

Onboard Repairs - Compliance with Class and Statutory Requirements - A P&I Perspective

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Recently an entered vessel carried out repairs to a part of the vessel's structure that fell within the ambit of Class. However, Class had not been notified of the original damage nor of the planned repairs. The repairs were carried out without Class in attendance. Moreover, the quality of repair was substandard and was causative of subsequent damage to the vessel's cargo. The cargo claim was substantial. There was also a question whether the P&I cover had been prejudiced on the basis of a breach of Classification Society rules.

This case represents a timely reminder to Members of the potential need to involve Class in repairs and that in accordance with the Club's Rules 20A, 20F and 38-2(vii), compliance with Classification Society rules and statutory requirements are both conditions of P&I cover.

Classification Societies develop their rules with the objective of ensuring that a vessel's structural strength and integrity, along with the reliability of function of shipboard equipment and systems, are effectively maintained during its operational life. Continuing conformity with Class rules is verified by means of regular surveys, when Classification surveyors visit vessels to perform onboard inspections. It is not realistic to expect that the entire vessel and all its machinery, without exception, will be closely examined during these inspections; the regular survey is rather a sampling process based on the surveyor's practical experience, Classification and statutory guidelines, and the actual age and condition of a particular vessel. Non-periodical - also called occasional - surveys are required in all other Class-related cases.

It is the responsibility of the shipowner to maintain and repair the vessel in periods between regular surveys. Moreover, the shipowner is required to inform the corresponding Classification Society as soon as any damage or defect which may affect conformance with Classification rules is discovered. There is no precise definition of what deficiencies are relevant in this respect. In general, these would be defects which diminish the structural capability of the hull, breach the watertight integrity of tanks or the hull, or impair redundancy or normal operation of a vessel's propulsion, steering, power generation, auxiliary machinery and associated systems. In case of doubt as to whether a particular deficiency warrants Class attention, shipowners should contact their Classification Society for clarification.

A vessel's Class can be suspended if its owner fails to request a survey of the above damages or executes repairs of such defects without requesting the attendance of a Class surveyor. [IACS Unified Requirement Z13 "Voyage Repairs and Maintenance"](#) provides guidelines on the circumstances in which repairs to hull, machinery or equipment which affect or may affect Classification may be carried out during a voyage by a riding squad. The same principles apply for repairs performed by the vessel's crew.

As far as routine maintenance is concerned, IACS UR Z13 sets out:

(...) maintenance and overhaul to hull, machinery and equipment in accordance with manufacturer's recommended procedures and established marine practice (...) does not require the Classification Society's approval; however, any repair as a result of such maintenance and overhauls which affects or may affect classification is to be noted in the ship's log and submitted to the attending Surveyor for use in determining further survey requirements.

Similarly, compliance with the statutory requirements of the IMO addressing the safety, security and environmental performance of international shipping is enforced by Flag states, who issue the relevant certification. Flag states may authorise Classification Societies or individual surveyors to act on their behalf. Therefore defects which impede fire-fighting response, weaken life-saving preparedness, jeopardise the safety

of navigation or may cause pollution are required to be reported either to the relevant Flag state administration, to the Classification Society or to the port authority in accordance with SOLAS Ch.I, reg.11(c), who will then decide on further actions.

For additional information, please seek advice from your Classification Society or visit the [website of the International Association of Classification Societies](#), alternatively, Members requiring further guidance should contact the [Loss Prevention department](#).

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