



Luxembourg, 6th April 2023

Circular CAM 05/2023

O/Ref.: JS/116048

Subject: Watertight and weathertight integrity for ships visiting Australian ports

To: All Accredited Shipping Managers, ship owners, ship operators, Designated Persons Ashore, Masters of Luxembourg flagged ships and Recognised Organisations and Flag State Inspectors.

The present Circular brings to your attention that the Australian Maritime Safety Authority (AMSA) is carrying out ongoing watertight and weathertight integrity inspections during routine port State control (PSC) throughout 2022-23, as stated on the website <https://www.amsa.gov.au/>:

*****QUOTE*****

This campaign aims to support foreign-flagged and regulated Australian ships with information to help you avoid water ingress and the associated safety and financial risks. Watertight and weathertight deficiencies identified during a port State control inspection often reflect a failure of the planned maintenance program to address watertight and weathertight integrity issues in areas such as watertight doors, cargo hatches and hatchways, ballast tanks and cargo hold venting, overboard sea water valves.

Routine checks

Watertight and weathertight components are exposed to wear and tear over time. Routine checks will help to pick up maintenance issues before they become a problem.

Operators and masters should ensure their crew can conduct routine checks and repairs safely, by providing:

- adequate instructions, particularly those supplied by the manufacturer; and
- sufficient resources and time.

Crew should be familiarised with:

- water and weathertight components and their operations; and
- associated safety precautions.

For example, those involved with hatch cover operation and maintenance should be provided with hatch cover-specific training. This will help to ensure crew are sufficiently familiarised to carry out proper repairs and maintenance.

Before leaving port, crew should inspect doors, vents, hatch covers, gaskets, securing devices, and other openings that allows the ingress of water.

The crew should:

- inspect items according to manufacturers' instructions; and
- focus on the condition, levels of corrosion, cracks, and missing parts / failures in components.

Planned maintenance

Maintenance of the ship and equipment is a requirement of the International Safety Management (ISM) Code (Clause 10.1).

Ship inspection data shows that watertight and weathertight integrity remains a persistent and concerning issue for ships in Australian ports, making up 9% of detainable deficiencies in 2021. Regular maintenance reduces the risk of equipment failure and ensures that the components and equipment continue to perform their intended function. It is also much cheaper than stopping a ship for replacement or repair.

To ensure an effective maintenance program, ship operators should assess associated risks and consider the following:

- the maintenance recommendations and specifications of the equipment manufacturer;
- the history of the equipment, including failures, defects and damage, and the corresponding remedial action(s);
- the results of third-party inspections;
- the age of the ship;
- identified critical equipment or systems; and
- the consequences of the failure of the equipment on the safe operation of the ship.

Ship operators should ensure that:

- maintenance instructions of watertight and weathertight components are included in the ship's maintenance program, including records of maintenance, tests and repairs;
- watertight and weathertight components are not corroded;
- gaskets are periodically replaced;
- movable parts are kept properly lubricated; and
- fittings are periodically overhauled.

AMSA expects that the ship operators will have consulted with the equipment manufacturers, classification society, and flag State in preparing appropriate measures to ensure the continued safe operation of equipment and ship.

*****UNQUOTE*****

The Commissariat aux affaires maritimes reserves the right to intensify the number and frequency of flag state inspections in order to ensure full compliance in this matter.

You are kindly requested to ensure adequate dissemination of this information within your company and to the relevant Luxembourg flagged vessels.



(s) André Hansen
Government Commissioner
for maritime affairs