Deficiencies:  

**Code - Category**

15108 - Reports of non-conf., accidents & hazardous occur.

**Description**

Objective evidence discovered during an expanded ISM exam revealed the following non-conformities: The vessel failed to fully implement the requirements of the ISM Code through their SMS procedures. These identified deficiencies are evidence that the ship and/or company are not meeting the SMS requirements. Recommend and external audit.

The company should ensure that the policy is implemented and maintained at all levels of the organizations, both ship-based and shore-based. The SMS has not been adequately implemented and maintained ashore or onboard as evidence by non-conformities being reported but no action was taken by the company. On 12Jan2019, vessel reported the following 04 non-conformities to the company and have not yet been resolved: broke beams on ramp need welding, bridge water tight door not closing properly, port anchor needs to be welded to adjust crossbar, and ballast water pipe broken in engine room. Since reporting the non-conformities, the vessel has entered a U.S. port 20 times, its home port more than 10, and could have received the service/parts needed to correct the reported non-conformities; however, the company has not taken corrective action. In addition, multiple non-conformities were known to the crew but went unreported. Crew members were aware of Coast Guard issued deficiencies #5, 8, 9, and 10 prior to the Port State Control boarding and did not fill out a non-conformity report in accordance with the SMS requirements.

The company should ensure that all personnel involved in the company’s safety management system have an adequate understanding of relevant rules, regulations, codes and guidelines. The identified material deficiencies 2, 3, 4, 5, 7 and 11 were unknown to the vessel's crewmembers, and no non-conformity reports were made.

The company should establish procedures, plans, and instructions, including checklists as appropriate, for key shipboard operations concerning the safety of the personnel, ship, and protection of the environment. No checklist is provided by the company instructions how often, procedures, or list of items to check regarding the ship’s first aid kits. Both first aid kits carried onboard the vessel contained in excess of 75% expired and damaged items. In addition, the crew has multiple checklist for engineering and check department rounds, maintenance, and regular task that are not listed in the
vessel's SMS. In addition, the vessel's deck department found a wasted fire hydrant pipe that was verbally reported to the DPS; however, the engineering department was not aware and did not track the required corrective actions.

10111 - Charts

All ships, irrespective of size, shall have: nautical charts to plan and display the ship's route for the intended voyage and to plot and monitor positions throughout the voyage. An Electronic Chart Display and Information System (ECDIS) is also accepted as meeting the chart carriage requirements. The ship's electronic chart display does not meet the ECDIS performance requirements as stated in resolution A.817(19). The vessel used paper chart 25640 with scale 1:326, 856 which does not display detailed navigational characteristics attributing to safe and efficient course plotting into Guayanilla Harbor. The appropriate chart for Guayanilla Harbor is chart 25681 with scale 1:10,000.