

**Report of the 2022 Concentrated Inspection Campaign (CIC)
on STCW**

EXECUTIVE SUMMARY

From 1 September 2022 to 30 November 2022, the Black Sea MoU carried out a Concentrated Inspection Campaign (CIC) on Standards of Training, Certification, and Watchkeeping (STCW) throughout the region. This campaign involved all member States of the BS MoU and was conducted in conjunction with the Paris and the Tokyo Memoranda, and other Regional PSC regimes. The campaign was conducted under the campaign coordination of the Bulgarian Maritime Administration. Guidelines and Questionnaires of the Paris and Tokyo Memoranda were used.

This CIC applied to all ships and a ship was subjected to only one CIC inspection during the period of the campaign. During the campaign, a total of 1,329 inspections were carried out for 1,258 individual ships. 1,140 of them were carried out with the CIC questionnaire. During the CIC, 47 ships were detained in total. Of this quantity, 10 of the detentions are the result of inspections without CIC Questionnaires and 5 of these 37 ships were detained under the CIC scope.

A total of 95 questionnaires had at least one non-compliance to any of the requirements, resulting in 8.33 per cent of CIC inspections. The overall average per cent of nonconformities was 1.19 which means that the “unsatisfactory” answer was given to any question under this CIC.

The most un-favourable results are questions 3, 5, 6, 7 and 10, which asked to hold valid endorsements attesting to the recognition of certificates or documentary proof of application (10.4%), to hold valid medical certificates (11.1%), the records for hours of rest indicate compliance with the requirements (27.4%), the watch schedules comply with the provisions of STCW (14.1%) and the voyage plans cover the whole route from berth to berth (29.6%).

A total of 476 (41.75%) CIC inspections concerned general cargo/multi-purpose ships, followed by bulk carriers with 372 (32.63%) inspections, oil/chemical tankers with 108 (9.47%) and oil tankers with 81 (7.11%) inspections, which comprises 1,037 (90.96%) total CIC inspections. All 5 detained ships with CIC-related deficiencies in the Region were general cargo/multipurpose ships.

During the campaign vessels registered by 52 different States were inspected under the CIC scope. Most CIC inspections were carried out on board ships flying the flags of Panama with 206 inspections (18.07%), Liberia with 157 inspections (13.77%), Marshall Islands with 107 inspections (9.39%) and Malta with 82 inspections (7.19%). A total of 27 flags covering 9.65% of the total CIC inspections had no nonconformities. Detained ships with CIC-related deficiencies in the Region were flying the flags of Comoros, Mongolia, Tanzania (2) and Togo.

The situation worsened as the age of ships increased. The percentage of total non-compliant CIC inspections is the highest for 35+ ships with 19.05%. There were no non-compliant CIC inspections for new ships, aged 0-5. All CIC topic related detentions were on vessels more than 25 years old.

1 INTRODUCTION

1.1 Purpose of the report

This report documents the results of the Concentrated Inspection Campaign (CIC) on STCW, which was carried out by BS MoU Member Authorities between September 1st and November 30th, 2022; which was conducted in conjunction with the Paris and Tokyo Memoranda, as well as other Regional PSC Regimes.

1.2 Objective of the CIC

The objective of the Campaign on the STCW aimed to achieve to confirm that the number of seafarers serving on board and their certificates are in conformity with the relevant provisions of STCW and the applicable safe manning requirements of the Administration; to confirm that all seafarers serving on board who are required to be certificated in accordance with the STCW Convention hold an appropriate certificate or a valid dispensation, or provide documentary proof that an application for an endorsement has been submitted to the Administration; to confirm that the seafarers on board are in possession of a valid medical certificate as required by STCW; to confirm that the watch schedules and hours of rest indicate compliance with the STCW requirements; and to raise awareness of shipowners, operators and crew on the specific requirements that the CIC will address.

1.3 Scope of the CIC

The campaign targeted to verify compliance provisions of STCW to assure to have a better understanding of the training and certification situation of crew members in each party to the Convention and on-board ships of various flag States, to check the arrangements made by the shipping company for the performance of new duties by the crew members and the implementation of relevant requirements on watchkeeping and rest on board. The questionnaire for the CIC contains 10 questions;

- whether the number of seafarers serving on board conforms with the Minimum Safe Manning requirement specified for the vessel,
- whether the master and officers hold valid certificates of competency as required by the Minimum Safe Manning Document,
- whether the master, officers and radio operators hold valid endorsements attesting to the recognition of certificates or documentary proof of application,
- whether seafarers hold relevant certificates of proficiency (COP) or documentary evidences,
- whether seafarers on board hold valid medical certificates,
- whether the records for hours of rest indicate compliance with the requirements,
- whether the watch schedules comply with the provisions of STCW,
- whether seafarers newly joined the vessel familiar with their specific duties that are relevant to their routine or emergency duties,
- whether the seafarers on board the vessel communicate effectively with each other in the working language of the vessel, and
- whether the voyage plans cover the whole route from berth to berth.

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 1-10 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 1-10;
- *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 with an asterisk “*” i.e., 1 to 5, 8 and 9, which also coincides with recorded detentions; and
- *Total applicable responses:* Total number of “YES - Compliant” plus “NO - Non-compliant” answers to the questions. “N/A” responses filtered out from the result.

2 SUMMARY, CONCLUSIONS AND RECOMMENDATIONS

2.1 Summary

During the campaign, a total of 1,140 inspections were carried out with the CIC questionnaire. Only one CIC inspection has been carried out on board an individual vessel. This shows that the Regional CIC questionnaire submission rate is 0.91.

The results of the CIC show that a total of 135 non-compliant responses are recorded. 95 of CIC inspections (8.33%) had at least one non-compliant response as a direct result of this campaign on board 1,140 individual vessels subjected to CIC inspections. 5 vessels were detained as a result of CIC inspections.

Analysis of the results of the CIC revealed the following:

- .1 A total of 95 questionnaires had at least one non-compliant response, which resulted in 8.33 per cent of CIC inspections not conforming to the requirements set out in the questionnaire. The overall average per cent of nonconformities was 1.19.
- .2 During the campaign, a total of 47 vessels were detained. Of this quantity, 10 of the detentions are the result of inspections without CIC Questionnaires and 5 of the vessels were detained under the CIC scope (10.6%). The overall detention rate regarding CIC topic related detentions is 0.44%.
- .3 A total of 476 (41.75%) CIC inspections concerned general cargo/multi-purpose ships, followed by bulk carriers with 372 (32.63%) inspections, oil/chemical tankers with 108 (9.47%) and oil tankers with 81 (7.11%) inspections, which comprises 1,037 (90.96%) total CIC inspections.
- .4 All the 5 detained vessels with CIC-related deficiencies in the Region were general cargo/multipurpose ships.
- .5 Vessels from 52 different States were inspected under the CIC scope. Most CIC inspections were carried out on board ships flying the flags of Panama with 206 inspections (18.07%), Liberia with 157 inspections (13.77%), Marshall Islands with 107 inspections (9.39%) and Malta with 82 inspections (7.19%).
- .6 A total of 27 flags covering 9.65% of the total CIC inspections had no nonconformities.
- .7 Detained vessels with CIC-related deficiencies in the Region were flying the flags of Comoros, Mongolia, Tanzania (2) and Togo.
- .8 By ship age, there were no non-compliant CIC inspections for new ships, aged 0-5.
- .9 Older ships, particularly those 25 years and older, are reported the least favourable results. They comprised 75.6% of the total non-compliant and accounted for 72.6% of total non-compliant CIC inspections.
- .10 There are full compliance results (100%) related to whether the master and officers hold valid certificates of competency as required by the Minimum Safe Manning Document (Q2) and whether the seafarers on board the vessel communicate effectively with each other in the working language of the vessel (Q9).
- .11 The most unfavourable results are Questions 3, 5, 6, 7 and 10 which asked for;

Question 3: Do the master, officers and radio operators hold valid endorsements attesting the recognition of certificates or documentary proof of application? (10.4%)

Question 5: Do seafarers on board hold valid medical certificates? (11.1%)

Question 6: Do the records for hours of rest indicate compliance with the requirements? (27.4%)

Question 7: Do the watch schedules comply with the provisions of STCW? (14.1%)

Question 10: Do the voyage plans cover the whole route from berth to berth? (29.6%).

.12 Breakdown of major nonconformities as indicated by “NO” responses have been studied by ship flag and ship type and presented in Section 4.6.

2.2 Conclusions

The overall detention rate regarding CIC topic related detentions is 0.44%. CIC detentions, as a result of CIC-topic related detainable deficiency/deficiencies, are mostly related to whether seafarers on board hold valid medical certificates (Q3) and whether seafarers newly joined the vessel familiar with their specific duties that are relevant to their routine or emergency duties (Q5).

Non-compliant responses of “Records of rest” and “Voyage or passage plan” had the largest number of deficiencies.

There were no non-compliance responses related to whether the master and officers hold valid certificates of competency as required by the Minimum Safe Manning Document (Q2) and whether the seafarers on board the vessel communicate effectively with each other in the working language of the vessel (Q9).

2.3 Recommendations

In relation to the deficiencies “Records of rest” and “Voyage or passage plan” had the largest number of deficiencies.

Thereby, the followings are recommended.

1. Basic findings of the report in general, analysis of the responses to the questionnaire and breakdown of major nonconformities by ship flag, ship type and ship age to be submitted IMO III Sub-Committee.
2. STCW prescribes minimum standards relating to training, certification and watchkeeping for seafarers which countries are obliged to meet or exceed. Thus, continue to put emphasis on the vital requirements of STCW and SOLAS when performing PSC inspections, particularly the requirements that raised the most concern in the CIC;
 - not holding valid endorsements attesting the recognition of certificates or documentary proof of application;
 - not holding valid medical certificates;
 - lack of the records for hours of rest indicating compliance with the requirements;
 - lack of the watch schedules complying with the provisions of STCW; and
 - absence of the voyage plans covering the whole route from berth to berth.
3. Pay diligent attention to verifying compliance with STCW requirements during PSC inspections on older ships, particularly those 25 years and older which are the ships reported the least favourable results within the scope of CIC.

3 CIC QUESTIONNAIRE RESULTS

3.1 General

The total number of inspected ships 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 | 1,258 | 1,140 | 118 |
| Total number of detentions | 47 | 37 | 10 |
| Detentions with CIC-topic deficiencies | 5 | 5 | - |

Looking at the number of inspections performed with a CIC questionnaire (Column 2 of Table 1), the percentage of detentions that were CIC-topic related amounts to:

0.44%

3.2 CIC Questions

The responses to the CIC questionnaire are summarised in **Table 2**. In order to analyse results on an individual question basis, all Not Applicable (N/A) and Blank responses are filtered for the percentage of compliance and noncompliance responses.

Table 2 Responses to CIC questionnaire

| | YES | | NO | | N/A | | Blank | | Detention | |
|------------|------|--------|----|------|-----|------|-------|------|-----------|------|
| | Nr | % | Nr | % | Nr | % | Nr | % | Nr | % |
| Q1 | 1139 | 99.9% | 1 | 0.1% | 0 | 0.0% | 0 | 0.0% | 1 | 0.1% |
| Q2 | 1139 | 100.0% | 0 | 0.0% | 1 | 0.1% | 0 | 0.0% | 0 | 0.0% |
| Q3 | 1079 | 98.7% | 14 | 1.3% | 47 | 4.1% | 0 | 0.0% | 1 | 0.1% |
| Q4 | 1134 | 99.6% | 4 | 0.4% | 2 | 0.2% | 0 | 0.0% | 1 | 0.1% |
| Q5 | 1125 | 98.7% | 15 | 1.3% | 0 | 0.0% | 0 | 0.0% | 2 | 0.2% |
| Q6 | 1102 | 96.8% | 37 | 3.2% | 1 | 0.1% | 0 | 0.0% | 0 | 0.0% |
| Q7 | 1121 | 98.3% | 19 | 1.7% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Q8 | 1124 | 99.6% | 5 | 0.4% | 11 | 1.0% | 0 | 0.0% | 2 | 0.2% |
| Q9 | 1139 | 100.0% | 0 | 0.0% | 1 | 0.1% | 0 | 0.0% | 0 | 0.0% |
| Q10 | 1100 | 96.5% | 40 | 3.5% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |

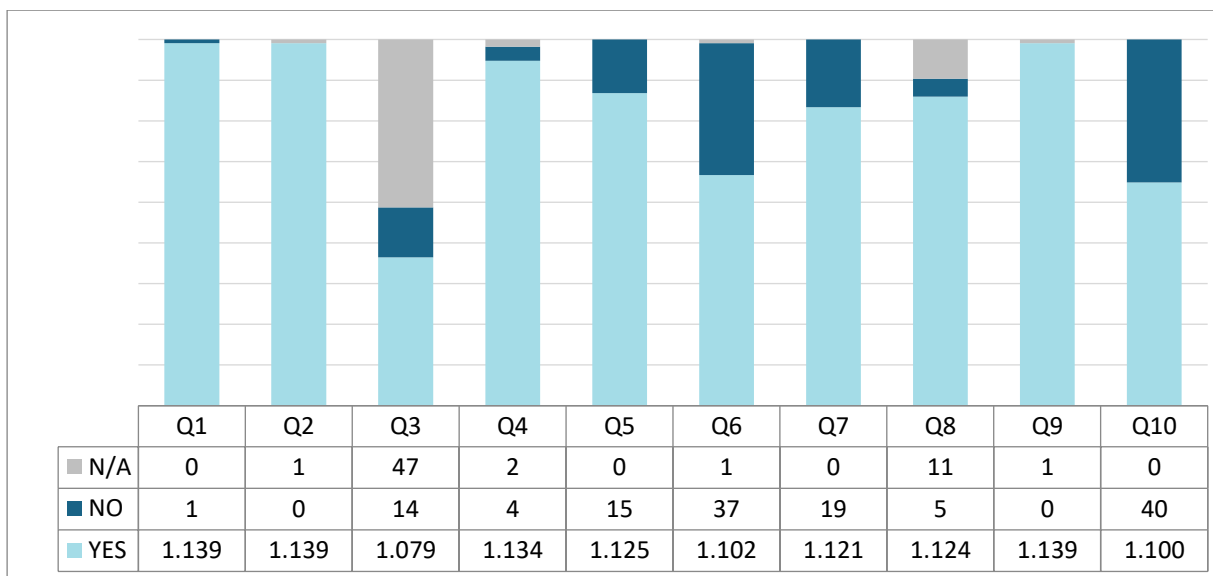


Figure 1 Responses for each of the 10 questions compliance to the requirements

Breakdown CIC inspections, inspections with nonconformities to the requirements set out in the questionnaire, the average percentage of nonconformities, number of unfavourable responses/nonconformities and CIC topic related detentions by ship type, ship age, ship flag and ship risk profiles presented in **Section 4.2 - Section 4.5** of this report. The breakdowns of the major nonconformities by ship flag, ship type and ship age are presented in **Section 4.6**. The comparison of questions with non-compliant responses is set out in **Section 4.7**.

4 DETAILED ANALYSIS OF CIC INSPECTION DATA

4.1 Inspection summary during CIC Period

Table 3 below captures “detention” resulted inspections during the campaign period. While the percentage of Detentions with CIC-topic related deficiencies to total PSC of Detentions was 10.64, the percentage of CIC-topic related Detainable deficiencies to total Detainable deficiencies was 7.20 during the campaign period.

Table 3 Inspection summary during CIC period

| | |
|---|-------|
| Total PSC Inspections | 1,329 |
| Nr. of PSC Inspections for individual vessels | 1.258 |
| Total PSC of Detentions | 47 |
| Total PSC detainable deficiencies | 250 |
| Inspections CIC-topic related | 1,140 |
| Detainable deficiencies CIC-topic related | 18 |
| Detentions with CIC-topic related deficiencies | 5 |
| % of Detentions with CIC-topic related deficiencies to Inspections CIC-topic related | 0.44 |
| % of Detentions with CIC-topic related deficiencies to Total PSC of Detentions | 10.64 |
| % of Detentions with CIC-topic related deficiencies to Total PSC Inspections for individual vessels | 0.40 |

4.2 Analyses by ship flag

The following **Table 4** presents the results of the CIC by the ship flag. A total of 1,140 individual ships from 52 flag administrations were subjected to CIC inspections during the campaign.

Table 4 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 | % CIC topic related detentions |
|----------------------------------|------------------------|--|---------------------------------|-----------------------------------|------------------------|---------------------|-------------------------|------------------------------|--------------------------------|
| Panama | 206 | 19 | 9.22 | 2,059 | 23 | 1.12 | 17.04 | 0 | 0.00 |
| Liberia | 157 | 1 | 0.64 | 1,568 | 1 | 0.06 | 0.74 | 0 | 0.00 |
| Marshall Islands | 107 | 2 | 1.87 | 1,069 | 2 | 0.19 | 1.48 | 0 | 0.00 |
| Malta | 82 | 2 | 2.44 | 820 | 2 | 0.24 | 1.48 | 0 | 0.00 |
| Palau | 64 | 10 | 15.63 | 639 | 14 | 2.19 | 10.37 | 0 | 0.00 |
| Russian Federation | 62 | 10 | 16.13 | 585 | 12 | 2.05 | 8.89 | 0 | 0.00 |
| Türkiye | 62 | 3 | 4.84 | 611 | 5 | 0.82 | 3.70 | 0 | 0.00 |
| Comoros | 38 | 5 | 13.16 | 379 | 6 | 1.58 | 4.44 | 1 | 2.63 |
| Barbados | 33 | 0 | 0.00 | 328 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| Togo | 33 | 6 | 18.18 | 330 | 12 | 3.64 | 8.89 | 1 | 3.03 |
| Vanuatu | 30 | 3 | 10.00 | 299 | 3 | 1.00 | 2.22 | 0 | 0.00 |
| Cameroon | 29 | 8 | 27.59 | 287 | 13 | 4.53 | 9.63 | 0 | 0.00 |
| Sierra Leone | 25 | 1 | 4.00 | 249 | 2 | 0.80 | 1.48 | 0 | 0.00 |
| Tanzania, United Republic of | 23 | 7 | 30.43 | 230 | 14 | 6.09 | 10.37 | 2 | 8.70 |
| Bahamas | 18 | 4 | 22.22 | 180 | 4 | 2.22 | 2.96 | 0 | 0.00 |
| Singapore | 18 | 2 | 11.11 | 180 | 2 | 1.11 | 1.48 | 0 | 0.00 |
| Greece | 16 | 0 | 0.00 | 159 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| Saint Kitts and Nevis | 16 | 1 | 6.25 | 159 | 2 | 1.26 | 1.48 | 0 | 0.00 |
| Belize | 15 | 3 | 20.00 | 150 | 4 | 2.67 | 2.96 | 0 | 0.00 |
| Hong Kong, China | 13 | 1 | 7.69 | 130 | 1 | 0.77 | 0.74 | 0 | 0.00 |
| Antigua and Barbuda | 10 | 1 | 10.00 | 100 | 1 | 1.00 | 0.74 | 0 | 0.00 |
| Cook Islands | 8 | 0 | 0.00 | 80 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| Portugal | 7 | 0 | 0.00 | 70 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| Azerbaijan | 6 | 1 | 16.67 | 57 | 3 | 5.26 | 2.22 | 0 | 0.00 |
| Saint Vincent and the Grenadines | 6 | 1 | 16.67 | 60 | 2 | 3.33 | 1.48 | 0 | 0.00 |
| Cyprus | 5 | 0 | 0.00 | 50 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| Netherlands | 5 | 0 | 0.00 | 50 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| Others | 46 | 4 | 8.70 | 459 | 7 | 1.53 | 5.19 | 1 | 2.17 |
| TOTAL | 1,140 | 95 | 8.33 | 11,337 | 135 | 1.19 | 100.00 | 5 | 0.44 |

Most inspections were carried out on board ships flying the flags of Panama with 206 inspections (18.07%), Liberia with 157 inspections (13.77%), Marshall Islands with 107 inspections (9.39%) and Malta with 82 inspections (7.19%). A total of 25 flag Administrations had one or more non-compliance responses to the questionnaire, the remaining 27 flags covering 9.65% of the total CIC inspections had no nonconformities.

The top 5 Flags in terms of the number of nonconformities were Panama (23 non-compliances and 1.12% of total non-compliances), Palau (14 and 2.19%), Tanzania (14 and 6.09%), Cameroon (13 and 4.53%) and Russian Federation (12 and 2.05%).

During the three months campaign, as a result of a CIC-related detainable deficiency, 5 vessels flying the flags of Comoros, Mongolia, Tanzania (2) and Togo were detained in the Region.

When compared by ship flag, Barbados, Greece, Cook Island and Portugal with 33, 16, 8 and 7 inspections, respectively showed the best results because of the CIC questionnaire recorded without any non-compliance to the CIC topic requirements.

4.3 Analyses by Ship types

A total of 476 (41.75%) CIC inspections concerned general cargo/multi-purpose ships followed by bulk carriers with 372 (32.63%) inspections, which comprises 848(74.38%) total CIC inspections.

Table 5 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 | % CIC topic related detentions |
|--------------------------------------|------------------------|--|---------------------------------|-----------------------------------|------------------------|---------------------|-------------------------|------------------------------|--------------------------------|
| Bulk carrier | 372 | 14 | 3.76 | 3,712 | 14 | 0.38 | 10.37 | 0 | 0.00 |
| Chemical tanker | 3 | 1 | 33.33 | 29 | 2 | 6.90 | 1.48 | 0 | 0.00 |
| Combination carrier | 1 | 1 | 100.00 | 10 | 1 | 10.00 | 0.74 | 0 | 0.00 |
| Container Ship | 46 | 3 | 6.52 | 456 | 3 | 0.66 | 2.22 | 0 | 0.00 |
| Gas carrier | 8 | 0 | 0.00 | 80 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| General cargo/multipurpose | 476 | 57 | 11.97 | 4,715 | 86 | 1.82 | 63.70 | 5 | 1.05 |
| Livestock carrier | 9 | 1 | 11.11 | 90 | 1 | 1.11 | 0.74 | 0 | 0.00 |
| Offshore supply | 3 | 3 | 100.00 | 30 | 3 | 10.00 | 2.22 | 0 | 0.00 |
| Oil tanker | 81 | 2 | 2.47 | 808 | 2 | 0.25 | 1.48 | 0 | 0.00 |
| Oil tanker/Chemical tanker (OILCHEM) | 108 | 3 | 2.78 | 1,078 | 4 | 0.37 | 2.96 | 0 | 0.00 |
| Passenger ship | 1 | 0 | 0.00 | 10 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| Refrigerated cargo | 1 | 0 | 0.00 | 10 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| Ro-Ro cargo | 16 | 6 | 37.50 | 160 | 10 | 6.25 | 7.41 | 0 | 0.00 |
| Ro-Ro passenger ship | 6 | 2 | 33.33 | 60 | 4 | 6.67 | 2.96 | 0 | 0.00 |
| Tug | 6 | 2 | 33.33 | 59 | 5 | 8.47 | 3.70 | 0 | 0.00 |
| Vehicle carrier | 3 | 0 | 0.00 | 30 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| TOTAL | 1,140 | 95 | 8.33 | 11,337 | 135 | 1.19 | 100.00 | 5 | 0.44 |

The majority of observed nonconformities were on general cargo/multi-purpose ships with 86 deficiencies, bulk carriers with 14 deficiencies and Ro-Ro cargo ships with 10 deficiencies.

During the campaign period, the number of detentions with CIC-topic related deficiencies in the Region was 5 and all these detained vessels were general cargo/multipurpose ships.

4.3 Analyses by ship age

By ship age, older ships, particularly those 25 years and older, are reported the least favourable results. They comprised 75.6% of the total non-compliances and accounted for 72.6% of total non-compliant CIC inspections. Also, it is observed that there were no non-compliant CIC inspections for new ships which are less than 5 years old. Results by ship age are presented in **Table 6** below.

Table 6 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 | % CIC topic related detentions |
|--------------|------------------------|--|---------------------------------|-----------------------------------|------------------------|---------------------|-------------------------|------------------------------|--------------------------------|
| 0-5 | 49 | 0 | 0.00 | 485 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| 6-10 | 108 | 2 | 1.85 | 1,075 | 2 | 0.19 | 1.48 | 0 | 0.00 |
| 11-15 | 242 | 11 | 4.55 | 2412 | 16 | 0.66 | 11.85 | 0 | 0.00 |
| 16-20 | 210 | 8 | 3.81 | 2,094 | 10 | 0.48 | 7.41 | 0 | 0.00 |
| 21-24 | 110 | 5 | 4.55 | 1,096 | 5 | 0.46 | 3.70 | 0 | 0.00 |
| 25-29 | 132 | 15 | 11.36 | 1,315 | 21 | 1.60 | 15.56 | 1 | 0.76 |
| 30-34 | 100 | 18 | 18.00 | 988 | 27 | 2.73 | 20.00 | 2 | 2.00 |
| 35+ | 189 | 36 | 19.05 | 1,872 | 54 | 2.88 | 40.00 | 2 | 1.06 |
| TOTAL | 1,140 | 95 | 8.33 | 11,337 | 135 | 1.19 | 100.00 | 5 | 0.44 |

4.5 Analyses by ship risk group

The results of the CIC classified in accordance with the Ship Risk Groups are provided in **Table 7** below.

Table 7 CIC inspection data by ship risk groups

| SHIP RISK PROFILE | Nr. of CIC inspections | Nr. of CIC inspection with non-compliant responses | % of non-compliant CIC inspections | Total Nr. of applicable responses | Nr. of non-compliances | % of non-compliance | % total non-compliances | CIC topic related detentions | % CIC topic related detentions |
|-------------------|------------------------|--|------------------------------------|-----------------------------------|------------------------|---------------------|-------------------------|------------------------------|--------------------------------|
| HRS | 180 | 25 | 13.89 | 1,789 | 33 | 1.84 | 24.44 | 1 | 0.56 |
| SRS | 843 | 68 | 8.07 | 8,379 | 100 | 1.19 | 74.07 | 4 | 0.47 |
| LRS | 117 | 2 | 1.71 | 1,169 | 2 | 0.17 | 1.48 | 0 | 0.00 |
| TOTAL | 1,140 | 95 | 8.33 | 11,337 | 135 | 1.19 | 100.00 | 5 | 0.44 |

The table indicates that higher risk ships have consistently attracted more non-compliant responses percentage than standard and lower risk ships. LRS has only 2 CIC related deficiencies and none of these deficiencies are detainable deficiencies. That is considered to be validation of the BS MoU Ship Risk Profile System to identify sub-standard vessels for inspection.

4.6 Analyses of the major non-compliances

In this part of the report, the breakdowns of the major non-compliances by ship flag, ship type and ship age are presented below for Questions 3, 5, 6, 7 and 10; with 14 (10.4%), 15 (11.1%), 37 (27.4%), 19 (14.1%) and 40 (29.6%) unsatisfactory responses, respectively.

Question 3 Do the master, officers and radio operators hold valid endorsements attesting the recognition of certificates or documentary proof of application?

Of 1,093 applicable inspections, 14 of them were unsatisfactory in this area. This represents 1.3% non-compliance and 10.4% of the total unsatisfactory responses. For these unsatisfactory

responses, 5 of them (35.7%) were observed on board of ships flying Panama, 9 of them were on general cargo/multipurpose vessels and half of them were more than 30 years old.

| SHIP FLAG | Nr. of CIC inspections | Nr. of non-compliances | % of non-compliance | % total non-compliances |
|-------------------|------------------------|------------------------|---------------------|-------------------------|
| Panama | 206 | 5 | 2.43 | 35.71 |
| Palau | 64 | 2 | 3.13 | 14.29 |
| Mongolia | 2 | 1 | 50.00 | 7.14 |
| Equatorial Guinea | 3 | 1 | 33.33 | 7.14 |
| Others | 865 | 5 | 0.58 | 35.71 |
| TOTAL | 1140 | 14 | 1.23 | 100.00 |

| Ship Type | Nr. of CIC inspections | Nr. of non-compliances | % of non-compliance | % total non-compliances |
|--------------------------------------|------------------------|------------------------|---------------------|-------------------------|
| General cargo/multipurpose | 476 | 9 | 1.89 | 64.29 |
| Bulk carrier | 372 | 2 | 0.54 | 14.29 |
| Offshore supply | 3 | 1 | 33.33 | 7.14 |
| Oil tanker/Chemical tanker (OILCHEM) | 108 | 1 | 0.93 | 7.14 |
| Tug | 6 | 1 | 16.67 | 7.14 |
| TOTAL | 1140 | 14 | 1.23 | 100.00 |

| Ship Age | Nr. of CIC inspections | Nr. of non-compliances | % of non-compliance | % total non-compliances |
|--------------|------------------------|------------------------|---------------------|-------------------------|
| 30-34 | 100 | 4 | 4.00 | 28.57 |
| 35+ | 189 | 3 | 1.59 | 21.43 |
| 16-20 | 210 | 2 | 0.95 | 14.29 |
| 21-24 | 110 | 2 | 1.82 | 14.29 |
| Others | 531 | 3 | 0.56 | 21.43 |
| TOTAL | 1140 | 14 | 1.23 | 100.00 |

Question 5 Do seafarers on board hold valid medical certificates?

Out of 135 unsatisfactory responses 15 CIC related deficiencies were recorded in this area and 2 of these deficiencies were considered a detainable deficiency. This represents 1.3% of CIC inspections. A breakdown of the compliance to **Question 5** by ship flag, ship type and ship age is presented below.

| SHIP FLAG | Nr. of CIC inspections | Nr. of non-compliances | % of non-compliance | % total non-compliances |
|--------------|------------------------|------------------------|---------------------|-------------------------|
| Panama | 206 | 6 | 2.91 | 40.00 |
| Tanzania | 23 | 3 | 13.04 | 20.00 |
| Bahamas | 18 | 1 | 5.56 | 6.67 |
| Belize | 15 | 1 | 6.67 | 6.67 |
| Others | 878 | 4 | 0.46 | 26.67 |
| TOTAL | 1140 | 15 | 1.32 | 100.00 |

| Ship Type | Nr. of CIC inspections | Nr. of non-compliances | % of non-compliance | % total non-compliances |
|--------------------------------------|------------------------|------------------------|---------------------|-------------------------|
| General cargo/multipurpose | 476 | 5 | 1.05 | 33.33 |
| Bulk carrier | 372 | 4 | 1.08 | 26.67 |
| Container Ship | 46 | 3 | 6.52 | 20.00 |
| Livestock carrier | 9 | 1 | 11.11 | 6.67 |
| Oil tanker/Chemical tanker (OILCHEM) | 108 | 1 | 0.93 | 6.67 |
| Ro-Ro cargo | 16 | 1 | 6.25 | 6.67 |
| TOTAL | 1140 | 15 | 1.32 | 100.00 |

| Ship Age | Nr. of CIC inspections | Nr. of non-compliances | % of non-compliance | % total non-compliances |
|--------------|------------------------|------------------------|---------------------|-------------------------|
| 30-34 | 100 | 4 | 4.00 | 26.67 |
| 35+ | 189 | 3 | 1.59 | 20.00 |
| 25-29 | 132 | 3 | 2.27 | 20.00 |
| 21-24 | 110 | 2 | 1.82 | 13.33 |
| 16-20 | 210 | 2 | 0.95 | 13.33 |
| 11-15 | 242 | 1 | 0.41 | 6.67 |
| TOTAL | 1140 | 15 | 1.32 | 100.00 |

Question 6 Do the records for hours of rest indicate compliance with the requirements?

The second highest number of unsatisfactory results was recorded in this area. 37 vessels had non-compliance responses to this question. A breakdown of the non-compliances to **Question 6** by ship flag, ship type and ship age is presented below. General cargo vessels are the least favourable with a high rate of non-compliance responses. And, 21 of them (56.8%) are at least 35 years old.

| SHIP FLAG | Nr. of CIC inspections | Nr. of non-compliances | % of non-compliance | % total non-compliances |
|--------------------|------------------------|------------------------|---------------------|-------------------------|
| Palau | 64 | 5 | 7.81 | 13.51 |
| Russian Federation | 62 | 5 | 8.06 | 13.51 |
| Togo | 33 | 4 | 12.12 | 10.81 |
| Panama | 206 | 3 | 1.46 | 8.11 |
| Tanzania | 23 | 3 | 13.04 | 8.11 |
| Others | 752 | 17 | 2.26 | 45.95 |
| TOTAL | 1140 | 37 | 3.25 | 100.00 |

| Ship Type | Nr. of CIC inspections | Nr. of non-compliances | % of non-compliance | % total non-compliances |
|----------------------------|------------------------|------------------------|---------------------|-------------------------|
| General cargo/multipurpose | 476 | 26 | 5.46 | 70.27 |
| Ro-Ro cargo | 16 | 5 | 31.25 | 13.51 |
| Offshore supply | 3 | 2 | 66.67 | 5.41 |
| Others | 645 | 4 | 0.62 | 10.81 |
| TOTAL | 1140 | 37 | 3.25 | 100.00 |

| Ship Age | Nr. of CIC inspections | Nr. of non-compliances | % of non-compliance | % total non-compliances |
|--------------|------------------------|------------------------|---------------------|-------------------------|
| 35+ | 189 | 21 | 11.11 | 56.76 |
| 11-15 | 242 | 6 | 2.48 | 16.22 |
| 25-29 | 132 | 4 | 3.03 | 10.81 |
| 30-34 | 100 | 4 | 4.00 | 10.81 |
| 16-20 | 210 | 2 | 0.95 | 5.41 |
| TOTAL | 1140 | 37 | 3.25 | 100.00 |

Question 7 Do the watch schedules comply with the provisions of STCW?

There were 19 unsatisfactory responses to this question. This represents 14.1% of all unsatisfactory responses. 12 of these vessels were general cargo/multipurpose vessels and 15 of them were higher than 25 years old. A breakdown of the non-compliances to **Question 7** by ship flag, ship type and ship age is presented below.

| SHIP FLAG | Nr. of CIC inspections | Nr. of non-compliances | % of non-compliance | % total non-compliances |
|--------------|------------------------|------------------------|---------------------|-------------------------|
| Tanzania | 23 | 3 | 13.04 | 15.79 |
| Palau | 64 | 3 | 4.69 | 15.79 |
| Cameroon | 29 | 3 | 10.34 | 15.79 |
| Panama | 206 | 2 | 0.97 | 10.53 |
| Others | 818 | 8 | 0.98 | 42.11 |
| TOTAL | 1140 | 19 | 1.67 | 100.00 |

| Ship Type | Nr. of CIC inspections | Nr. of non-compliances | % of non-compliance | % total non-compliances |
|----------------------------|------------------------|------------------------|---------------------|-------------------------|
| General cargo/multipurpose | 476 | 12 | 2.52 | 63.16 |
| Bulk carrier | 372 | 2 | 0.54 | 10.53 |
| Ro-Ro cargo | 16 | 2 | 12.50 | 10.53 |
| Others | 276 | 3 | 1.09 | 15.79 |
| TOTAL | 1140 | 19 | 1.67 | 100.00 |

| Ship Age | Nr. of CIC inspections | Nr. of non-compliances | % of non-compliance | % total non-compliances |
|--------------|------------------------|------------------------|---------------------|-------------------------|
| 35+ | 189 | 7 | 3.70 | 36.84 |
| 25-29 | 132 | 5 | 3.79 | 26.32 |
| 30-34 | 100 | 3 | 3.00 | 15.79 |
| 11-15 | 242 | 3 | 1.24 | 15.79 |
| 6-10 | 108 | 1 | 0.93 | 5.26 |
| TOTAL | 1140 | 19 | 1.67 | 100.00 |

Question 10 Do the voyage plans cover the whole route from berth to berth?

The Question raises concern and account for the highest number of unsatisfactory results under this CIC. Of 1,140 inspections 40 were unsatisfactory in this area. This represents 3.51% of questionnaire and 29.63% of the total unsatisfactory responses.

A breakdown of the compliance to **Question 10** by ship flag, ship type and ship age is presented below. Cameroon (6), Russian Federation (6), Panama (5), Togo (4) and Comoros (4) are the top 5 flag Authorities that have unsatisfactory responses to this question. General cargo vessels are the least favourable with a high rate of non-compliance responses (27 and 67.5%) and the vessels aged 30 and older have 26 unsatisfactory responses with 65%.

| SHIP FLAG | Nr. of CIC inspections | Nr. of non-compliances | % of non-compliance | % total non-compliances |
|--------------------|------------------------|------------------------|---------------------|-------------------------|
| Cameroon | 29 | 6 | 20.69 | 15.00 |
| Russian Federation | 62 | 6 | 9.68 | 15.00 |
| Panama | 206 | 5 | 2.43 | 12.50 |
| Togo | 33 | 4 | 12.12 | 10.00 |
| Comoros | 38 | 4 | 10.53 | 10.00 |
| Others | 772 | 15 | 1.94 | 37.50 |
| TOTAL | 1140 | 40 | 3.51 | 100.00 |

| Ship Type | Nr. of CIC inspections | Nr. of non-compliances | % of non-compliance | % total non-compliances |
|----------------------------|------------------------|------------------------|---------------------|-------------------------|
| General cargo/multipurpose | 476 | 27 | 5.67 | 67.50 |
| Bulk carrier | 372 | 4 | 1.08 | 10.00 |
| Oil tanker | 81 | 2 | 2.47 | 5.00 |
| Ro-Ro cargo | 16 | 2 | 12.50 | 5.00 |
| Tug | 6 | 2 | 33.33 | 5.00 |
| Others | 189 | 3 | 1.59 | 7.50 |
| TOTAL | 1140 | 40 | 3.51 | 100.00 |

| Ship Age | Nr. of CIC inspections | Nr. of non-compliances | % of non-compliance | % total non-compliances |
|--------------|------------------------|------------------------|---------------------|-------------------------|
| 35+ | 189 | 16 | 8.47 | 40.00 |
| 30-34 | 100 | 10 | 10.00 | 25.00 |
| 25-29 | 132 | 5 | 3.79 | 12.50 |
| 16-20 | 210 | 4 | 1.90 | 10.00 |
| 11-15 | 242 | 4 | 1.65 | 10.00 |
| 21-24 | 110 | 1 | 0.91 | 2.50 |
| TOTAL | 1140 | 40 | 3.51 | 100.00 |

4.7 Comparison of the recorded deficiencies

Difference between the non-compliant responses to the CIC topic requirement and the recorded deficiencies indicated in the CIC Guidelines presented below **Table 8**.

Table 8 Questions non-compliant responses and recorded deficiencies, detentions

| Question | Deficiency Code | Nature of Deficiency | Nr. of NO response to this question | Nr. of CIC inspection with this deficiency | Number of this CIC Deficiency | Nr. of this CIC detainable deficiency | Number of CIC inspection with detention including this detainable deficiency | Nr. of RO Related this CIC detainable deficiency |
|----------|-----------------|---|-------------------------------------|--|-------------------------------|---------------------------------------|--|--|
| Q1 | 01209 | Manning specified by the minimum safe manning doc | 1 | 2 | 2 | 1 | 1 | 0 |
| Q2 | 01201 | Certificates for master and officers | 0 | 1 | 1 | 0 | 0 | 0 |
| | 01203 | Certificates for radio personnel | | 1 | 1 | 0 | 0 | 0 |
| Q3 | 01214 | Endorsement by flag state | 14 | 11 | 12 | 1 | 1 | 0 |
| | 01215 | Application for Endorsement by flag state | | 9 | 9 | 0 | 0 | 0 |
| Q4 | 01202 | Certificate for rating for watchkeeping | 4 | 1 | 1 | 1 | 1 | 0 |
| | 01210 | Certificate for medical first aid | | 1 | 1 | 0 | 0 | 0 |
| | 01212 | Certificate for medical care | | 2 | 2 | 0 | 0 | 0 |
| | 01220 | Seafarers' employment agreement (SEA) | | 12 | 13 | 0 | 0 | 0 |
| | 01223 | Security awareness training | | 1 | 1 | 0 | 0 | 0 |
| | 01299 | Other (STCW) | | 2 | 2 | 1 | 1 | 0 |
| Q5 | 01218 | Medical certificate | 15 | 15 | 15 | 2 | 2 | 0 |
| Q6 | 01308 | Records of rest | 37 | 48 | 48 | 1 | 1 | 0 |
| Q7 | 01306 | Schedules for watchkeeping personnel | 19 | 23 | 23 | 0 | 0 | 0 |
| Q8 | 04121 | Crew familiarization with Emergency Systems | 5 | 19 | 20 | 2 | 2 | 0 |
| Q9 | 10136 | Establishment of working language onboard | 0 | 2 | 2 | 0 | 0 | 0 |
| Q10 | 10127 | Voyage or passage plan | 40 | 62 | 62 | 3 | 3 | 0 |