

Report of the 2017 Concentrated Inspection Campaign (CIC)  
on Safety of Navigation including ECDIS



## EXECUTIVE SUMMARY

From 1<sup>st</sup> September 2017 to 30<sup>th</sup> November 2017, the BS MOU carried out a Concentrated Inspection Campaign (CIC) on Safety of Navigation throughout the region. This campaign involved all member States of the BS MOU and was conducted in conjunction with the Tokyo MOU and Paris MOU and other MOUs. The campaign was conducted under the campaign coordination of the Bulgarian Maritime Administration. Paris and Tokyo MOUs guidelines and questionnaire were used.

During the campaign, a total of 983 inspections were carried out with the CIC questionnaire involving 983 individual ships. Of this quantity 59 ships were detained with 21 (35.6%) detentions being within the CIC scope. This means that in 21 cases the navigation systems are not meeting SOLAS requirements and had deficiencies, which were serious enough to detain the ship, resulting in a CIC-topic related detention rate of 2.14 per cent.

A total of 180 questionnaires had at least a non-compliance to a requirement, resulting 18.3 per cent of CIC inspections. The overall average per cent of non-conformities was 2.68.

The most notable non-conformities observed was lack of exhibition of navigation/signal lights in accordance with the requirements of COLREG72 (7.6%), followed by lack of passage plan covering the whole voyage (6.2%) and whether ship's VDR/SVDR record data fully (2.9%).

A total of 358 (36.42%) CIC inspections concerned general cargo/multi-purpose ships, followed by bulk carriers with 333 (33.88%) inspections, oil tankers with 130 (13.22%) inspections and chemical tankers with 72 (7.32%) inspections, which comprises 821 (83.51%) total CIC inspections.

A total of 13 (61.9%) ships detained for CIC-related deficiencies were general cargo/multipurpose ships, followed by bulk carriers with 4 (19.05%) detentions, and Ro-Ro Cargo ships with 2 (9.52%) detentions, which comprises 19 (90.48%) of CIC topic related detentions.

Most inspections were carried out on board ships flying the flags of Panama with 147 (14.95%) inspections, Malta with 109 (11.08%) inspections, Liberia with 74 (7.53%) inspections and Turkey with 70 (7.12%) inspections.

A total of 12 flags had CIC-topic related detentions. These flags cover 55.65% of the CIC inspections.

A total of 43 flags, covering 44.35% of the CIC inspections, had no CIC-related detentions at all.

A total of 24 flags, covering 9.76% of the total CIC inspections, had no non-conformities.

It is observed that ships younger than 15 years age performing relatively well with 566 (58.58%) inspections with only 2 CIC topic related detentions.

Older ships, particularly those 30 years and older, show reason for concern with majority of detentions 11 (52.4%) and 98 (40.0%) non-conformities, although subjecting one fourth of inspections 241 (24.5%).

# REPORT OF THE CONCENTRATED INSPECTION CAMPAIGN (CIC) ON SAFETY OF NAVIGATION INCLUDING ECDIS

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# 1 INTRODUCTION

## 1.1 Purpose of the report

This report documents the results of the Concentrated Inspection Campaign (CIC) on Safety of Navigation, including ECDIS, which was carried out by 6 BS MOU Member Authorities between September 1<sup>st</sup> and November 30<sup>th</sup>, 2017. This campaign was conducted in conjunction with the Paris and Tokyo MOUs as well as other MOUs shows results presented in this report.

## 1.2 Objective of the CIC

The objective of the Campaign on the Safety of Navigation aimed at checking the conformity of safety regulations for ships, the overall status of the vessel's navigation safety, and the competency of crew involved in navigation operations. The results of the CIC, which reveal that a total of 245 non-conformities and 180 CIC inspections with at least one non-compliant response recorded, as a direct result of this campaign on board 983 individual vessel subjected CIC inspections.

## 1.3 Scope of the CIC

The campaign targeted 11 aspects to verify compliance provisions of SOLAS Chapter V to assure that:

- .1 For ships of all types, equipment shall conform with valid legal certificates, and shall be accompanied with proper records;
- .2 Related equipment shall be accompanied with valid type approval certificates;
- .3 Related equipment shall receive proper maintenance and shall function properly; and
- .4 The captain and officers in carrying out their duties shall be familiar with operation of bridge equipment, especially ECDIS.

The Paris MOU guidelines and questionnaire utilized. The guideline provides aid to CIC for SOLAS Chapter V, besides, PSCOs shall refer to the following files:

- SOLAS 74 Chapter V
- Regulation 9 of Chapter I STCW I/4 and I/14
- COLREG 72

## 1.4 General remarks

This report presents 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 applicable response (Except Table 1);
- *Non-compliant response*: a “NO” response to any of the questions 1-11 which indicates non-compliance to a requirement in the questionnaire;
- *CIC inspection with non-compliant response*: Questionnaire with at least one “NO” response to any question 1-11;

- Non-compliant response: “NO” response to a question, indication non-compliance of a requirement;
- *CIC Detention*: a CIC-topic related detention which is indicated by a “YES” response to Question 12, 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 ANALYSIS, CONCLUSIONS AND RECOMMENDATIONS

### 2.1 Summary analysis

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.

Analysis of the results of the CIC revealed the following:

- .1 A total of 59 ships were detained, in which 28.57% of them were CIC-topic related which means that in 21 cases the Navigation systems and equipment deficiencies, which were serious enough to detain the ship resulting a CIC-topic related detention rate of 2.14%.
- .2 A total of 245 non-compliances to the CIC topic requirements have been recorded as a direct result of this campaign. The overall average per cent of non-conformities was 2.68.
- .3 A total 180 questionnaires had at least one non-compliant response, which resulted 18.31% of CIC inspections not conforming with the requirements set out in questionnaire.
- .4 The requirements that reported the most favourable results related to the ship's Automatic Identification System transmitting correct particulars Q7 (0.5%); demonstration of the watch keeping officers familiarization with ECDIS Q4 (0.6%); and whether the second and/or third stage remote audible alarm of BNWAS recognized: Q6 (0.9%).
- .5 The most un-favourable results are questions 11, 8 and 5, which asked whether the exhibition of navigation/signal lights in accordance with the requirements of COLREG72 (7.63%); whether passage plan covering the whole voyage (6.2%) and ship's VDR/SVDR record data fully (2.9%).
- .6 A total of 159 (64.9%) non conformities out of 245 total non-conformities due to Q11: 75 (30.6%); Q8: 61 (24.9%) and Q5 : 23 (9.4%).
- .7 A total of 358 (36.42%) CIC inspections concerned general cargo/multi-purpose ships, followed by bulk carriers with 333 (33.88%) inspections, oil tankers with 130 (13.22%) inspections and chemical tankers with 72 (7.32%) inspections, which comprises 821 (83.51%) total CIC inspections.
- .8 A total of 13 (61.9%) ships detained for CIC-related deficiencies were general cargo/multipurpose ships, followed by bulk carriers 4 (19.05%) detentions and Ro-Ro Cargo ships with 2 (9.52%) detentions, which comprises 19 (90.48%)
- .9 By ship age, ships under 15 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, reported the least favourable results. Although they comprised only 20.14% of all inspections, they accounted for 52.38% of total detentions and 40.00% of non-conformities. The detention rate per inspection was 8.70% for ships 30 to 34 years old and 3.88% for ships over 35 years old.
- .11 A total of 12 flags had CIC-related detention. These flags cover 55.65% of the inspections. The flags, with the highest CIC-related detention rate were Sierra Leone (13.04%); Moldova (10.53%); Comoros (5.56%) and Cook Islands (5.56%) which cover 7.9% of the total number of CIC inspections 33.3% CIC-related detentions.
- .12 A total of 21 flags, which cover 9.76% of the total CIC inspections, had no non-conformities. When compared by ship flag, Greece, Bahama and Italy showed best results because with 25; 18 and 15 CIC questionnaire recorded without any non-compliance to the CIC topic requirements.
- .13 Breakdown of major non-conformities as indicated by “NO” responses have been studied by ship flag, ship type and ship age presented in **Section 3.7**

## 2.2 Conclusions

High CIC topic related detention rate, CIC inspections with non-conformities, unfavourable results to the questions 11, 8 and 5 raise concern industry level of compliance to the SOLAS Chapter V in particular overall status of the vessel’s navigation safety.

## 2.3 Recommendations

Non-compliance or inadequacy of the exhibition of navigation/signal lights in accordance with the requirements of COLREG72 is a significant potential danger to the vessel itself and overall safety.

High rate of non-compliances observed on board ships 25 years and older indicates a potential risk.

Thereby it is recommended:

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 and age, to be submitted IMO III Sub-committee 5<sup>th</sup> session.
2. PSC Officers should be instructed to submit CIC Questionnaire for each initial PSC inspection during the campaign, and;
3. Continue to put emphasis on the vital requirements of the SOLAS when performing PSC inspections, particularly the requirements that raised the most concern in the CIC.
  - a. lack of proper exhibition of navigation/signal lights in accordance with the requirements of COLREG72: Q11: 75 (30.6%)
  - b. lack of the passage plan cover the whole voyage: Q8: 61 (24.9%);
  - c. ship’s VDR/SVDR not record data fully: Q5: 23 (9.4%).

### 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 with CIC Questionnaire	No. of inspections with a CIC questionnaire	No. of inspections without CIC questionnaire
Total	983	983	303
Total number of detentions	59	59	12
Detentions with CIC-topic deficiencies	21	21	N/A

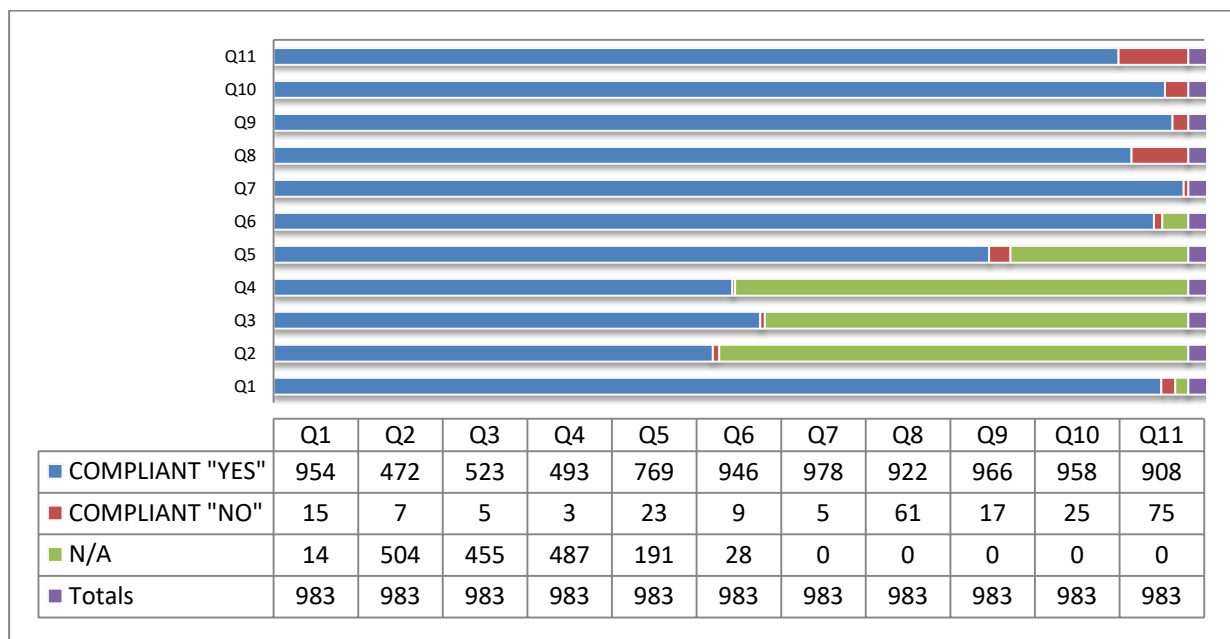
Looking at the number of inspections performed with a CIC questionnaire (Column 2&3 of Table 1), there is 59 detentions during CIC inspections and 21 (35.59%) of these detentions were CIC topic related. Questionnaire submission rate was 76.44% which around three out of four initial inspections were accompanied with a CIC questionnaire.

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

#### 3.2 Analysis of the response to the CIC questionnaire

The responses to the questionnaire presented in Figure 1. The number of responses for each of the 11 CIC questions broken down by type of answer indicating compliance to the requirements and applicability of the requirements. Due to the data validity and recording procedures no blank responses exist.

**Figure 1** Responses for each of the 11 questions compliance to the requirements



**Table 2** presents 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 compliances to the requirement presented in the last column of the **Table 2**.



It indicates that the requirements that reported the most favourable results related to the ship's Automatic Identification System transmitting correct particulars Q7 (0.51%); demonstration of the watch keeping officers familiarization with ECDIS Q4 (0.6%); and whether the second and/or third stage remote audible alarm of BNWAS recognized: Q6 (0.94%).

The CIC questionnaire indicate that "unsatisfactory" answer was given to a question on 2.38% of occasions. It is average per cent of unsatisfactory responses indicating overall compliance of the requirements. Number of "YES" responses to the Question 12 coincides with the recorded CIC topic related detentions as a result of an observed non-conformity ("NO" response) to any of the questions (1-11) in the questionnaire.

Breakdown CIC inspections, inspections with non-conformities to the requirements set out in the questionnaire questions 1-11, 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 3.3 - Section 3.6**. Breakdown of the major non-conformities by ship flag, ship type and ship age are presented in **Section 3.7**.

**Table 2** Responses CIC Questionnaire on CIC on Safety of Navigation <sup>(1)</sup>

Nr.	Questions	YES Nr.	NO Nr.	Total Nr. of applicable responses	Compliance	
					YES %	NO %
1	Is ship's navigation equipment in accordance with its applicable safety certificate (SEC, PSSC, CSSC)?	954	15	969	98.45	1.55
2	Does the ECDIS have the appropriate electronic charts for the intended voyage and is there a suitable back-up arrangement?	472	7	479	98.54	1.46
3	Is there evidence that all watch keeping officers comply with STCW requirements for ECDIS?	523	5	528	99.05	0.95
4	Can watch keeping officers demonstrate familiarization with ECDIS?	493	3	496	99.40	0.60
5	Can ship's VDR/SVDR record data fully?	769	23	792	97.10	2.90
6	Is second and/or third stage remote audible alarm of BNWAS recognized?	946	9	955	99.06	0.94
7	Is the ship's Automatic Identification System transmitting correct particulars?	978	5	983	99.49	0.51
8	Does the passage plan cover the whole voyage?	922	61	983	93.79	6.21
9	Does all crew know and respect the official working language as established and recorded in the ship's logbook?	966	17	983	98.27	1.73
10	Is the crew familiar with the procedure of emergency operation of steering gear?	958	25	983	97.46	2.54
11	Are the exhibition of navigation/signal lights in accordance with the requirements of COLREG72?	908	75	983	92.37	7.63
	<b>TOTAL</b>	<b>8889</b>	<b>245</b>	<b>9134</b>	97.32	2.68
12	Was the ship detained as a result of this CIC?	<b>21</b>	<b>962</b>	<b>983</b>	2.14	97.86

<sup>(1)</sup> Includes Bulgaria and Romania data which are submitted also to the Paris MOU. The Russian Federation and Turkey data includes only Black Sea ports

### 3.3 Analyses by Ship types

When considering the breakdown of ships inspected by ship type, presented in **Table 3**, largest group of the ship inspected during campaign period were general cargo/multi-purpose ships with 421 (36.74%) inspections followed by bulk carrier with 399 (34.82%) inspections and oil tanker with 112 (9.77%) inspections.

358 (36.42%) CIC inspections concerned general cargo/multi-purpose ships, followed by bulk carriers with 333 (33.88%) inspections, oil tankers with 130 (13.22%) inspections and chemical tankers with 72 (7.32%) inspections, which comprises 821 (83.51%) total CIC inspections.

Majority of inspection with non-conformities observed were general cargo/multi-purpose ship with 102 (56.7%) inspections, bulk carriers with 48 (13.69%). Although they constituted only 81.32% of all inspections they accounted for 85.71% of CIC-topic related detentions and 88.09% of related non-conformities.

13 (61.9%) of the ships detained for CIC-related deficiencies were general cargo/multipurpose ships, followed by bulk carriers 4 (19.05%) detentions and Ro-Ro Cargo ships with 2 (9.52%) detentions, which comprises 19 (90.48%) CIC topic related detentions.

**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	% CIC topic related detentions
Bulk carrier	333	48	14.41	3242	59	1.82	24.08	4	1.20
Chemical tanker	72	7	9.72	783	8	1.02	3.27	1	1.39
Commercial yacht	1	1	100.00	6	2	33.33	0.82	0	0.00
Container	22	3	13.64	214	3	1.40	1.22	0	0.00
Gas carrier	13	1	7.69	133	1	0.75	0.41	0	0.00
General cargo/multipurpose	358	102	28.49	2886	142	4.92	57.96	13	3.63
Livestock carrier	7	3	42.86	50	3	6.00	1.22	0	0.00
Offshore supply	5	2	40.00	48	5	10.42	2.04	0	0.00
Oil tanker	130	4	3.08	1415	5	0.35	2.04	1	0.77
Other special activities	2	1	50.00	18	2	11.11	0.82	0	0.00
Ro-Ro cargo	23	5	21.74	187	10	5.35	4.08	2	8.70
Ro-Ro passenger ship	7	2	28.57	71	3	4.23	1.22	0	0.00
Tugboat	6	1	16.67	40	2	5.00	0.82	0	0.00
Others	4	0	0.00	41	0	0.00	0.00	0	0.00
<b>TOTAL</b>	<b>983</b>	<b>180</b>	<b>18.31</b>	<b>9134</b>	<b>245</b>	<b>2.68</b>	<b>100.00</b>	<b>21</b>	<b>2.14</b>

### 3.4 Analyses by ship age

By ship age, ships under 15 years reported the most favourable results but the situation worsened as the age of ships increased.

Older ships, particularly those 30 years and older, show reason for concern with majority of detentions 11 (52.4%) and non-conformities 98 (40.0%), although subjecting minority of inspections 241 (21.29%). The detention rate per inspection was 8.70% for ships 30 to 34 years old and 3.88% for ships over 35 years old.

**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	% CIC topic related detentions
0-5	150	15	10.00	1604	18	1.12	7.35	1	0.67
6-10	247	24	9.72	2458	31	1.26	12.65	1	0.40
11-15	169	20	11.83	1640	28	1.71	11.43	0	0.00
16-20	103	20	19.42	953	23	2.41	9.39	4	3.88
21-24	61	18	29.51	520	23	4.42	9.39	2	3.28
25-29	55	17	30.91	441	24	5.44	9.80	2	3.64
30-34	69	23	33.33	529	33	6.24	13.47	6	8.70
35+	129	43	33.33	989	65	6.57	26.53	5	3.88
<b>Totals</b>	<b>983</b>	<b>180</b>	<b>18.31</b>	<b>9134</b>	<b>245</b>	<b>2.68</b>	<b>100.00</b>	<b>21</b>	<b>2.14</b>

### 3.5 Analyses by ship flag

The following Table 5 presents the results of the CIC in accordance by ship flag. A total of 983 individual ships from 55 flag administration subjected CIC inspection during the campaign.

Most inspections were carried out on board ships flying the flags of Panama with 147 (14.95%) inspections, Malta with 109 (11.08%) inspections, Liberia with 74 (7.53%) inspections and Turkey with 70 (7.12%) inspections.

**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	% CIC topic related detentions
Antigua and Barbuda	20	3	15.00	178	3	1.69	1.22	0	0.00
Belize	16	4	25.00	126	5	3.97	2.04	0	0.00
Comoros	18	6	33.33	139	14	10.07	5.71	1	5.56
Cook Islands	18	7	38.89	144	12	8.33	4.90	1	5.56
Hong Kong. China	30	2	6.67	323	2	0.62	0.82	0	0.00
Liberia	74	7	9.46	752	8	1.06	3.27	0	0.00
Malta	109	11	10.09	1082	14	1.29	5.71	1	0.92
Marshall Islands	94	10	10.64	953	12	1.26	4.90	1	1.06
Moldova. Republic of	19	5	26.32	147	9	6.12	3.67	2	10.53
Netherlands	23	1	4.35	237	2	0.84	0.82	0	0.00
Palau	14	6	42.86	110	8	7.27	3.27	0	0.00
Panama	147	36	24.49	1284	45	3.50	18.37	7	4.76
Russian Federation	40	9	22.50	360	16	4.44	6.53	1	2.50
Sierra Leone	23	12	52.17	180	17	9.44	6.94	3	13.04
Singapore	34	4	11.76	355	4	1.13	1.63	0	0.00
Tanzania United Republic of	39	12	30.77	301	14	4.65	5.71	1	2.56
Togo	30	10	33.33	236	15	6.36	6.12	1	3.33
Turkey	70	11	15.71	600	13	2.17	5.31	0	0.00
Others	165	24	14.55	1627	12	0.74	4.90	2	1.21
<b>Totals</b>	<b>983</b>	<b>180</b>	<b>18.31</b>	<b>9134</b>	<b>245</b>	<b>2.68</b>	<b>100.0</b>	<b>21</b>	<b>2.14</b>

A total of 12 flags had CIC-topic related detentions. These flags cover 55.65% of the CIC inspections.

The flags with more than 10 inspections with the highest CIC-related detention rate were Sierra Leone (13.04%); Moldova (10.53%) followed by Cook Islands and Comoros (5.56%) each which cover 4.9% of the total number of CIC inspections and 50.0% CIC-related detentions.

A total of 21 flags, with 96 (9.8%) of the total inspections, had no non-conformities. When compared by ship flag, Greece, Bahama and Italy showed best results because with 25; 18 and 15 CIC questionnaires recorded without any non-compliance to the CIC topic requirements.

### 3.6 Analyses by ship risk group

**Table 6** presents CIC data by ship risk group indicates that higher risk ships have consistently attracted more non-compliant responses and detentions per inspection than lower risk ships is considered to be validation of the BS MOU ship risk profile system to identify sub-standard vessels for inspection.

HRS and SRS comprised the total number of detentions 21 (100.0%) and majority of non-compliances 92 (5.99%) and 143 (63.6%), and high per cent of average non-compliance per applicable question 5.99% and 2.32% respectively.

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

SHIP RISK PROFILE	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
<b>HRS</b>	195	64	32.82	1536	92	5.99	37.55	9	4.62
<b>SRS</b>	646	107	16.56	6157	143	2.32	58.37	12	1.86
<b>LRS</b>	141	9	6.38	1430	10	0.70	4.08	0	0.00
<b>UNKOWN</b>	1	0	0.00	11	0	0.00	0.00	0	0.00
<b>Totals</b>	<b>983</b>	<b>180</b>	<b>18.31</b>	<b>9134</b>	<b>245</b>	<b>2.68</b>	<b>100.00</b>	<b>21</b>	<b>2.14</b>

### 3.7 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 are presented below for Questions 11, 8 and 5; with 75 (30.6%), 61 (24.89%) and 21 (8.57%) unsatisfactory responses.

**Question 11**, which asked whether or not the exhibition of navigation/signal lights in accordance with the requirements of COLREG72; recorded the highest per cent of unsatisfactory responses of the questionnaire. Of 983 inspections 75 were unsatisfactory in this area. This represents 7.63% of questionnaire and 30.61% of the total unsatisfactory responses. Breakdown of the compliance to the **Question 11** by ship flag, ship type and ship age are presented below.

43 (57.3%) of unsatisfactory responses to this question observed on board of ships flying five flag States. 32 (42.7%) unsatisfactory responses spreads over ships flying other flags. High non-compliant rate observed on board ship flag Sierra Leone 30.43%; Palau 21.43%, and Cook Islands 16.67%.

Ship Flag	Nr. of CIC inspections	Nr. of non-compliances	% total non-compliances	Non-compliant ratex100
Belize	16	2	2.67	12.50
Comoros	18	1	1.33	5.56
Cook Islands	18	3	4.00	16.67
Liberia	74	6	8.00	8.11
Malta	109	2	2.67	1.83
Marshall Islands	94	5	6.67	5.32
Moldova, Republic of	19	2	2.67	10.53
Palau	14	3	4.00	21.43
Panama	147	19	25.33	12.93
Russian Federation	40	2	2.67	5.00
Sierra Leone	23	7	9.33	30.43
Singapore	34	2	2.67	5.88
Tanzania, United Republic of	39	1	1.33	2.56
Togo	30	3	4.00	10.00
Turkey	70	6	8.00	8.57
Others	238	11	14.67	4.62
<b>Totals</b>	<b>983</b>	<b>75</b>	<b>100.00</b>	<b>7.63</b>

71 (94.7%) of unsatisfactory responses in this area observed on boards four ships types presented below. High non-compliant response ro-ro cargo ship, general cargo/multipurpose ships and bulk carrier with inspection more than 10 raise concern.

Ship Type	Nr. of CIC inspections	Nr. of non-compliances	% total non-compliances	Non-compliant ratex100
Bulk carrier	333	26	34.67	7.81
Chemical tanker	72	3	4.00	4.17
Container	22	1	1.33	4.55
General cargo/multipurpose	358	39	52.00	10.89
Offshore supply	5	1	1.33	20.00
Oil tanker	130	1	1.33	0.77
Ro-Ro cargo	23	3	4.00	13.04
Ro-Ro passenger ship	7	1	1.33	14.29
Others	33	0	0.00	0.00
<b>Totals</b>	<b>983</b>	<b>75</b>	<b>100.00</b>	<b>7.63</b>

55 (32.74%) of unsatisfactory responses to this question observed on board ships 16-34 years. Records related to safety of navigation compliant with the requirements on board younger ships up to 15 years old non-compliance rates are lower.

Ship Age	Nr. of CIC inspections	Nr. of non-compliances	% total non-compliances	Non-compliant ratex100
0-5	150	6	8.00	4.00
6-10	247	12	16.00	4.86
11-15	169	10	13.33	5.92
16-20	103	12	16.00	11.65
21-24	61	10	13.33	16.39
25-29	55	6	8.00	10.91
30-34	69	10	13.33	14.49
35+	129	9	12.00	6.98
<b>Totals</b>	<b>983</b>	<b>75</b>	<b>100.00</b>	<b>7.63</b>

**Question 8** was asked whether the passage plan cover the whole voyage, recorded the second highest number of unsatisfactory results. Out of 245 unsatisfactory 61 were unsatisfactory in this area. This represents 6.2% of CIC inspections. Breakdown of the compliance to the **Question 8** by ship flag, ship type and ship age are presented below.

High rate non-compliant response to question 8 observed on board of ships flying Tanzania, Sierra Leone and Togo.

Ship Flag	Nr. of CIC inspections	Nr. of non-compliances	% total non-compliances	Non-compliant ratex100
Comoros	18	3	4.92	16.67
Cook Islands	18	3	4.92	16.67
Malta	109	3	4.92	2.75
Marshall Islands	94	1	1.64	1.06
Moldova. Republic of	19	2	3.28	10.53
Netherlands	23	1	1.64	4.35
Palau	14	3	4.92	21.43
Panama	147	10	16.39	6.80
Russian Federation	40	6	9.84	15.00
Sierra Leone	23	4	6.56	17.39
Tanzania. United Republic of	39	7	11.48	17.95
Togo	30	5	8.20	16.67
Turkey	70	4	6.56	5.71
Others	339	9	14.75	2.65
<b>Totals</b>	<b>983</b>	<b>61</b>	<b>100.00</b>	<b>6.21</b>

Total 61 unsatisfactory responses to the Question 8 observed on board four ship types is indicated below. Ro-ro cargo ships and General cargo/multipurpose least favourable leading with high rate of non-compliant responses.

Ship Type	Nr. of CIC inspections	Nr. of non-compliances	% total non-compliances	Non-compliant ratex100
Bulk carrier	333	8	13.11	2.40
Chemical tanker	72	2	3.28	2.78
Commercial yacht	1	1	1.64	100.00
Gas carrier	13	1	1.64	7.69
General cargo/multipurpose	358	41	67.21	11.45
Livestock carrier	7	3	4.92	42.86
Offshore supply	5	1	1.64	20.00
Other special activities	2	1	1.64	50.00
Ro-Ro cargo	23	2	3.28	8.70
Ro-Ro passenger ship	7	1	1.64	14.29
Others	162	0	0.00	0.00
<b>Totals</b>	<b>983</b>	<b>61</b>	<b>100.00</b>	<b>6.21</b>

Breakdown of the non-compliance to question 8 by ship age are presented below. 41 (67.27%) of unsatisfactory responses to this questions observed on board ships 20 years and older with an average non-compliant rate of 16.20%.

Ship Age	Nr. of CIC inspections	Nr. of non-compliances	% total non-compliances	Non-compliant ratex100
0-5	150	3	4.92	2.00
6-10	247	5	8.20	2.02
11-15	169	5	8.20	2.96
16-20	103	3	4.92	2.91
21-24	61	4	6.56	6.56
25-29	55	9	14.75	16.36
30-34	69	11	18.03	15.94
35+	129	21	34.43	16.28
<b>TOTAL</b>	<b>983</b>	<b>61</b>	<b>100.00</b>	<b>6.21</b>

The results for **Question 5** which asked whether ship's VDR/SVDR can record data fully also raises concern and account for the third highest number of unsatisfactory result in this area which represent 2.90% of applicable CIC inspections. Breakdown of the compliance to the **Question 5** by ship flag, ship type and ship age are presented below:

Ship Flag	Nr. of CIC inspections	Nr. of non-compliances	% total non-compliances	Non-compliant ratex100
Antigua and Barbuda	13	1	4.35	7.69
Cook Islands	12	2	8.70	16.67
Hong Kong, China	30	1	4.35	3.33
Malta	102	3	13.04	2.94
Marshall Islands	92	3	13.04	3.26
Panama	117	5	21.74	4.27
Sierra Leone	13	1	4.35	7.69
Turkey	48	1	4.35	2.08
Others	365	6	26.09	1.64
<b>Totals</b>	<b>792</b>	<b>23</b>	<b>100.00</b>	<b>2.90</b>

Ship Type	Nr. of CIC inspections	Nr. of non-compliances	% total non-compliances	Non-compliant ratex100
Bulk carrier	327	9	39.13	2.75
Chemical tanker	70	1	4.35	1.43
Container	22	1	4.35	4.55
General cargo/multipurpose	199	10	43.48	5.03
Ro-Ro cargo	20	1	4.35	5.00
Tugboat	1	1	4.35	100.00
Others	153	0	0.00	0.00
<b>Totals</b>	<b>792</b>	<b>23</b>	<b>100.00</b>	<b>2.90</b>

Ship Age	Nr. of CIC inspections	Nr. of non-compliances	% total non-compliances	Non-compliant ratex100
0-5	142	2	8.70	1.41
6-10	233	6	26.09	2.58
11-15	153	2	8.70	1.31
16-20	92	3	13.04	3.26
21-24	48	4	17.39	8.33
25-29	36	2	8.70	5.56
30-34	33	2	8.70	6.06
35+	55	2	8.70	3.64
<b>Totals</b>	<b>792</b>	<b>23</b>	<b>100.00</b>	<b>2.90</b>