 presents the results of the CIC by the ship flag. A total of 983 individual ships from 61 flag administrations were subjected to CIC inspection during the campaign.

Most inspections were carried out on board of ships flying the flags of Panama with 165 inspections (16.79%), Marshall Islands with 126 inspections (12.82%), Liberia with 121 inspections (12.31%) and Malta with 85 inspections (8.65%).

**Table 5** Results by ship flag

Ship Flag	Nr. of CIC inspections	Nr. of CIC inspection with non-compliant responses	% non-compliant CIC inspections	Total Nr. of applicable responses	Nr. of non-compliances	% of non-compliance	% total non-compliances	CIC topic related detentions
Bahamas	16	0	0.00	125	0	0.00	1.63	0
Barbados	18	2	11.11	136	3	2.21	1.83	0
Comoros	16	2	12.50	94	2	2.13	1.63	0
Greece	20	0	0.00	160	0	0.00	2.03	0
Hong Kong, China	39	0	0.00	312	0	0.00	3.97	0
Liberia	121	3	2.48	956	3	0.31	12.31	0
Malta	85	0	0.00	665	0	0.00	8.65	0
Marshall Islands	126	0	0.00	1,008	0	0.00	12.82	0
Moldova, Republic of	18	5	27.78	116	7	6.03	1.83	0
Panama	165	6	3.64	1,214	8	0.66	16.79	0
Portugal	15	0	0.00	120	0	0.00	1.53	0
Russian Federation	66	4	6.06	437	7	1.60	6.71	0
Singapore	19	0	0.00	152	0	0.00	1.93	0
Turkey	38	0	0.00	289	0	0.00	3.87	0
Vanuatu	17	2	11.76	108	2	1.85	1.73	0
Others	204	19	9.31	1,425	29	2.04	47.54	0
<b>TOTAL</b>	<b>781</b>	<b>139</b>	<b>17.80</b>	<b>4,773</b>	<b>316</b>	<b>6.60</b>	<b>100.00</b>	<b>0</b>

A total of 41 flags covering 47.8% of the total CIC inspections had no non-conformities. When compared by ship flag, Marshall Islands, Malta, Hong-Kong China and Turkey with 126, 85, 39 and 38 showed the best results because of CIC questionnaire recorded without any non-compliance to the CIC topic requirements.

### 3.5 Analyses by ship risk group

Table 6 presents CIC data by ship risk group indicating that higher risk ships have consistently attracted more non-compliant responses per inspection than lower risk ships. That is considered to be validation of the BS MoU Ship Risk Profile System to identify sub-standard vessels for inspection.

HRS and SRS comprised all of the non-compliances, 22 (36.07%) and 39 (63.93%) respectively, and have a higher percentage of non-compliance per applicable questions, 13.51% and 3.72% respectively, than the average (4.31%).

**Table 6** CIC inspection data by ship risk groups

SHIP RISK PROFILE	Nr. of CIC inspections	Nr. of CIC inspection with non-compliant responses	Nr. of non-compliances	Total Nr. of applicable responses	% of non-compliance	% of non-compliant CIC inspections	% total non-compliances	CIC topic related detentions
HRS	111	15	22	729	3.02	13.51	36.07	0
SRS	753	28	39	5,646	0.69	3.72	63.93	0
LRS	119	0	0	942	0.00	0.00	0.00	0
UNKOWN	0	0	0	0			0.00	0
<b>TOTAL</b>	<b>983</b>	<b>43</b>	<b>61</b>	<b>7,317</b>	<b>0.83</b>	<b>4.37</b>	<b>100.00</b>	<b>0</b>

### 3.6 Analyses of the major non-compliances

In this part of the report breakdown of the major non-compliances by ship flag, ship type and ship age is presented below for Questions 5, 7 and 8; with 1 (0.13%) 37 (3.76%) and 23 (2.82%) unsatisfactory responses.

**Question 5** If the ship is provided with a Stability Instrument, is it approved by the Administration?

Of 797 applicable inspections, only 1 was unsatisfactory in this area. This represents 0.13% non-compliance and 1.64% of the total unsatisfactory responses. The unsatisfactory response to this question is to Ukrainian flagged (of 4 total applicable responses with 33.3% of non-compliance) and general cargo/multipurpose vessel (of 158 total applicable responses with 0.63% of non-compliance).

**Question 7** Is there evidence on board to show that the master/loading officer confirms that the “calculated” displacement and trim corresponds with the “observed” draughts? (*for information purposes only*)

Out of 983 total applicable responses to this question, 37 were unsatisfactory in this area (3.76%). This also represents % 3.76 of CIC inspections. The breakdown of the compliance to Question 7 by ship flag and ship type is presented below.

SHIP FLAG	Total Nr. of compliance response	Total Nr. of Non-compliance response	Total Number of applicable response	% of compliance	% of non-compliance
Panama	160	5	165	96.97	3.03
Moldova	14	4	18	77.78	22.22
Russian Federation	62	4	66	93.94	6.06
Palau	11	3	14	78.57	21.43
Others	699	45	720	97.08	2.92
<b>TOTAL</b>	<b>946</b>	<b>37</b>	<b>983</b>	<b>96.24</b>	<b>3.76</b>

The most of total 37 unsatisfactory responses to Question 7 are observed on board three ship types indicated below. General cargo vessels are the least favourable with a high rate of non-compliance responses.

Ship Type	Total Nr. of compliance response	Total Nr. of Non-compliance response	Total Number of applicable response	% of compliance	% of non-compliance
General cargo/multipurpose	287	27	314	91.40	8.60
Livestock carrier	3	4	7	42.86	57.14
Oil /Chemical tanker	80	2	82	97.56	2.44
Other	576	4	580	99.31	0.69
<b>TOTAL</b>	<b>946</b>	<b>37</b>	<b>983</b>	<b>96.24</b>	<b>3.76</b>

**Question 8** If the ship is provided with a Stability Instrument, has the accuracy of the stability instrument been verified periodically by applying at least one approved test condition? (*for information purposes only*)

Of 815 applicable inspections, 23 were unsatisfactory in this area. This represents 2.82% non-compliance and 37.7% of the total unsatisfactory responses. The breakdown of the compliance to Question 8 by ship flag and ship type is presented below.

12 unsatisfactory responses to this question (52.2%) are observed on board of ships flying four flag States while 11 unsatisfactory responses (47.8%) spread over ships flying other flags.

SHIP FLAG	Total Nr. of compliance response	Total Nr. of Non-compliance response	Total Number of applicable responses	% of compliance	% of non-compliance
Panama	130	3	133	97.7	2.3
Moldova	9	3	12	75.0	25.0
Russian Federation	32	3	35	91.4	8.6
Tanzania	2	3	5	40.0	60.0
Other	619	11	120	98.3	1.7
<b>TOTAL</b>	<b>792</b>	<b>23</b>	<b>815</b>	<b>97.2</b>	<b>2.8</b>

The breakdown of the total of 23 unsatisfactory responses to Question 8 is observed on board four ship types indicated below. Livestock carrier is the least favourable leading with a high rate non-compliance response.

SHIP TYPE	Total Nr. of compliance response	Total Nr. of Non-compliance response	Total Number of applicable responses	% of compliance	% of non-compliance
General cargo/multipurpose	159	14	173	91.9	8.1
Livestock carrier	0	2	2	0.0	100.0
Oil tanker	104	2	106	98.1	1.9
Bulk carrier	358	2	360	99.4	0.6
Other	371	3	17	82.4	17.6
<b>TOTAL</b>	<b>792</b>	<b>23</b>	<b>815</b>	<b>97.2</b>	<b>2.8</b>