

**ROMANYA LİMANLARINDA TÜRK BAYRAKLI GEMİLERDE 2022-2025 YILLARI ARASINDA TESPİT EDİLEN EKSİKLİKLER**  
(Tutulma maddeleri Gri Renkli olarak verilmiştir)

| DENETİM LİMANI | DENETİM TARİHİ | NO | REFERANS             | EKSİKLİK   |
|----------------|----------------|----|----------------------|--|
| GALATI         | 30.03.2023     | 1  | MARPOL 19/I/R.17     | Sludge and bilge water discharge to shore facilities recorded under same code ( C 12.1 ). Master instructed to keep proper records from now on.                                    |
|                |                | 2  | SOLAS 83/III7R.7     | Man overboard lifebouy (PS) with ship's name not readable.   |
|                | 04.04.2023     | 1  | MLC /STD A 2.3       | Table of shipboard working arrangements missing information regarding minim hours of rest or maxim hours of work.  |
|                |                |    |                      |  |
| BRAILA         | 01.07.2022     | 1  | SOLAS 2005 /XI-1/R5  | CSR no 1 and 2 with form 2 and 3 missing.  |
|                |                |    |                      |  |
| CONSTANTA      | 16.03.2022     | 1  | SOLAS /CH. II-1/R.26 | Gauge from steering pump no. 2 missing.  |
|                |                | 2  | SOLAS 96 CHII-1/R.26 | Auxillary engine number 1 found with small quantity of oil leakage.  |
|                |                | 3  | MLC 2006 R 3.2.1     | Found several rotten fruits and vegetables.  |
|                |                | 4  | STCW PART A /PART 2  | Incomplete passage plan: no UKC available, passage plan not berth to berth (vessel berthed at Constanta S and passage plan was done for Constanta N).                              |
|                |                | 5  | SOLAS 1988 CIV/R.17  | GMDSS Radio log improper fill up. A summary of communication relating to distress, urgency and safety traffic not recording. Master instructed to keep proper records from now on. |
|                |                | 6  | MARPOL A V/R.10      | Insufficient storage capacity available on board for the category (A)-plastic, (B)-food waste, (C)-domestic waste.   |
|                |                | 7  | SOLAS C III/R.19     | Lack of rescue procedure   |
|                |                | 8  | MLC 2006/R. 4.3      | Several engine room flooring plates not properly secured.  |
|                |                | 9  | STCW PART A/ 4-1     | Compass error correction not recorded at least once per watch. Master instructed to. keep proper fill up from now on.  |
|                |                | 10 | MLC 2006 /R. 4.3     | Engine room dirty slippery floor.  |
|                | 07.05.2022     | 1  | SOLAS /CXI-1/R.5     | Form 2 and 3 missing from CSR No. 23 and 24.   |
|                |                | 2  | MARPOL /R.10         | Insufficient storage capacity available onboard for the categories A, B and C, according to the disposed amounts recorded in the GRB.  |

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|                   | <b>3</b>  | SOLAS /CH.II-1/R.3-4.2              | Emergency Towing Booklet has missing information for safe working loads (SWL) of the equipment, connection points and strong points.   |
|                   | <b>4</b>  | MLC /STD A2.3                       | Signed-off crew did not sign the work and rest hours sheet for the respective month. Master instructed to keep proper records from now on.   |
| <b>09.05.2022</b> | <b>1</b>  | ICLL /ARTICLE 15                    | Catwalk from cross bay rusted.   |
| <b>28.07.2022</b> | <b>1</b>  | STCW PART A/PART 2                  | Incomplete passage plan not berth to berth   |
|                   | <b>2</b>  | SOLAS 1988 AMEND /CH. IV/R.17       | GMDSS Radio log improper fill up. A summary of communication relating to distress, urgency and safety traffic not recording. Master instructed to keep proper records from now on.   |
|                   | <b>3</b>  | MLC 2006 / STD. A4.3                | Two aft mooring ropes in bad condition.  |
| <b>01.08.2022</b> | <b>1</b>  | SOLAS /C I/R. 12                    | Wrong entries in Form E: AIS search and rescue transmitters AIS-SART provided instead of Radar search and rescue transponders SART.  |
|                   | <b>2</b>  | SOLAS /CV/R.12                      | Spare magnetic compass found with consistent air bubbles.  |
|                   | <b>3</b>  | SOLAS 2001-2003 AMEND/CH.V /R.28    | The official deck logbook was found with incomplete records. (e.g incomplete details as such courses steered, speed and distances sailed and position fixings during the ship's maneuvering).  |
|                   | <b>4</b>  | SOLAS /CV R.27                      | NP 284 Admiralty List of Radio Signals Volume 4 - old edition.   |
|                   | <b>5</b>  | SOLAS /CH. V /R. 22                 | Bridge windows wipers are totally damage.  |
|                   | <b>6</b>  | SOLAS/CH. VI/R. 5-1                 | Material safety data sheets from the last bunkering 04.07.2022 missing.  |
|                   | <b>7</b>  | ICLL 1988 PROTOCOL/ AN.A/ARTICLE 15 | The main deck area and the hatch covers were found heavily corroded in several areas. Hydraulic deck oil line heavy corroded.  |
|                   | <b>8</b>  | MLC 2006/STD. A3.1                  | Ships air condition is inoperative. Accommodation overheated.  |
|                   | <b>9</b>  | SOLAS /CH. II-2/R.13                | Fire detection system under alarm zone 4.  |
|                   | <b>10</b> | SOLAS /CH. V/R. 12                  | Speed and distance measuring device inoperative  |
|                   | <b>11</b> | COLREG***/RULE 20                   | Main power of navigation lights (1) is Inoperative.  |
|                   | <b>12</b> | SOLAS/IX/PART A/1                   | Safety management audit by the Administration Is required before departure of the ship. Deficiencies marked ISM are objective evidence of a serious failure, or lack of effectiveness, of implementation of the ISM Code.                |
| <b>28.09.2022</b> | <b>1</b>  | STCW CODE PART A /PART 2            | Incomplete passage plan: no manual plotting position as per passage plan instructions, no abort point, no emergency anchorage area, no go area marked on the chart, no berth to berth passage plan.                                      |
|                   | <b>2</b>  | SOLAS/CH.IV/ R.17                   | GMDSS Radio log improper fill up. A summary of communication relating to distress, urgency and safety traffic not recording. Master instructed to keep proper records from now on.   |
|                   | <b>3</b>  | STCW /PART 4-1                      | Compass error correction not recorded at least once per watch. Master instructed to. keep proper fill up from now on.  |
|                   | <b>4</b>  | SOLAS /CH.V/R.28                    | The official log book was found with incomplete records e.g (incomplete detail as such courses steered, speed and distance sailed position fixings during the ships maneuverings). Master instructed to keep proper records from now on. |

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| 24.11.2022 | 5  | SOLAS/CH. III/R.19                     | Lack of rescue procedure.   |
|            | 6  | MLC 2006 THE R. AND THE CODE/STD. A2.3 | Records of seafarers' daily hours of work/rest for chief officer and 2nd engineer in 07.08.2022 at Fire Drill is not corresponding with ship activity.  |
|            | 7  | SOLAS /CH.II-1/R.3-4.2                 | From Emergency towing manual missing the bollards SWL.  |
|            | 8  | SOLAS IX/R.3<br>ISM CODE/PART A /1     | Deficiencies marked ISM are objective evidence of failure, or lack of effectiveness, of the implementation of the ISM Code. The ship will be eligible for re-inspection after 3 months from the final date of the report.                   |
|            | 1  | STCW CODE PART A/PART 2                | Incomplete passage plan: manual plotting position from Constanta anchorage area to Constanta berth not available as per passage plan instructions (at least one position every hour). Master instructed to keep proper records from now on. |
|            | 2  | SOLAS /CH.IV/R.17                      | GMDSS Radio log improper fill up. A summary of communication relating to distress not recording. Master instructed to keep proper records from now on.  |
|            | 3  | STCW/PART 4-1                          | Compass error correction not recorded at least once per watch. Master instructed to keep proper fill up from now on.  |
|            | 4  | SOLAS/ CH. III/R.9                     | Several IMO symbols deteriorated (around outside accommodation).  |
|            | 5  | MARPOL /AN V/R.10                      | insufficient storage capacity available on board for the category (F)-operational waste.  |
|            | 6  | MARPOL/VI/R.21                         | Ship Energy Efficiency Management plan has the old company name.  |
|            | 7  | SOLAS /CH.III/R.19                     | Lack of rescue procedure.   |
| 08.12.2022 | 8  | MLC /R. 2.1/STD. A2.1                  | 3RD ofTicer employment contract expired.  |
|            | 9  | SOLAS AMEND/IX/R.3                     | Deficiencies marked ISM are objective evidence of failure, or lack of effectiveness, of the implementation of the ISM Code. The ship will be eligible for re-inspection after 3 months from the final date of the report.                   |
|            | 10 | MLC STD. A4.3                          | One forward mooring rope in bad condition.  |
|            | 11 | MLC 2006/STD. A3.2                     | Provisions not properly stowed and segregated.  |
| 30.12.2022 | 1  | SOLAS /CH. V /R.28                     | The official log-book found with incomplete records (e.g. incomplete details as such courses steered, speed and distances sailed, position fixings during the ships maneuverings). Master instructed to keep proper records from now on.    |
|            | 2  | MLC 2006/STD. A4.3                     | In engine room found with slippery floors.  |
|            | 3  | SOLAS /CH.V/ R.34                      | Incomplete passage plan: method and intervals of plotting positions information missing.  |
|            | 4  | STCW /SEC. A-VIII/1                    | Drills performed in November recorded as rest time for some deck and engine crew.   |
| 30.12.2022 | 1  | MARPOL/AN. 1/PART I                    | Wrong records during bunkering, fuel recorded in kg instead of mt. Master/Chief Engineer instructed to keep proper records from now on.   |
|            | 2  | MLC 2006/STD. A4.3                     | Oily filters in galley, the last cleaning done three month ago.   |
|            | 3  | SOLAS/CH.VI/R. 5.1                     | Some chemicals on board without material safety data sheet (ex. ECC-19 air cooler cleaner).   |
|            | 4  | SOLAS/CH. IV /R.17                     | Not any communications relating to distress, urgency and safety traffic are recorded. Master instructed to keep proper records from now on.   |

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| 12.03.2023 | 1 | MLC 2006/STD. A3.1            | The flushing water system was found inoperative at the ship's public toilet from main deck. The sink from public toilet poop deck is broken.   |
|            | 2 | SOLAS/CH. III/R.9             | Operating instruction for rescue boats is not readable.  |
| 15.04.2023 | 1 | MARPOL /AN.V /R.10            | Untreated sewage rate of discharge table not available on board.   |
|            | 2 | SOLAS/CH. II-2 /R.14          | Poop deck inside accommodation self-closing fire door not properly closing.  |
| 21.06.2023 | 1 | STCW CODE PART A /PART4-1     | Procedure of handing over the bridge watch during sea passage not followed (ship position entry missing at handing over watch from Deck Log Book). Master instructed to keep proper records from now on.   |
|            | 2 | SOLAS CH. II-1/ REG.3-4.2     | Discrepancies found between SWL printed on the bollards (40 Tonnes) and SWL. stated in Emergency Towing Booklet (8 Tones)  |
|            | 3 | STCW                          | Chief officer watch from 0400-0800 not covered by other watch officer on 10,17, 23, 24 of May 2023   |
|            | 4 | SOLAS CH. III/REG.19          | Incomplete and incorrect fire-fighting equipment was used during the exercise (e.g.VHF was not used by fire fighting team to report situation inside affected area) and the fire-fighting procedure not properly followed, (e. gonly one fire fighter entered affected area the other one stayed outside the door) |
|            | 5 | MARPOL AN.1 PART I            | In Oil Record Book the sum of quantities bunkered in specific tanks are different that total quantity bunkered on 10 April 2023 and 01 June 2023   |
|            | 6 | SOLAS REG.3 ISM CODE PART A/1 | Deficiencies marked ISM are objective evidence of failure, or lack of" effectiveness, of the implementation of the ISM Code. The ship will be eligible for re-inspection after 3 months from the final date of the report  |
| 22.08.2023 | 1 | MLC/STD. A4.3                 | Two aft mooring rope in bad condition.   |
|            | 2 | SOLAS/CH III/R.9              | Several IMO symbols missing or deteriorated (around accommodation).  |
| 05.09.2023 | 1 | SOLAS /CH.II-2/R.7.3          | The function of fixed fire detection and fire alarm systems not periodically tested (CIC related).Master instructed to keep proper records from now on   |
|            | 2 | SOLAS /CH.IV/R.17             | Incomplete records (received distress, urgency, and safety messages missing).Master instructed to keep proper records from now on  |
|            | 3 | STCW/PART A/PART 4            | Standard compass error is not determined at least once a watch Master instructed to keep proper records from now on  |
| 30.09.2023 | 1 | MLC/STD.4.3                   | Two forward mooring lines and two aft mooring lines were found damaged.  |
|            | 2 | ICLL/REG.25                   | Bulwarks stay rusted port and starboard side in several areas.   |
|            | 3 | ICLL/REG.16                   | The driveway for Cargo hatch covers wheels for Cargo hold two rusted.  |
|            | 4 | MLC/STD. A4.3                 | Bilge found with traces of oil lealages.   |
|            | 5 | MLC/STD. A4.3                 | Hydraulic pipes for Cargo hatches rusted in several places.  |
| 15.11.2023 | 1 | MLC/STD. A3.2                 | Frozen vegetables mixed with plastic bags and boxes in the frozen vegetables freezer   |
|            | 2 | MARPOL/AN.I/P.1               | In Oil Record Book quantities of lube oil bunkered recorded in liters and Kg not in metric tones   |
|            | 3 | MARPOL/AN.V/R.10              | Location and storage capacity for category E (Incinerator Ash) information missing   |
|            | 4 | MLC/Title 3/Std. A3.2         | Daily log of food temperature (vegetable rooms, meat room and different freezers) last entry is 09.09.2023, Master instructed to keep proper records from now on   |
|            | 5 | SOLAS/ch.II-1/R.3-4.2         | Discrepancies found between SWL, printed on the bollards and SWL, stated in Emergency Towing Booklet.  |

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|            | 6 | SOLAS/R.9                         | No access control to ship - Master instructed to take action immediately according requirements   |
|            | 7 | SOLAS/R.3<br>ISM CODE/PART A/1    | Deficiencies marked ISM are objective evidence of failure, or lack of effectiveness, of the implementation of the ISM Code. The ship will be eligible for re-inspection after 3 months from the final date of the report  |
| 22.11.2023 | 1 | MLC/REG. 42./STD. A42.1           | Certificate or documentary evidence of financial security for repatriation not posted in a conspicuous place on board where it is available to the seafarers.   |
|            | 2 | MLC/ REG. 4.2/STD. A4.2.1         | Certificate or documentary evidence of financial security relating to shipowners liability not posted in a conspicuous place on board where it is available to the seafarers.   |
| 04.03.2024 | 1 | SOLAS /CH.V /R. 34                | Passage plan from Gemlik Turkey to Constanta Romania method and periods of plotting positions and UKC information missing.  |
|            | 2 | SOLAS CH. I / REG. 12             | In Record of equipment for the CSSR (form R) is stated the minimum persons required to operate radio installation is one(1) , in Minimum Safe manning certificate is stated two (2).  |
|            | 3 | MARPOL AN. V /R.10                | Storage capacity and location for all garbage categories not officially stated in Garbage management plan   |
|            | 4 | SOLAS CH.II-1 / REG. 3-4.2        | Discrepancy found between SWL listed in Emergency towing arrangements booklet and SWL printed on the bollards FWD and Aft station.  |
|            | 5 | STCW PART A/ PART 2               | Planned route from Constanta Pilot to Constanta Berth not printed on chart.   |
|            | 6 | SOLAS CH. III / REG. 20           | Lifeboat no 2 heavy starting on battery no 1  |
|            | 7 | SOLAS CH.III / REG. 19            | Incomplete and incorrect fire-fighting equipment was used during the exercise (e.g fireman VHF missing,, only one fireman entered the affected area) and the fire-fighting procedure not properly followed. (e.g electricity shut off, ventilation shut off fire flaps closing not performed) |
|            | 8 | MLC REG. 3.1                      | Flushing of toilet at main deck was found inoperative outstanding deficiency from PSC inpection on 24.11.2022   |
|            | 9 | SOLAS REG. 3<br>ISM CODE/PART A/1 | Deficiencies marked ISM are objective evidence of failure, or lack of effectiveness, of the implementation of the ISM Code. The ship will be eligible for re-inspections after 3 months from the final date of the report.  |
| 15.03.2024 | 1 | STCW CODE PART A                  | Incomplete passage plan: no manuel plotting position available as per passage plan instruction (every 6 minutes). Master instructed to keep proper records from now on.   |
|            | 2 | SOLAS CH.II-1                     | Auxiliary engine number two found with oil leakages.  |
|            | 3 | MLC TITLE 3                       | Provisions not propely stowed and segregated.   |
|            | 4 | SOLAS CH. II-1                    | Steering gear found with oil leakages.  |
|            | 5 | ICLL ANNEX A                      | Main deck corroded in several places. Master instructed to rectify deficiency within one month.   |
| 20.03.2024 | 1 | SOLAS CH. V                       | In the coastal waters there is no evidence that the ship's position was checked by an independent means of position fixing at required period, Master instructed to check the ship's position as per requirements from now on   |
|            | 2 | SOLAS CH. V                       | Last Passage plan from Istanbul Turkey to Constanta Romania Pilot to Pilot only and UKC information missing   |
|            | 3 | SOLAS CH.II-1                     | SWL information from towing arrangements on FWD Station not readable  |
| 08.05.2024 | 1 | SOLAS CH. XI / REG. 5             | CSR number 1,2,3,5, form 2 and 3 not filled up.   |
|            | 2 | MLC/TITLE 4/STD A4.3              | One forward mooring rope was found damaged.   |

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| 08.05.2024 | 3  | MLC 2006/STD. A2.3        | Records of seafarers' daily hours of work/rest for master, chief officer, for days, 4, 11, 18, 25 of April not corresponding with ship activity.  |
|            | 4  | STCW CODE PART A/PART 2   | Incomplete passage plan: passage plan not berth to berth (vessel berthed at Constanta N and passage plan was done for Constanta S), emergency anchorage area, abort point, parallel index, no go area not available.  |
|            | 5  | SOLAS 2022 /REG.17        | GMDSS Radio log improper fill up. A summary of communication relating to distress, urgency and safety traffic not recording. Master instructed to keep proper records from now on.  |
| 16.07.2024 | 1  | MLC TITLE 4               | One aft mooring rope was found damaged.   |
|            | 2  | ICLL ANNEX I REG.25       | The handrails at the freefall embarkation station were found heavily corroded (holed in two places)   |
|            | 3  | SOLAS CH.V REG. 14        | Information required by the deck logbook format is not properly recorded. The trip cannot be restored following the logbook entries.  |
|            | 4  | SOLAS CH.V REG.14         | The ship's working language is not established and recorded in the ship's logbook,  |
|            | 5  | SOLAS CH.IV REG.17        | The records of the distress and safety messages are missing or incomplete. Only the tests are recorded.   |
|            | 6  | MLC TITLE 3               | The air conditioner system was found to be inefficient. The accommodation area was found to be overheated.  |
|            | 7  | SOLAS CH. V REG. 34       | The last passage plan was found to lack information. (The anchorage position is not included, the method of fixing position, reporting points, and no-go areas are missing)   |
|            | 8  | STCW CODE PART A          | In the coastal waters, there is no evidence that the ship's position was checked as per requirements (during the arrival maneuvering).  |
|            | 9  | SOLAS CH. V REG.18        | VDR annual test certificate missing. Rectified during inspection.   |
|            | 10 | SOLAS CH.III REG.19       | The fire drill was of very poor quality, indicating a lack of knowledge and training demonstrated by the ship's officers. Most of the essential elements were missing during the drill. (fire area - not properly insulated, boundary cooling - not performed, personal protective equipment not properly used inside of the fire area - breathing apparatus, gloves, helmet, and there was very poor communication and organization) |
|            | 11 | MLC TITLE 3 REG.3.1       | An inappropriate flushing water system was found in the main deck common toilet. (the basins for the flushing water are missing). The sink in the toilet is cracked.  |
|            | 12 | ICLL ANNEX I REG.16       | The compression bars and the wheel ramp were found corroded. The foam was used to seal the hatch covers. The deck cranes used for opening the hatch covers were found to be in poor condition (they show signs of corrosion). The testing evidence is missing.  |
|            | 13 | STCW ANNEX REG VIII       | An outdated table of shipboard working arrangements was found on the vessel.  |
|            | 14 | STCW CODEANNEX REG. III/3 | The third engineer (watchkeeping officer 00-04 & 12-16) was discovered to have an inappropriate Certificate of Competency.  |
|            | 15 | SOLAS CH.II-2 REG.15.2    | The posted fire plans were found not updated. (the fire doors are readable on the plans)  |
|            | 16 | MLC TITLE 4 REG. 4.3      | The chemicals are stored in the steering gear room. The steering gear room does not have a firefighting system, and the access door is wooden type and has holes.   |
|            | 17 | SOLAS CH. V REG 12        | Excessive error at the magnetic compass was observed (about 20 deg.)  |

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|              |                   | <b>18</b> | SOLAS CH.II-2<br>REG.16.2            | The specific information about the ship was found incomplete. (e.g. fire protection in the paint locker missing)   |
|              |                   | <b>19</b> | SOLAS CH. II-2 REG 31                | The door to the room where the refrigerators are stored is missing. The frames of the main deck toilet doors were found damaged due to corrosion.  |
|              |                   | <b>20</b> | SOLAS AMEND IX<br>REG.3              | A safety management audit by the Administration is required before the ship's departure. Deficiencies marked ISM are objective evidence of a serious failure, or lack of effectiveness, of implementation of the ISM Code. |
|              |                   |           |                                      |  |
| <b>MIDIA</b> | <b>30.10.2022</b> | <b>1</b>  | STCW CODE PART A /<br>PART 4-1       | In the coastal waters there is no evidence that the ship's position was checked by an independent means of position fixing at required period.   |
|              |                   | <b>2</b>  | MLC /STD. A2.1                       | The amount of paid annual leave or the formula used for calculating it is not recorded in the SEAs.  |
|              |                   | <b>3</b>  | MLC 2006 /STD. A3.1                  | Upper deck common toilet is malfunction - water drain system is damaged. Deck A common toilet was found with one toilet seat cracked.  |
|              |                   | <b>4</b>  | STCW CODE PART<br>A/PART 4-3         | The records of received urgency and safety messages missing or are incomplete. Master instructed to keep proper records from now on.   |
|              | <b>22.11.2022</b> | <b>1</b>  | MLC 2006 /STD. A4.3                  | One aft mooring rope was found damaged.  |
|              |                   | <b>2</b>  | MLC 2006 /STD. A4.3                  | The ship's access was found not safely. The ship's access ladders exceeds the maximum accepted angle.  |
|              |                   | <b>3</b>  | MLC/STD. A4.3                        | Small amount of oily-water mixtures was found in the Engine Room.  |
|              | <b>27.02.2023</b> | <b>1</b>  | ICLL /AN. A /ARTIC. 15               | Main deck, flooring plates from deck walkway, aft mooring deck rusted in several areas.  |
|              |                   | <b>2</b>  | STCW/PART 4-1                        | Compass error correction not recorded at least once per watch. Master instructed to. keep proper fill up from now on.  |
|              |                   | <b>3</b>  | SOLAS /CH. IV/R. 17                  | GMDSS Radio log improper fill up. A summary of communication relating to distress, urgency and safety traffic not recording. Master instructed to keep proper records from now on.   |
|              |                   | <b>4</b>  | SOLAS CH. II-1/R. 29                 | Steering gear found with oil leakage.  |
|              |                   | <b>5</b>  | SOLAS /CH. III /R. 19                | Lack of rescue procedure. Lack of communication between team leader and fire squad.  |
|              |                   | <b>6</b>  | MARPOL /R. 10                        | Insufficient storage capacity available on board for the category (A)-plastic.   |
|              |                   | <b>7</b>  | ICLL AN. A /ARTICLE 15               | Hull corroded. Master instructed to rectify in 90 days.  |
|              |                   | <b>8</b>  | SOLAS /IX/R.3/ ISM<br>CODE/PART A /1 | Deficiencies marked ISM are objective evidence of failure, or lack of effectiveness, of the implementation of the ISM Code. The ship will be eligible for re-inspection after 3 months from the final date of the report.  |