

Title: Passenger ship in single voyage as cargo ship

What happened

A managed vessel left the shipyard for repositioning to another EU port in order to complete the repairs works in a new shipyard.

During the period in the shipyard, (from October '17 to March '18), the ship was declared "under repair" in agreement with the Class (no official lay-up status); SMC and ISSC valid, with intermediate verification range date 06/03/2018 -06/09/2018; manning reduced for the repair period.

With the agreement of the Flag Administration, the Class issued the following certificates, valid for the single voyage to final repair shipyard:

- Cargo Ship Safety Construction Certificate;
- Record of Equipment for Cargo Ship Safety Radio;
- Cargo Ship Safety Equipment Certificate;
- Record of Equipment for Cargo Ship Safety;

It appears that neither the ISM RO / RSO (not the same Classification Body of the ship) nor the Flag Administration have consulted with regard to the status of the existing SMC and ISSC (in theory valid only as Passenger Ship but not for Other Cargo Ship).

However the single voyage for repositioning was completed successfully, but the discrepancy relevant to the ship type in the certificates could have been raised by the PSC with possible consequences for the ship and the Company .

Investigation of root causes/contributory factors

It appears that the Company was unaware of the details of the agreement between shipowner and Class about the ship certification for the single voyage.

It's reasonable to believe that being the ISM RO / ISPS RSO (Rina) different from the ship Classification Body (DNV), the matter relevant to the different ship type in the SMC and ISSC was not properly considered.

During the repairs period, the ship was in a *hybrid context*, (most of SMS activities discontinued by the crew due to the reduced manning and repairs; no cold or hot lay-up status defined; SMC and ISSC not suspended (BMA Tech. Bulletin 122).

There was no evidence of a documented risk assessment or MOC process conducted by the Fleet Cell for the *hybrid context* of the ship repairs and the single voyage certification.

It's worth reminding that:

- 1) The ship types listed on DOCs and SMCs shall be consistent with the specific ship types defined in SOLAS and on pertinent SOLAS documentation aboard ship.
- 2) The ship types listed on DOCs and SMCs shall be consistent with the service in which the ship operates.

It's always good practice to keep all parties (Class, Flag Administration, ISM RO, ISPS RSO) duly informed about the status of the ship and the intended voyage in order to ensure that all requirements are fulfilled.

Proposed Corrective/Preventive Actions

The Company:

- This Case Study will be distributed to fleet cells as lesson learned
- A dedicated risk assessment (GEN) for single-voyage will be produced for future reference
- Fleet cells (and MSQ) to revisit the ISM/ISPS requirements for ship in lay-up (or under repairs) in Appendix A

Reference

Appendix A

ISM

If the vessel is laid-up for more than 3 months the Safety Management Certificate (SMC) will be suspended and a reactivation audit should be performed upon the recommissioning. If a renewal or an intermediate verification audit falls due (but not overdue) during the period of out of service, or the date of re-activation falls within the window of one of these periodical audits, the re-activation audit will have the scope of periodical audit and the SMC will be endorsed accordingly. If the vessel is laid-up for more than 12 months the SMC will become invalid. An Interim verification audit will be required upon recommissioning. The ship will be issued an Interim SMC. These instructions should be applied in absence of any special requirements from the Flag Administration.

ISPS

If the International Ship Security Certificate (ISSC) is still valid when the ship is re-commissioned the shipowner has to contact the Flag Administration for instruction on both the Ship Security Plan (SSP) and the Certificate. If the International Ship Security Certificate (ISSC) is not valid when the ship is re-commissioned an SSP approval will be carried out and a Plan Approval Letter (PAL) will be issued. An Interim verification audit as required by ISPS Code will be carried out and an Interim ISSC will be issued. These instructions should be applied in absence of any other requirements from the Flag Administration.

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