

---

# No.17 Reporting on deficiencies possibly affecting the implementation of the ISM Code on board

(Rev.0  
July 2009)

(Rev.1  
Sept 2016)

(Rev.2  
Oct 2020)

## INTRODUCTION

The purpose of this Procedural Requirement is to ensure that the Organisation responsible for the SMS audit of the ship and the flag Administration, as appropriate, are notified when deficiencies possibly affecting the implementation of the ISM Code on board are identified by a surveyor.

### 1. SCOPE AND APPLICATION

1.1 This document describes the procedure for reporting on deficiencies possibly affecting the implementation of the ISM Code on board during class and statutory visits and the subsequent action to be taken.

1.2 This procedure applies to all Classification Societies certified to QSCS.

### 2. DEFINITIONS

2.1 "International Safety Management (ISM) Code" means the International Management Code for the Safe Operation of Ships and for Pollution Prevention.

2.2 "Document of Compliance" (DOC) means a document issued to a Company that complies with the requirements of the ISM Code.

2.3 "Safety Management Certificate" (SMC) means a document issued to a ship which signifies that the company and its shipboard management operate in accordance with the approved safety management system.

2.4 "Safety Management System" (SMS) means a structured and documented system enabling Company personnel to implement effectively the company's safety and environmental protection policy.

2.5 "Deficiency" means a defect in, or a failure in the operation of the ship, a part of the ship's structure or its machinery, equipment, fittings, or a failure in the documentation.

2.6 "Report" means the documentation completed by the surveyor containing as a minimum the information shown in Annex 1. The report may be in any format decided by the Classification Society.

---

#### Note:

1. This Procedural Requirement applies from 1 July 2009.
2. Rev.1 of this Procedural Requirement applies from 1 January 2017.
3. Rev.2 of this Procedural Requirement applies from 1 January 2021.

**No.17**  
(cont)

2.7 “Leading indicator” means a measure preceding or indicating a future event used to drive and measure activities carried out to prevent and control injury, or damage to property or the environment.

2.8 “Surveyor” means, for the purpose of this PR, anybody attending on board for class or statutory purposes other than an ISM audit.

**3. WHEN TO COMPLETE THE REPORT**

3.1 When deficiencies possibly affecting the implementation of the ISM Code on board are identified by the surveyor during a periodical (Annual/Intermediate/Special) Class Survey or occasional Class Survey, Statutory Surveys, additional surveys relevant to Port State Control, Flag State Inspections or any other occasion, a Report is to be completed by the surveyor.

3.2 The Classification Society shall internally document implementation of PR17, regardless if deficiencies have been found (for example “Deficiencies reported under PR17: Yes/No”).

**4. WHAT TO REPORT**

4.1 The following shall be reported by the surveyor:

- i) deficiencies relating to technical conditions, combination of which indicate that the maintenance procedures specified in the SMS documentation may not be effectively implemented (Technical deficiencies);
- ii) deficiencies caused by deviation from operational requirements (Operational deficiencies);
- iii) deficiencies relating to deviation from requirements for documentation and reporting (Documentation deficiencies);
- iv) other deficiencies which may seriously affect the safety of ship, personnel or the environment (Other deficiencies).

See Annex 2 for examples.

4.2 The following shall not be reported by the surveyor:

- i) technical deficiencies, which are considered normal wear and tear for the ship type and age;
- ii) deficiencies which have already been identified by the Company or the crew, reported as appropriate, and are being dealt with adequately by the Company including the personnel working on board.

4.3 The report need not be issued when:

- i) at surveys/attendance resulting from Port State or Flag State detentions there is evidence available that the organisation responsible for the SMS audit of the ship has been notified and is also required to carry out an additional ISM audit;

**No.17**  
(cont)

- ii) an auditor from the organisation, responsible for the SMS audit of the ship is present on board performing an audit and a surveyor has communicated the deficiencies directly to the auditor. This shall be documented.

**5. REPORTING AND FOLLOW UP**

5.1 The surveyor shall make the report available to the master or Company representative and advise that it may be submitted to the organization responsible for the SMS audit of the ship as specified in the Continuous Synopsis Record

5.2 The report shall be submitted to the responsible department within the surveyor's Classification Society for review.

5.3 When the responsible department within the surveyor's Classification Society assesses that the reported deficiencies are not affecting the implementation of the ISM Code on board, the report is to be filed.

5.4 When the responsible department within the surveyor's Classification Society assesses that the reported deficiencies are possibly affecting the implementation of the ISM Code on board, the report shall be sent within 10 working days from the date when the report is received to either:

- a. the Classification Society that acts as the Recognised Organisation (hereinunder referred to as the Responsible Organisation) and to the flag Administration of the ship if specifically required and in accordance with the flag Administration requirements. The contact details of the Responsible Organisation can be found on the IACS website: [www.iacs.org.uk](http://www.iacs.org.uk), located under: PR17 and PR18 Contact Details, or
- b. the flag Administration, if the SMS was audited by the flag Administration or an organisation other than a Classification Society acting as a Recognized Organisation in 5.4 a.

If for any reason the report is not sent within 10 working days of receipt, the Classification Society shall document reasons for the delay.

5.5 The Responsible Organisation shall review the report and finally judge whether the reported deficiencies are possibly affecting the implementation of the ISM Code on board. When it is adjudged that the reported deficiencies are possibly affecting the ISM implementation, decision on what action, if any, should be taken.

5.6 If deemed appropriate the report may be forwarded by the Responsible Organisation to the Recognized Organisation that has audited the Company for the issuance of DOC for their review and follow up.

5.7 The flag Administration shall be kept informed if specifically required and in accordance with flag Administration requirements.

5.8 Reports judged as possibly affecting the implementation of the ISM Code on board should be collected in a database which each Responsible Organisation should establish and maintain. The database may also include other data collected by the Responsible Organisation.

**No.17**  
(cont)

5.9 Following Responsible Organisation's internal procedures, reports should be analysed with a view to derive leading indicators. The leading indicators identified by the Responsible Organisation may be used as target areas for audits.

## **No.17 Annex 1- Minimum contents of the Report on deficiencies possibly affecting the implementation of the ISM Code on board**

(cont)

The report shall have a title.

1. Identification of ship:
  - IMO number
  - Ship's name
  - Flag
2. Identification of Survey/Attendance
3. Identification of SMC and DOC issuer:
  - Organisation responsible for the SMS audit of the ship as specified in the Continuous Synopsis Record
  - Issuer of the DOC
4. Category of deficiency:
  - Technical
  - Operational
  - Documentation
  - Other
5. Details of deficiency

## No.17 Annex 2 - Guidance for what to report

(cont)

Category of deficiency	Examples
<b>Technical deficiencies</b>	<ul style="list-style-type: none"> <li>• Poor condition of hull, main deck, closing appliances, railings, ladders.</li> <li>• Defective/missing fire fighting and life saving appliances, oil pollution prevention equipment.</li> <li>• Leaks and oil in E/R spaces, pump-rooms, etc.</li> <li>• Deficiencies relating to technical conditions which may lead to the limitation, suspension or withdrawal of a Class or Statutory Certificate.</li> </ul>
<b>Operational deficiencies</b>	<ul style="list-style-type: none"> <li>• Accidents and hazardous occurrences not reported to the Company.</li> <li>• Crew not able to satisfactorily conduct practical demonstrations of shipboard operations, such as starting the fire pump, emergency generator, lifeboat engine, etc.</li> <li>• Crew not able to communicate effectively in the execution of their duties.</li> <li>• Inability of crew to perform satisfactorily mandatory drills such as fire drills, LSA drills, pollution prevention drills, etc.</li> </ul>
<b>Documentation deficiencies</b>	<ul style="list-style-type: none"> <li>• Expired classification or statutory certificates or certificates not endorsed as required.</li> <li>• Overdue surveys, overdue audits or overdue conditions of class.</li> <li>• Ship's copy of Document of Compliance (DOC) not valid or not relevant to ship type.</li> <li>• Original Safety Management Certificate (SMC) has incorrect data or endorsements missing.</li> <li>• Emergency response plans and relevant SOPEP manual not available (contact points ashore should be current and corresponding with Company name/address on DOC and SMC).</li> <li>• Entries for relevant drills etc. in Log Book not completed in accordance with mandatory requirements.</li> <li>• Incorrect or missing entries in the Oil Record Book.</li> <li>• Fire Plan not up to date</li> </ul>
<b>Other deficiencies</b>	<ul style="list-style-type: none"> <li>• Ship's complement not complying with the Minimum Safe Manning Certificate.</li> <li>• Master, officers and ratings not certified as required by the STCW Convention.</li> <li>• Serious deficiencies in respect to housekeeping and maintenance of galley, crew accommodation and provisions stores.</li> <li>• Port State or Flag State detentions: if no evidence available, that the organisation responsible for the SMS audit of the ship as specified in the Continuous Synopsis Record has been notified.</li> </ul>

End of Document
-----------------