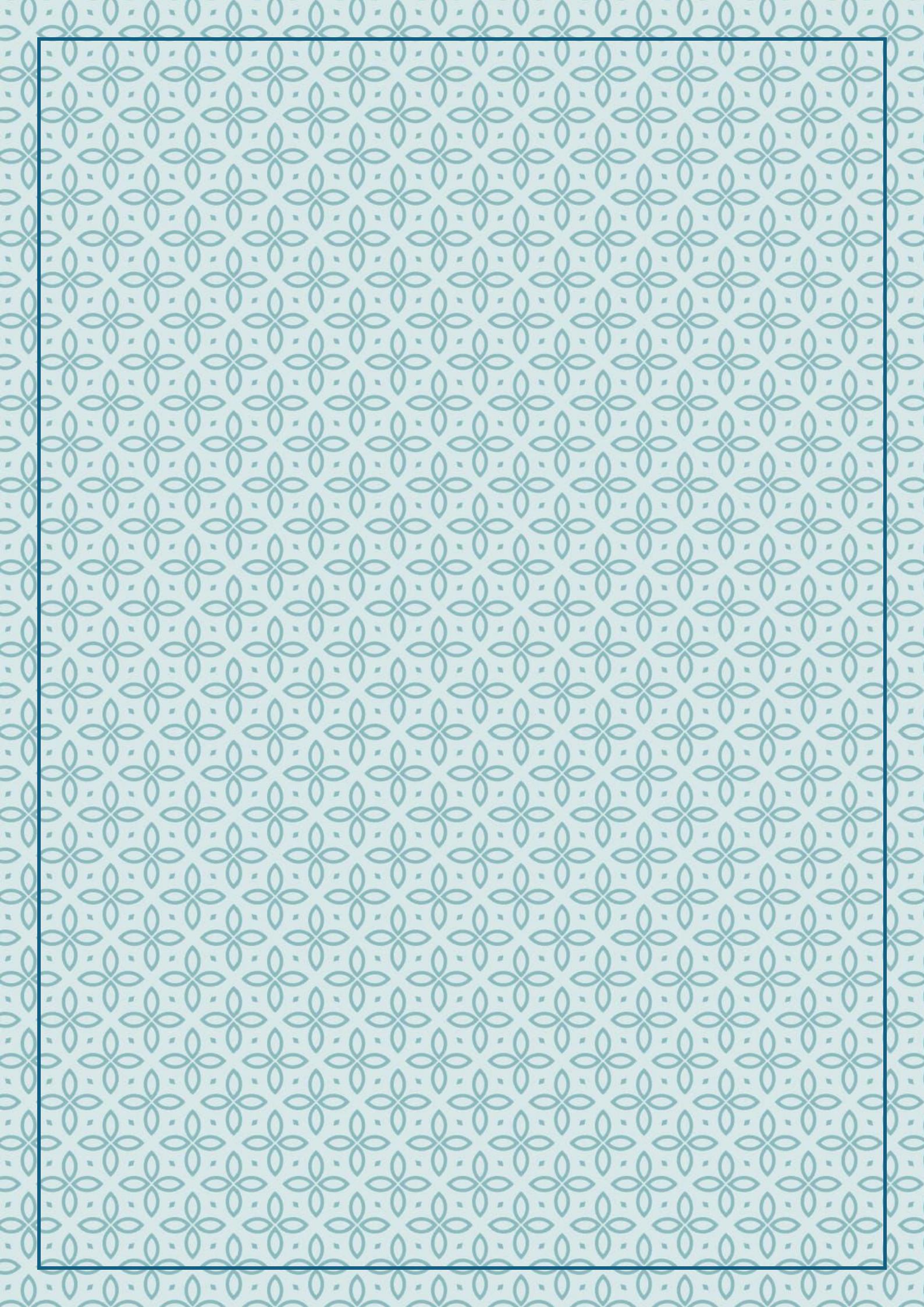


# COMPREHENSIVE SAFETY MANAGEMENT Report

2025





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## Message from the Director General of Shipping

As the Director General of Shipping, Government of India, it is with great pride and responsibility that I present the second “Comprehensive Safety Management Report” of the Indian mercantile marine administration. This annual publication reflects our continued commitment to strengthening maritime safety, seafarer welfare, and regulatory compliance across the Indian shipping sector.



Since the release of the first report, the Indian Maritime Administration has further intensified its efforts to improve safety performance through targeted inspections, rigorous audits, and continuous monitoring of compliance. The Age and Quality norms for vessels entering and operating under the Indian flag, coupled with strengthened oversight of Recognized Organizations, ship owners, managers, charterers, and port authorities, have together contributed to raising the safety index of Indian shipping.

Maritime safety remains a multifaceted challenge that demands the coordinated engagement of all stakeholders — the Administration, Recognized Organizations, ship operators, ports, and coastal state agencies. While inspections and audits may appear to some as a rigorous burden, it is important to recognize their value as a system of performance indicators that help us identify weaknesses, address deficiencies, and safeguard lives, assets, and the marine environment.

This second report not only examines survey outcomes, inspections, audits, and casualty records but also evaluates the performance of companies and organizations entrusted with the responsibility of ensuring safe operations. It continues our efforts to streamline inspection and audit regimes while providing stakeholders with meaningful insights to support their internal improvement processes.

I am also pleased to note that this report complements other performance-based publications of the Indian Administration, such as the Marine Environment Management Report and the Port State & Flag State Inspection Reports. Together, these documents reinforce India's role as a responsible maritime nation committed to transparency, accountability, and continuous improvement.

Finally, I extend my sincere appreciation to the officers and staff of the Directorate General of Shipping for their dedicated efforts in compiling this report. Their work reflects our shared commitment to making Indian shipping safer, greener, and globally competitive. I am confident that all stakeholders will find this edition to be an important tool in advancing maritime safety and compliance.

Shri. Shyam Jagannathan, IAS  
Director General of Shipping &  
Additional Secretary to the Government of India



## Message from the Chief Surveyor

As the Chief Surveyor with the Government of India, it is with great satisfaction that I present the second edition of the Comprehensive Safety Management Report. This year's publication represents an important step forward in consolidating safety performance indicators, strengthening our oversight mechanisms, and ensuring that Indian shipping continues to meet the highest international standards of safety and compliance.



The report provides a meticulous analysis of ship safety covering multiple aspects — the effectiveness of safety management systems under the ISM Code, living and working conditions of seafarers under MLC inspections, and the outcomes of statutory surveys, audits, and inspections. Particular attention has been given this year to recurring deficiencies, company-wise performance trends, and port-wise distribution of inspections, enabling stakeholders to identify patterns and adopt corrective actions.

This edition also evaluates the implementation of policies issued by the Directorate, including periodicity and targeting of Flag State Inspections (FSI) and Port State Control (PSC) inspections, ensuring that oversight remains balanced and risk-based across India's 12 major and over 200 minor ports.

The diversity of the Indian fleet — ranging from tugs and offshore support vessels to bulk carriers, tankers, and specialized ships such as gas carriers, chemical tankers, and dredgers — requires careful monitoring. This report endeavours to provide a structured analysis by ship type, age profile, and company performance, offering stakeholders meaningful insights for improving operational safety.

I am also pleased to highlight that the Directorate is expanding the use of digital tools for audit and inspection management, data-driven targeting, and enhanced reporting mechanisms. These advancements will allow us to further improve transparency, efficiency, and quality of oversight in the years ahead.

I extend my deepest appreciation to all surveyors, officers, and staff of the Directorate, as well as the Recognized Organizations and shipping companies, for their dedicated efforts in data collection, inspections, and audits. Their

contributions have been invaluable in compiling this report and advancing our collective mission to strengthen maritime safety.

I am confident that this second edition of the Comprehensive Safety Management Report will serve as a valuable tool for stakeholders to assess performance, implement corrective measures, and reinforce a culture of safety and compliance across Indian shipping.

Shri. Ajithkumar Sukumaran  
Chief Surveyor-cum-Addl. DG of Shipping (Engineering)  
Directorate General of Shipping  
Government of India



## Message from the Nautical Advisor

As the Nautical Advisor to the Government of India, it is my privilege to present the second edition of the Comprehensive Safety Management Report, 2025. This publication continues our effort to provide stakeholders with a consolidated view of the safety performance of Indian ships and the companies managing them. The year 2024 witnessed both progress and challenges. Indian flag tonnage showed a steady increase, with growth in bulk carriers, offshore support vessels, and specialized ships, reflecting the dynamism of our maritime sector. At the same time, the age profile of the fleet highlights the importance of balancing modernization with the continued operation of older vessels.



Safety management remains central to India's maritime vision. The analysis of ISM audits during 2024 revealed recurring findings under Clause 10 (Maintenance of Ship and Equipment), Clause 11 (Documentation), and Clause 12 (Company Verification and Review). These areas, while consistent with previous years, call for renewed emphasis on maintenance practices and systematic verification of safety management systems.

The findings from Port State Control (PSC) and Flag State Inspections (FSI) also underline the importance of compliance readiness. While many Indian ships continue to perform above average in inspections, targeted efforts are required in sectors such as other cargo ships and offshore support vessels, where deficiencies were more frequent.

Equally significant are the outcomes of Maritime Labour Convention (MLC) inspections, which continue to highlight issues related to seafarer employment agreements, wages, and accommodation facilities. These findings are not just regulatory markers but also indicators of the quality of life and well-being of our seafarers, which must remain a top priority.

Looking ahead, India's maritime administration is committed to strengthening digital tools for inspections and audits, enhancing transparency, and adopting risk-based approaches for PSC targeting. The insights from this report will guide corrective and preventive actions by shipowners, managers, and surveyors, ensuring that India maintains its reputation as a responsible maritime nation.

I extend my appreciation to all surveyors, Recognized Organizations, and industry stakeholders for their contribution to compiling this year's report. I am confident that this edition will serve as a valuable resource for improving safety culture and compliance across the Indian shipping industry.

Capt. Abul Kalam Azad  
Nautical Advisor-cum-Addl. DG of Shipping (Nautical)  
Directorate General of Shipping  
Government of India



## Message from the Chief Ship Surveyor

It is with pride and satisfaction that this Directorate presents the Annual Maritime Performance and Safety Review. This publication stands as a testament to the dedication, professionalism and collective pursuit of excellence that characterise India's maritime administration and industry. It reflects our unwavering commitment to safety, regulatory compliance and sustainable growth in an evolving global maritime landscape.



Over the past year, the Indian shipping sector has demonstrated resilience and adaptability amid changing international mandates and technological advancements. The analyses in this report — covering Safety Management Audits, MLC Inspections, Classification and Flag State performance, and oversight of Recognized Organizations — provide a comprehensive assessment of our fleet's operational integrity and governance standards.

Indian-flagged vessels continue to uphold high standards of safety and performance, earning recognition under the Paris and Tokyo MoUs. This achievement reflects the collective efforts of shipowners, classification societies, seafarers and the Directorate General of Shipping, whose shared commitment reinforces the global credibility of the Indian Flag.

This Review not only documents achievements but also guides continuous improvement. The data and insights presented serve as valuable inputs for policy formulation, risk management and strategic planning, supporting the progressive advancement of our maritime sector.

I extend sincere appreciation to all officers, surveyors and stakeholders whose diligence and expertise ensured the quality and accuracy of this publication.

Shri. Pradeep Sudhakar K  
Chief Ship Surveyor-cum-Joint Director General  
Directorate General of Shipping  
Government of India

## From the Editor's Desk

This Comprehensive Safety Management Report 2025 marks the second consolidated effort to present the safety performance indicators of Indian ships and the management companies responsible for their operation. The report seeks to provide an integrated assessment of ship safety and compliance, drawing upon survey records, inspection outcomes, audit findings, and casualty data.



The analysis covers multiple dimensions which directly or indirectly reflect the overall safety culture in Indian shipping:

**Survey planning and maintenance between statutory surveys** – The issuance of conditions of class during annual, intermediate, or renewal surveys provides insights into ship maintenance standards, operational readiness, and compliance with Regulation 11, Part B, Chapter I of SOLAS. Such data also indicates the extent to which defects affecting safety and life-saving equipment are reported promptly to the Administration or Recognized Organizations.

**Port State Control (PSC) and Flag State Inspections (FSI)** – The report analyses the outcomes of PSC and FSI inspections and relevant circulars issued by the Directorate, enabling stakeholders to understand inspection trends, compliance patterns, and areas of recurring concern.

**ISM DOC and SMC Audits** – Detailed audit analysis highlights:

- The nature and frequency of non-conformities across companies and ship types.
- Average non-conformities per DOC and SMC audit.
- Performance of management companies by ship type.
- Non-conformities observed during interim audits and the conversion ratio of interim DOCs to initial audits.

**MLC Inspections** – A separate section provides an in-depth review of Maritime Labour Convention compliance, including:

- The nature and distribution of MLC deficiencies across ship types.
- Assessment of working and living conditions of seafarers.
- Company-level performance in addressing MLC requirements.

**Performance of Recognized Organizations** – Based on annual audits and inspection statistics, the report attempts to assess the consistency and effectiveness of Recognized Organizations in ensuring compliance and maintaining safety standards on Indian ships.

The global maritime community increasingly views flag administrations through the lens of port state performance. This report continues the effort of the Annual Port State and Flag State Performance Report, extending it to correlate other safety indicators such as casualty records, conditions of class, ISM audits, and MLC inspections with PSC outcomes.

The presentation of safety data is designed to enable stakeholders to carry out self-assessment, identify corrective and preventive actions, and collectively raise the safety index of Indian ships, ports, and seafarers. With India's vast coastline serviced by over 12 major and 200 minor ports, targeted and balanced inspection coverage is essential to ensure that no port becomes a safe haven for sub-standard ships while also avoiding undue concentration of inspections at specific ports.

The Directorate of Shipping invites feedback from stakeholders to strengthen future editions of this report and ensure that it continues to serve as a meaningful tool for improving safety, compliance, and seafarer welfare in Indian shipping.

Shri. Satish Kamath

Dy. Chief Surveyor-cum-Sr. DDG (Tech.)

Directorate General of Shipping

Government of India

सागरः सुपन्थानः सन्तु

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# Chapter I: Overview of Indian Flag Tonnage and Recent Trends

## Introduction to Indian Flag Tonnage

Indian flag tonnage encompasses a diverse fleet including cargo ships, tankers, passenger vessels, and other specialized ships operating in coastal and international waters. The growth and stability of Indian flag tonnage are crucial indicators of the nation's maritime strength, economic activity, and self-reliance in sea trade.

The Indian shipping industry plays a vital role in facilitating both domestic and international trade, contributing significantly to the nation's economy. The size and composition of the Indian fleet reflect the country's maritime policies, global trade dynamics, and investment in the shipping sector.

## Analysis of Indian Flag Tonnage:

The Indian flag tonnage has shown a modest increase from the end of 2023 to the end of 2024, indicating a continued growth trajectory for the national fleet.

### Key Figures:

- **As on December 31, 2023:** The total Indian flag tonnage stood at **13.75 million GT**.
- **As on December 31, 2024:** The total Indian flag tonnage increased to **13.81 million GT**.

**Trend and Analysis:** Between the end of 2023 and the end of 2024, the Indian flag tonnage experienced a growth of **67,000 GT**. This increment, while not substantial, signifies a positive trend in the expansion of India's maritime capabilities. The slight increase suggests ongoing efforts to modernize and enlarge the fleet, potentially through new acquisitions, capacity upgrades, or improved registration processes.

This growth contributes to enhancing India's capacity for seaborne trade, reducing reliance on foreign shipping, and strengthening its position in the global maritime landscape. Factors contributing to this trend could include government initiatives promoting domestic shipping, increased demand for maritime transport services, and strategic investments by Indian shipping companies.

### Key Observations of Coastal/Foreign going Indian tonnage (1997-2024):

- **Coastal Tonnage Growth:** The coastal tonnage has exhibited a significant upward trend over the analysed period. Starting from 1.40 million GT in 1997, it reached 1.67 million GT by the end of 2024. There is very small growth in coastal shipping tonnage in these years up to 2024. But this sustained growth highlights the increasing reliance on coastal shipping for domestic trade and

transportation of goods along India's vast coastline. While there have been minor year-on-year fluctuations, the overall trajectory is robustly positive, demonstrating the sector's expansion and modernization efforts in the years to come.

- **Foreign-Going Tonnage Growth:** The foreign-going (overseas) tonnage also experienced substantial growth, increasing from 6.74 million GT in 1997 to 12.14 million GT in 2024. This segment consistently represents the larger share of India's total tonnage, underscoring its pivotal role in international trade. Notable growth spurts were observed, particularly between 2008 and 2011, and a resumed upward trend from 2016 onwards after a brief plateau. This expansion reflects India's growing engagement in global commerce and its efforts to enhance its presence in international shipping lanes.



*Table 1. Table of Indian Coastal and Foreign-going tonnage year-wise from 1997-2024  
(expressed in Thousand GT)*

Year	Coastal GT	Overseas GT	Total GT
1997	140	6744	6884
1998	172	6876	7048
1999	233	6945	7178
2000	359	7067	7426
2001	397	7124	7521
2002	436	7202	7638
2003	467	7245	7712
2004	532	7306	7838
2005	598	7371	7969
2006	677	7454	8131
2007	740	7653	8393
2008	804	8080	8884
2009	980	8499	9479
2010	1013	9152	10165
2011	1048	10013	11061
2012	1086	9331	10417
2013	1135	9248	10383
2014	1218	9090	10308
2015	1502	9006	10508
2016	1518	9907	11425
2017	1469	10883	12352
2018	1479	11204	12683
2019	1480	11266	12746
2020	1672	11433	13105
2021	1560	11538	13098
2022	1578	11696	13274
2023	1722	12023	13745
2024	1672	12140	13812

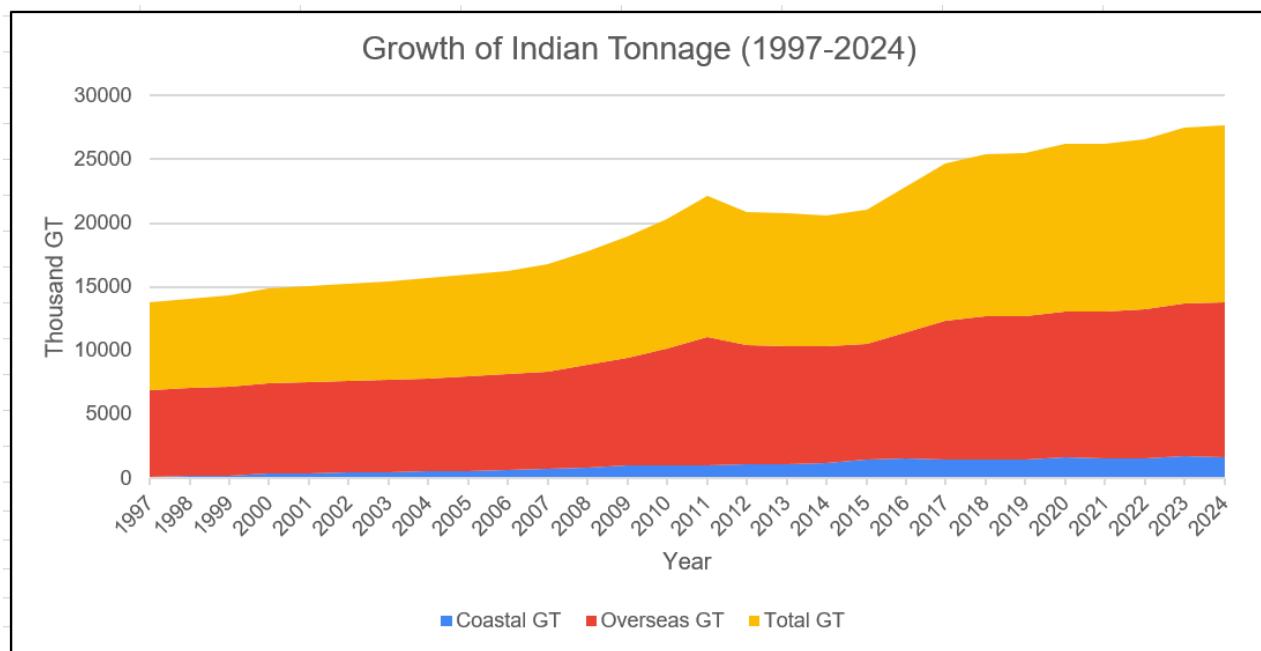


Figure 1. Growth of Indian Tonnage (expressed in Thousand GT) (1997-2024)

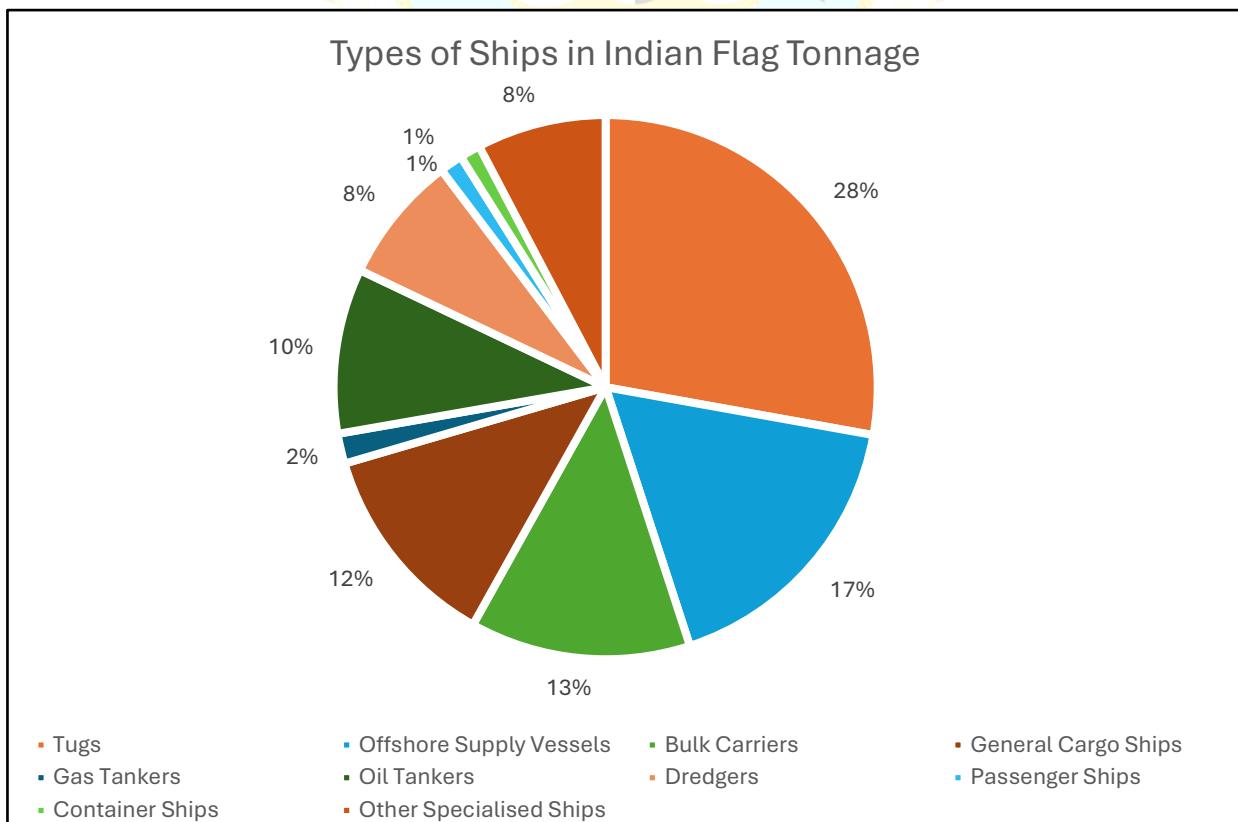


Figure 2. Analysis of Types of Ships under Indian Shipping Fleet in 2024

## Analysis of Types of Ships in Indian Shipping Fleet in 2024:

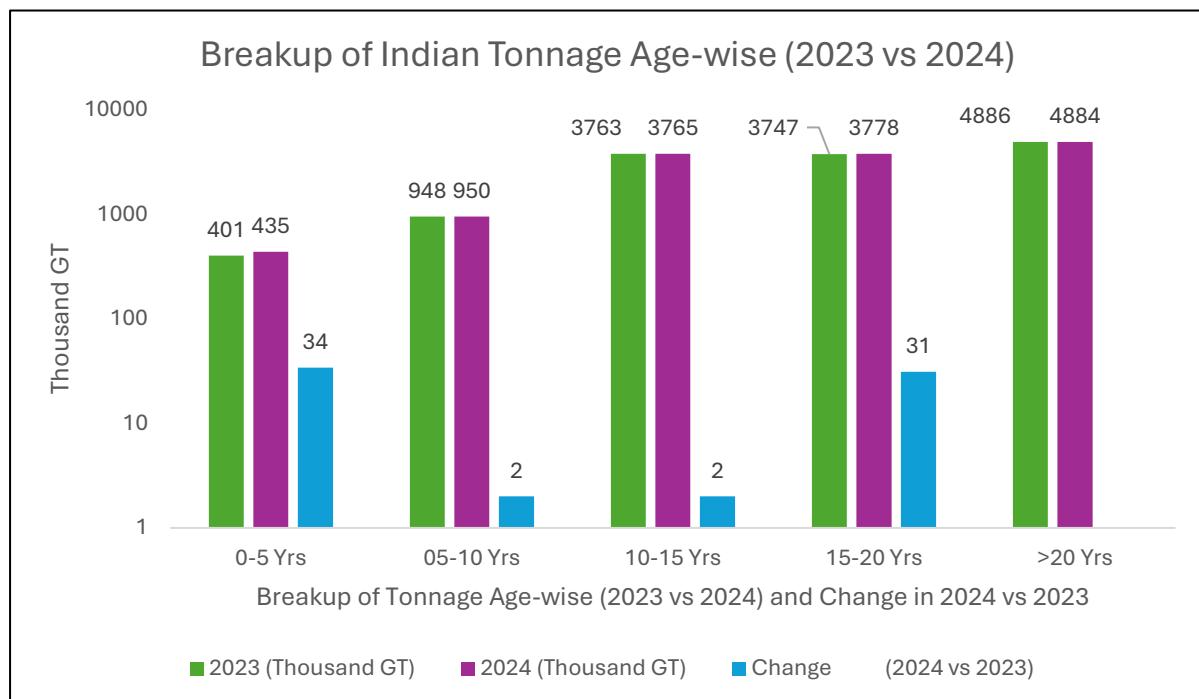


Figure 3. Age-wise Break-up of Indian Fleet & Change for 2023 & 2024

The Indian tonnage comprises a diverse fleet of ships, reflecting the varied requirements of its coastal and international trade, as well as specialized maritime activities. As of December 2024, the total number of ships in the Indian fleet was 1701. Key vessel types and their approximate numbers include Tugs (405), Offshore Supply Vessels (250), Bulk Carriers (191), General Cargo ships (180), and Oil Tankers (143). Other notable categories include Specialized Vessels (112), Dredgers (111), Passenger Ships (20), Container Ships (18). Analysing the growth from December 2023 to December 2024, most vessel types saw an increase in numbers; for instance, Bulk Carriers grew by 11 vessels (from 180 to 191), Offshore Supply Vessels by 10 (from 240 to 250), and Tugs by 15 (from 390 to 405). Specialized Vessels and Dredgers also saw increases, indicating expansion in niche maritime services. Conversely, General Cargo vessels experienced a decrease of 10 ships (from 190 to 180), while the numbers for Container Ships, Passenger Ships remained stable. This growth pattern highlights the Indian maritime sector's dynamic nature, with expansion in specific segments to meet evolving demands in areas like bulk transport, offshore support, and port infrastructure.

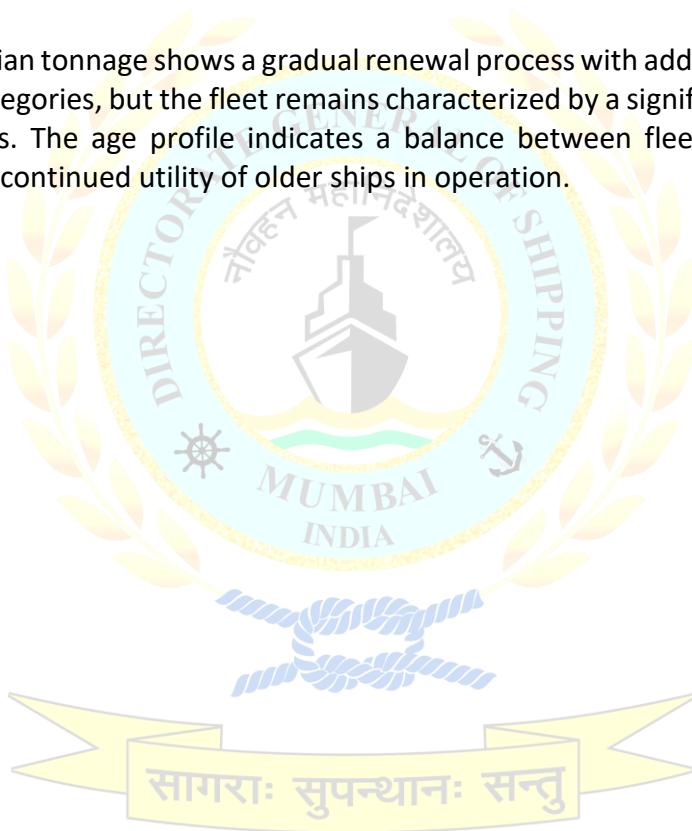
### Breakup of Indian Tonnage Age-wise (2023 Vs 2024):

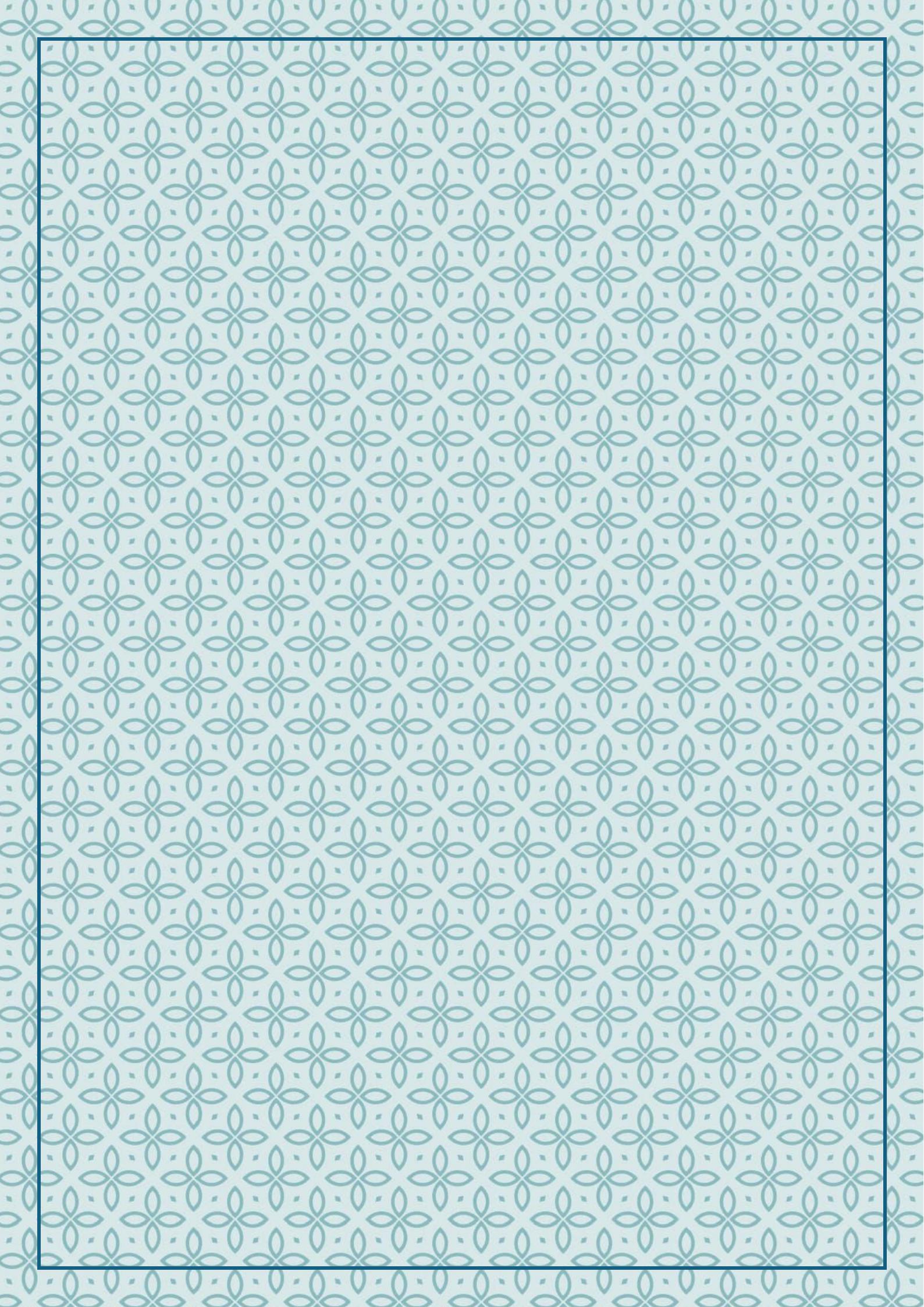
- Newer Fleet (0-10 years):** This segment, comprising vessels aged 0-5 years and 5-10 years, shows a positive, albeit modest, growth from 1,349 thousand GT in 2023 to 1,385 thousand GT in 2024. This indicates continuous, strategic

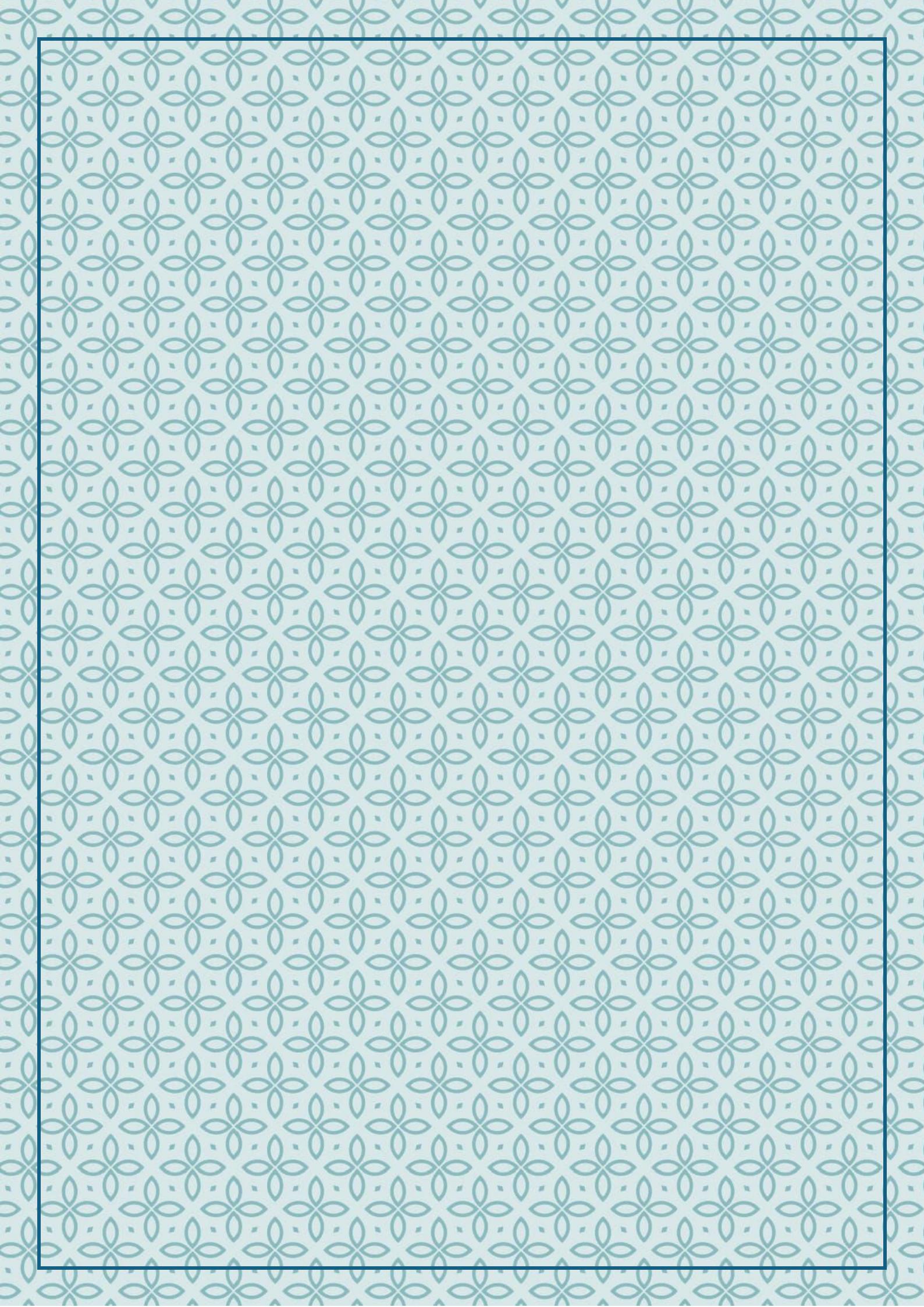
additions of new vessels to the Indian fleet, which is crucial for modernization and enhancing efficiency.

- **Mid-Life Fleet (10-20 years):** Vessels in the 10-15 years and 15-20 years age brackets collectively represent a significant portion of the Indian tonnage, growing from 7,510 thousand GT in 2023 to 7,543 thousand GT in 2024. This substantial presence of mature vessels highlights their continued operational life and contribution to the overall fleet capacity.
- **Older Fleet (>20 years):** The largest segment of the Indian fleet, in terms of Gross Tonnage, consists of vessels more than 20 years old. While this category saw a marginal decrease from 4,886 thousand GT in 2023 to 4,884 thousand GT in 2024, it still accounts for a considerable share of the total tonnage. The prevalence of older vessels suggests that while new ships are being inducted, there's also a sustained reliance on the existing, aging fleet.

Overall, the Indian tonnage shows a gradual renewal process with additions in younger and mid-life categories, but the fleet remains characterized by a significant proportion of older vessels. The age profile indicates a balance between fleet modernization efforts and the continued utility of older ships in operation.







# Chapter II: The Safety Management Audit Report: 2021-2024

## Background

1. Relevant Rules/MS Notices/DGS Circulars
  - i. Merchant Shipping (Management for the Safe Operation of Ships) Amendment Rules, 2014.
  - ii. Merchant Shipping (Management for the Safe Operation of Ships) Amendment Rules, 2003.
  - iii. Merchant Shipping (Management for the Safe Operation of Ships) Amendment Rules, 2002.
  - iv. Merchant Shipping (Management for the Safe Operation of Ships) Rules, 2000.
  - v. Merchant Shipping Notice No.09 of 2014
2. Delegation of Safety Audits under ISM
  - i. The Document of Compliance of Audits, that is, interim, initial, annual and renewal are conducted by Administration.
  - ii. The Interim, Initial and Renewal Safety Management Audits have been delegated to IRS. Intermediate Audits are undertaken by Administration except for ship plying abroad where IRS undertakes the Audits.
3. Issuance of Safety Management Certificates: Interim SMC can be issued by IRS, while initial and renewal certificates are issued by Administration.

## Analysis of Data

1. About 100 DOC Audits are conducted every year and about 130 SMC Audits except the intermediate audits conducted by Administration Auditors.
2. More than 50 DOC Companies are holding other cargo ships DOC, while those holding Bulk Carrier and Chemical Tanker DOC are about 18 and 11 respectively.
3. More than 45% of all DOC Audits in last two years are Interim audits indicating growth of management companies in India.

*Table 2. Number of DOC Audits*

Year	Interim	Initial	Annual	Renewal	Additional	Total
2021	33	10	41	11	1	96
2022	28	16	37	20	4	105
2023	30	13	31	6	16	96
2024	35	17	44	11	10	117

*Table 3. Details of all DOC Audits*

Year	Total Number of Audits	Total Number of NCs	NCs/Audit	Number of Audits with Nil Findings	Nil Finding Index
2021	96	99	1.03	45	0.468
2022	105	112	1.07	49	0.467
2023	96	109	1.135	43	0.448
2024	117	177	1.51	39	0.333

Table 4. Year wise breakdown of DOC Audits for 2024, 2023 and 2022

DOC Audits 2024					
Audit Type	Total Number	Number with Nil Findings	Nil Finding Index	Total Number of Findings	NCs/Audit
Interim	35	29	0.828	11	0.314
Initial	17	1	0.058	39	2.29
Annual	44	2	0.045	94	2.13
Renewal	11	2	0.1818	20	1.818
Additional	10	5	0.5	13	1.3
DOC Audits 2023					
Audit Type	Total Number	Number with Nil Findings	Nil Finding Index	Total Number of Findings	NCs/Audit
Interim	30	26	0.867	4	0.133
Initial	13	3	0.23	18	1.385
Annual	31	3	0.096	62	2
Renewal	6	1	0.167	10	1.67
Additional	16	10	0.625	15	0.9375
DOC Audits 2022					
Audit Type	Total Number	Number with Nil Findings	Nil Finding Index	Total Number of Findings	NCs/Audit
Interim	28	27	0.964	1	0.0357
Initial	16	7	0.4375	19	1.1875
Annual	37	5	0.185	67	1.811
Renewal	20	7	0.35	24	1.2
Additional	4	3	0.75	1	0.25

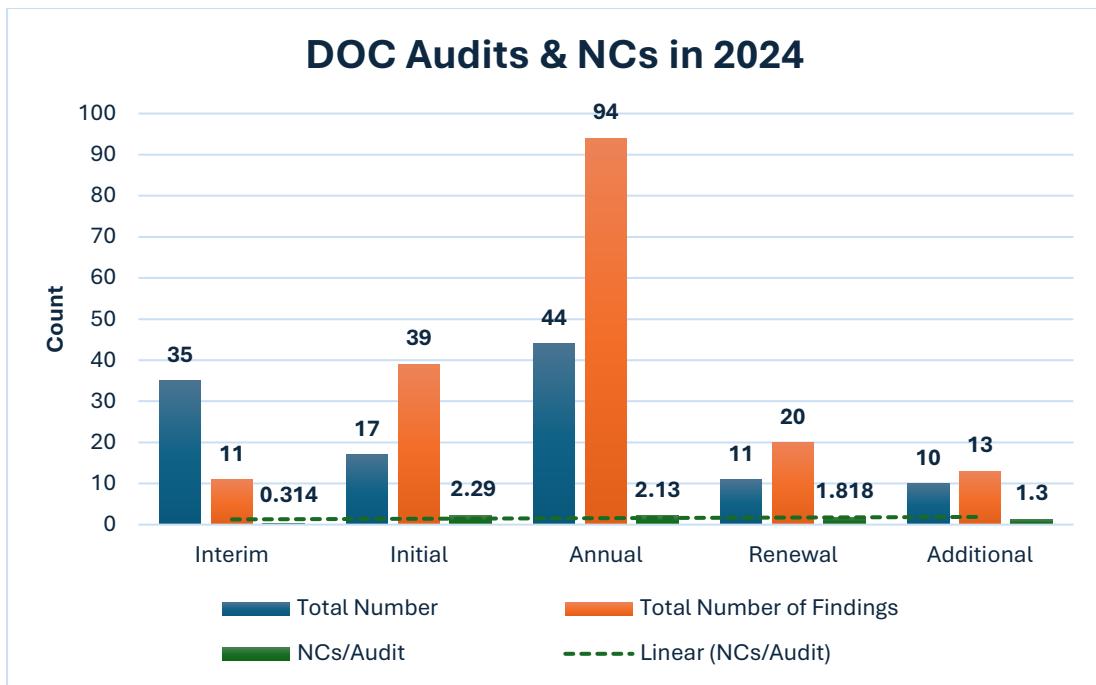


Figure 4. DOC Audits and NCs in 2024

### Nil Findings DOC Audits:

- About **35%** of all DOC audits in 2024 reported nil findings, while in SMC Audits this figure is around **5–6%**.
- For SMC **Initial/Intermediate/Renewal** Audits in 2024, around **3–5%** had nil findings, while about **20–30%** of DOC **Initial/Annual/Renewal** Audits were without any findings.
- It is noted from the above that **5–29%** of the DOC companies have nil findings during **Initial DOC Audits**. This percentage reduces to about **4–5%** during **Annual Audits** and increases to about **18%** during **Renewal Audits**. In a similar trend, the **average number of findings per audit** is maximum between **2.13** at Annual Audits and **1.82** in Renewal Audits.

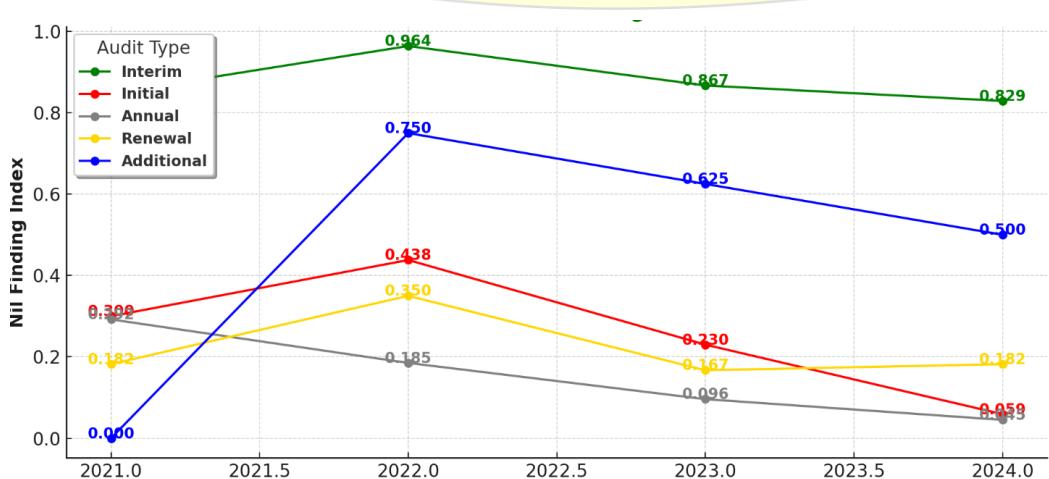


Figure 5. DOC Audits: Trends in Nil Finding Index (2021-2024)

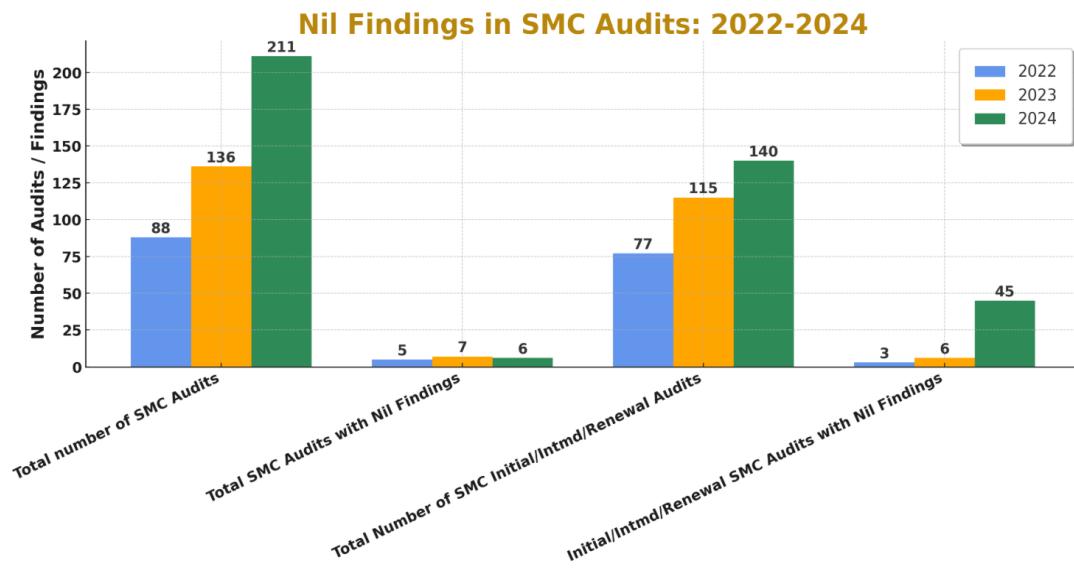


Figure 6. Nil Findings in SMC Audits (2022-2024)

## Average Findings & Nature of Findings in Audits

- i. In 2024, DOC Audits recorded **1.3–1.8 findings per audit**, while SMC Audits averaged **1.7–2.1 findings per audit**, indicating a slight upward trend in SMC findings compared to previous years.
- ii. **DOC Audits:** Clause 10 (*Maintenance of the Ship and Equipment*) continued to account for the highest share of findings at **~24%**, followed by Clause 12 (*Company Verification, Review and Evaluation*) at **~19%** and Clause 11 (*Documentation*) at **~17%**. Clause 1 (*Objectives and Functional Requirements*) maintained a stable share at around **16%**.
- iii. **SMC Audits (2024):** Similar to 2022–2023, Clause 10 remained dominant with **~33%** of findings, Clause 11 contributed **~18%**, and Clauses 7 (*Shipboard Operations*) and 8 (*Emergency Preparedness*) each accounted for **~9–11%** of findings.
- iv. By ship type in DOC audits, **Other Cargo Ships** companies averaged **1.4–1.6 findings per audit**, remaining above most other ship types. Passenger HSC operating companies averaged **1.2–1.5 findings per audit**, consistent with the past two years.
- v. Across DOC audits in 2024, **about 23% of all findings were in Clause 10** of the ISM Code, followed by **~19% in Clause 12** and **~17% in Clause 11**, mirroring the pattern from earlier years

Table 5. Overall Performance of Indian DOC Companies: 2021-2024

Year	Total NC	ISM Clauses												Number of NC/Audit
		1	2	3	4	5	6	7	8	9	10	11	12	
2021	97	16	0	2	0	2	8	4	10	8	23	9	15	1.031
		16.5%									23.7%		15.7%	
2022	112	12	1	2	1	1	14	3	8	14	16	18	22	1.066
		10.7%									14.3%	16.1%	19.6%	
2023	109	14	0	2	1	1	12	7	6	6	26	13	21	1.17
		13.8%									21.1%	12%	19.3%	
2024	189	4	0	3	3	24	14	22	21	4	68	37	5	1.57
						12.6%					35.97%	19.57%		

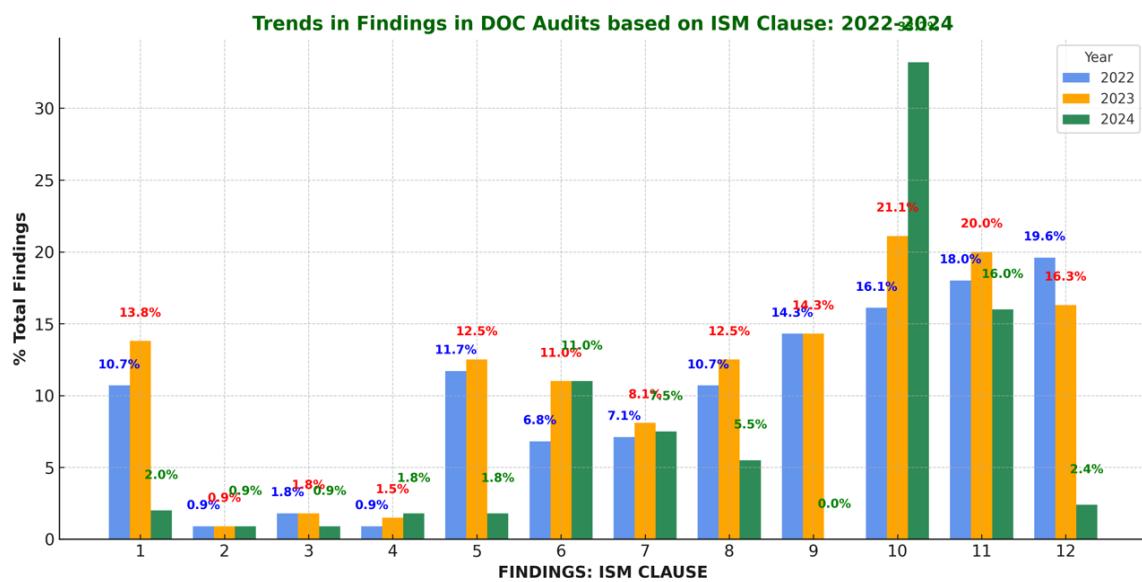


Figure 7. Trends in Findings in DOC Audits based on ISM Clause (2022-2024)

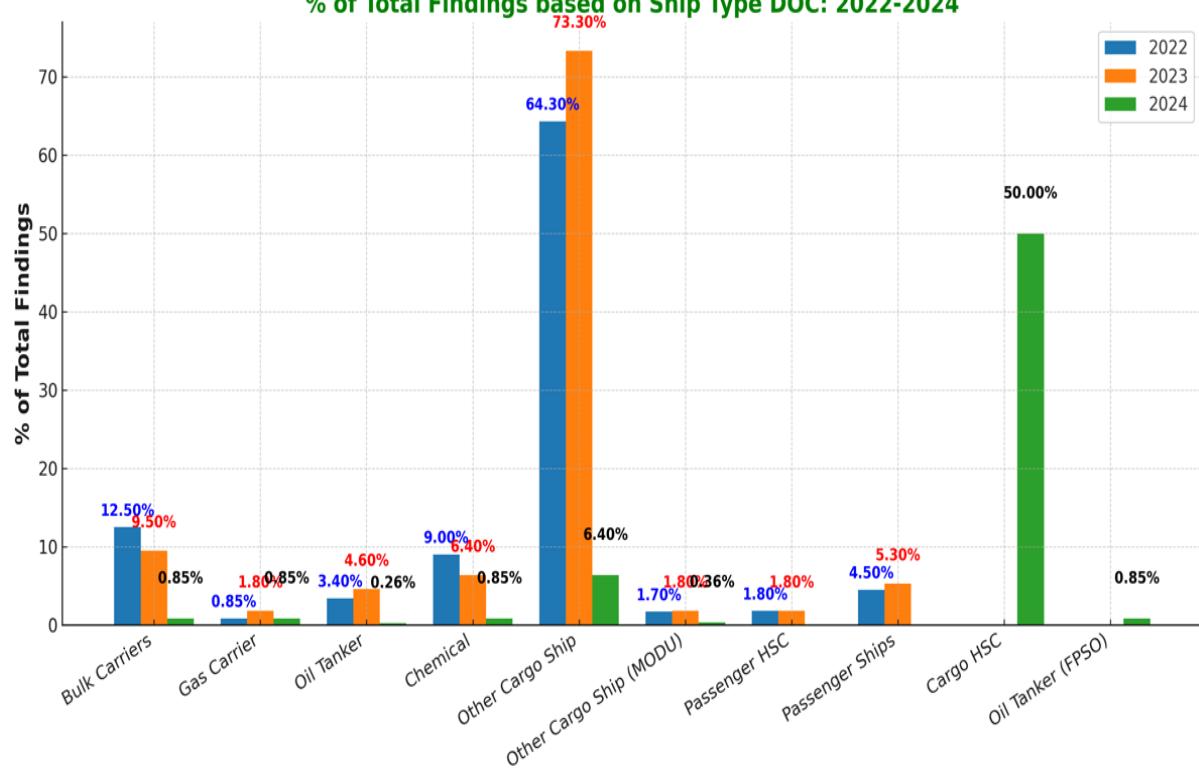


Figure 8. % of total findings based on Ship type Doc 2022-2024

Table 6. Findings in SMC Audits: 2022-2024

Year	Total Number of Audits	Total Number of NCs	NCs/Audit
2022	128	260	2.03
2023	136	257	1.875
2024	211	208	0.98



Table 7. Findings in SMC Audits

ISM Clause	Heading	Total Number		Percentage of total number in year	
		2024	2023	2024	2023
1	Objectives	4	4	1.8%	1.6%
2	Safety and Environmental Protection Policy	0	0	0%	0%
3	Company Responsibilities and Authority	3	5	1.4%	1.9%
4	Designated Person(s)	3	2	1.4%	0.8%
5	Masters Responsibility & Authority	24	24	1.12%	9.3%
6	Resources and Personnel	14	12	6.5%	4.8%
7	Shipboard Operations	22	24	9.8%	9.3%
8	Emergency Preparedness	21	25	9.8%	9.7%
9	Reports and Analysis of Non-conformities, Accidents and Hazardous Occurrences	4	5	1.8%	1.9%
10	Maintenance of Ship & Equipment	68	86	31.9%	33.5%
11	Documentation	37	57	17.3%	22.2%
12	Company Verification, Review and Evaluation	05	13	2.3%	5%
All Total		213	257	100%	100%

## Interim Audits and Findings

- i. **Conversion of DOC Interim Audit to Initial Audit:** An Initial DOC Audit is an indication that the Company acquiring a DOC for a new ship type has taken for management that particular ship type and operated it for at-least 3 Months. An Interim Document of Compliance should be issued for a period not exceeding 12 months. The mismatch between number of Interim audits and Initial Audit is an indication that the new established Company or existing company is unable to acquire that ship type under its management.
- ii. As seen from Interim SMC Audits, about 20% of ships entering in Indian Flag are Container, 20% Oil tanker and 13% Bulk carriers.
- iii. On an average about 82% of all Interim DOC Audits are with findings while about 30% of all Interim SMC Audits in 2024 are with findings.
- iv. Most of the findings in Interim SMC Audits related to ISM Clauses 3, 6,7, 10 & 11

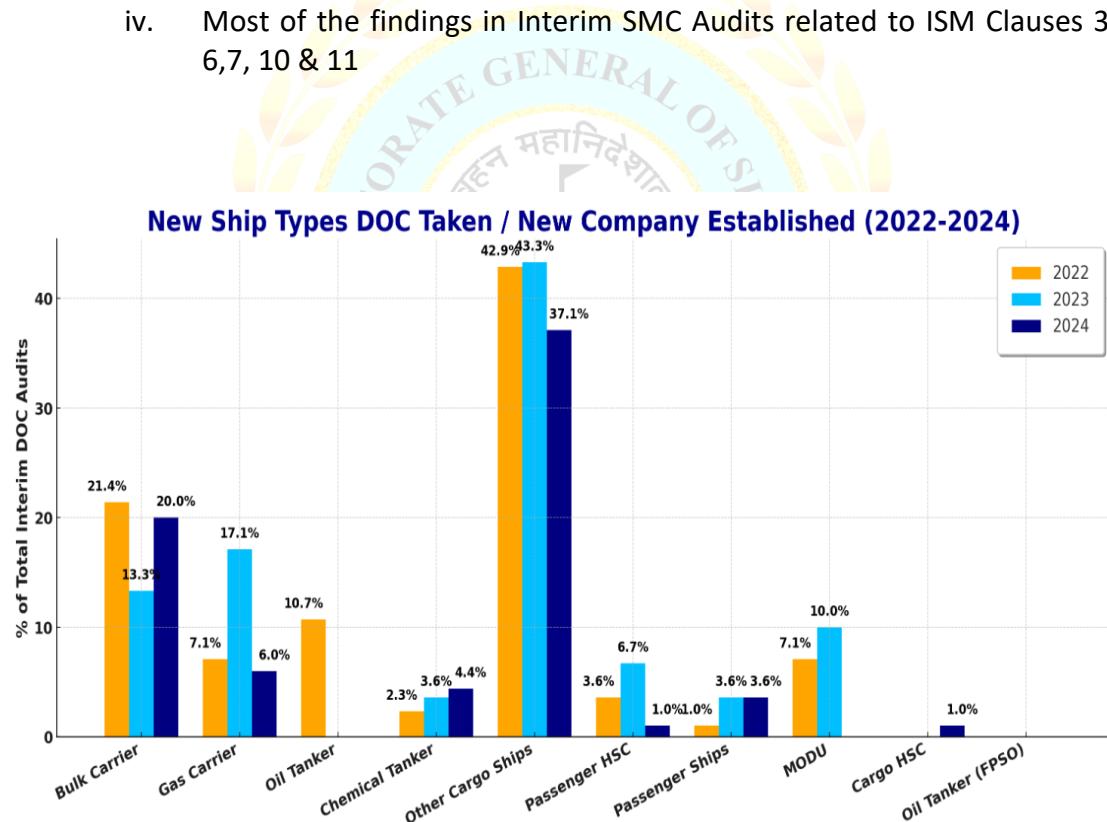


Figure 9. New Ship Types DOC Taken/New Company Established (2022-2024)

Table 8. Interim DOC Audits

Ship Type	2024: Audits based on Ship Type			2023: Audits based on Ship Type			2022: Audits based on Ship Type		
	Total Audits/% Audits with Nil findings	Total NCs	NC/Audit	Total Audits/% Audits with Nil findings	Total NCs	NC/Audit	Total Audits/% Audits with Nil findings	Total NCs	NC/Audit
<b>All</b>	35	3	0.085	30	4	0.133	28	1	0.3
<b>Bulk Carrier</b>	6/83%	1	0.166	4/100 %	0	0	6/100 %	0	0
<b>Gas Carrier</b>	0	NA	NA	0	NA	NA	2/100 %	0	0
<b>Oil Tanker</b>	8/100 %	0	0	5/100 %	0	0	3/100 %	0	0
<b>Chemical Tanker</b>	0	NA	NA	1/100 %	0	0	1/100 %	0	0
<b>Other Cargo Ships</b>	13/100 %	0	0	13/77 %	3	0.23	12/100 %	0	0
<b>Passenger HSC</b>	3/100 %	0	0	2/50%	1	0.5	1/100 %	0	0
<b>Passenger Ships</b>	0	NA	NA	1/100 %	0	0	1/100 %	0	0
<b>MODU</b>	2/50%	2	1	3/100 %	0	0	2	1	0
<b>Cargo High Speed Craft</b>	0	NA	NA	1/100 %	0	0	0	NA	NA
<b>Oil Tanker (FPSO)</b>	0	NA	NA	0	NA	NA	0	NA	NA

Table 9. Conversion Rate of Interim DOC into Initial DOC Audits

Ship Type	Number of Interim Audits in 2024	Number of Initial Audits in 2024	Conversion Ratio of Interim Audits to Initial Audits in 2024	Number of Interim Audits in 2023	Number of Initial Audits in 2023	Conversion Ratio of Interim Audits to Initial Audits in 2023	Number of Interim Audits in 2022	Number of Initial Audits in 2022	Conversion Ratio of Interim Audits to Initial Audits in 2022
Bulk Carrier	6	4	70%	4	2	50%	6	3	50%
Gas Carrier	0	0	0	0	0	NA	2	3	100%
Oil Tanker	5	3	60%	5	1	20%	3	1	33.33%
Chemical Tanker	1	1	100%	1	0	0%	1	0	0%
Other Cargo Ships	13	6	50%	13	5	38.4%	12	7	58.3%
Passenger HSC	3	0	0%	2	1	50%	1	0	0%
Passenger Ships	0	0	0	1	1	100%	1	1	100%
MODU	1	1	100%	2	1	50%	3	2	66.7%
Cargo High Speed Craft	0	0	NA	0	0	NA	1	0	0%
Oil Tanker (FPSO)	0	0	NA	0	0	NA	0	1	100%

Table 10. Interim SMC Audits

Ship Type	2024			2023		
	Total Interim Audits/%	Number of Audits with Nil Findings/%	Number of Findings/Average Findings per Audit	Total Interim Audits/%	Number of Audits with Nil Findings/%	Number of Findings/Average Findings per Audit
All Total	4	0/0%	9/0.44	9/100%	1/11.1%	8/0.89

*Table 11. Nature of Non-Conformities at Interim DOC Audits*

Year	Ship Type issued NC	ISM NC Clause	Number of Ships under this ship type and ISM Clause issued NC	Details of ISM Clause
2024	MODU	1.2.3	1	There is objective evidence to show that few of the Administration / Organization / Classification societies guidelines are not followed.
		7	1	The system was in sufficiently developed in establishing procedure, plan and instruction for key shipboard operation.
	Bulk carrier	1.2.3	2	There is objective evidence to state that the company has not developed suitable documentation to cater to a robust SMS
	Oil tanker	1	3.3	There is objective evidence to show that the Company implemented SMS does not ensure that adequate shore based support, appropriate to the ship-type that the company desires to operate under its management is provided.
2023	Other Cargo ships	7	3	The Company should establish procedures, plans and instructions, including checklists as appropriate, for key shipboard operations concerning the safety of the personnel, ship and protection of the environment. The various tasks should be defined and assigned to qualified personnel.
	Passenger HSC	11	1	As above.

Table 12. Nature of Findings in Interim SMC Audits

Year	Number of Findings	ISM Clause											
		1	2	3	4	5	6	7	8	9	10	11	12
2024	11	2	0	1	0	0	1	1	0	0	1	2	2
2023	8	0	0	3	0	0	0	0	2	0	2	1	0

### Initial/Annual/Renewal DOC Audits

- i. During Initial DOC Audits average findings per Audit is about 1.2 to 1.4, and this figure rises to 1.3-2 during annual and renewal audits.
- ii. More than 50% of all findings are on Other Cargo Ships. This is because the number of Other Cargo Ships in Indian Flag are more than twice the other types.
- iii. However, when considering Average findings per audits it is found that among all ship types except passenger ships, the average findings per audit is that for other cargo ships in the range of 1.8-2.13.

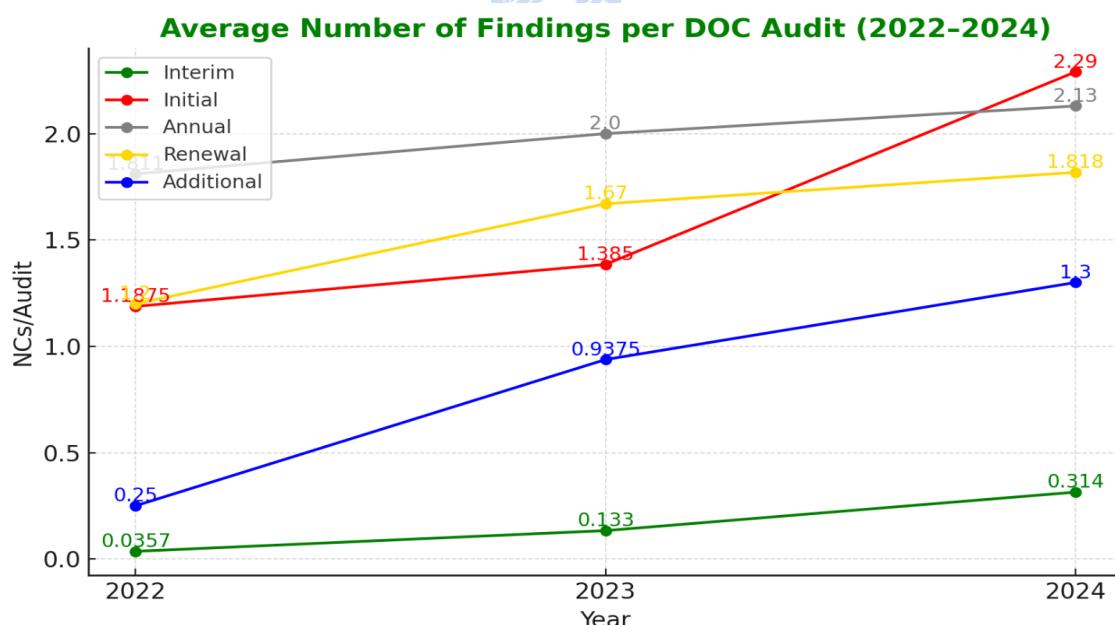


Figure 10. Average Number of Findings per DOC Audit (2022-2024)

Table 13. Initial, Annual and Renewal DOC Audits

Ship Types	2024		2023		2022	
	Number of Audit s with Nil Findi ngs	Number of Ship Type Audits with Nil Findings/Percentage	Number of Audit s with Nil Findi ngs	Number of Ship Type Audits with Nil Findings/Percentage	Number of Audit s with Nil Findi ngs	Number of Ship Type Audits with Nil Findings/Percentage
Bulk Carrier	6	2 (16.66%)	7	0 (0%)	19	3 (15.8%)
		0 (0%)		0 (0%)		2 (10.5%)
		1 (33.33%)		1 (14.3%)		3 (15.8%)
		1(7.6%)		1 (14.3%)		1 (5.3%)
		1 (2.8%)		3 (42.8%)		9 (47.3%)
		1 (25%)		0		1(5.3%)
		0		2 (28.6%)		0

Table 14. DOC Audits: Initial, Annual & Renewal

Ship Type	2024			2023		
	Number of Audits	Number of Findings	Average Findings per Audits	Number of Audits	Number of Findings	Average Findings per Audits
All	72	159	2.2	50	90	1.8
Bulk Carrier	12	25	2.08	5	6	1.2
Chemical Tankers	3	2	0.7	1	2	2
Gas Carriers	13	14	1.1	4	5	1.25
Oil Tankers	3	24	8	5	7	1.4
Other Cargo Ships	35	80	2.3	29	62	2.13
MODU	1	9	9	2	0	0
Passenger	4	3	0.8	1	2	2
Passenger HSC	2	2	1	2	4	2

## Initial/Intermediate/Renewal SMC Audits

- I. There are about 1.8 findings per audit on an average during SMC Initial/Intermediate/Renewal Audits.
- II. During Initial SMC Audits the average number of findings per audit is 1.5 and during renewal, it is about 1.78.
- III. The other cargo ships are noted to have average findings per SMC Audit of more than 2.

Table 15. SMC Audits: Initial, Intermediate & Renewal

Ship Type	2024			2023		
	Number of Audits	Number of Findings	Average Findings per Audits	Number of Audits	Number of Findings	Average Findings per Audits
All	35	58	1.65	115	215	1.87
All Initials	12	18	1.5	62	125	2
All Renewals	28	50	1.78	44	76	1.72
Bulk Carrier	4	4	1	18	29	1.61
Chemical Tankers	0	0	0	2	5	2.5
Gas Carriers	2	1	0.5	3	1	0.33
Oil Tankers	9	7	0.77	20	32	1.6
Other Cargo Ships	11	25	2.27	72	148	2.05

## Performance of Bulk Carriers DOC Companies and Bulk Carrier Ships during Ship Audits

- a) Bulk Carriers DOC Companies have an average audit finding of 1-1.2 per audit in last two years.
- b) The average findings per SMC Audit is noted to be around 1.0.
- c) The maximum findings during DOC Audits were noted to be in Clause 5 and 12 of the ISM Code, while that during SMC noted to be in Clause 10,11 and 12.
- d) Fluyt maritime pvt Ltd and Panbulk marine services pvt Ltd are noted to have more than 2 findings in at-least 1 DOC Audit in last 1-Years.

Table 16. Performances of Bulk Carriers in Audits

Initial/Annual/renewal DOC Audits															
Year	Total Audits/ Audits without findings	Number of Findings	Findings/Audit	ISM Clause											
				1	2	3	4	5	6	7	8	9	10		
2024	12/1	25	2.08	1	0	2	0	0	4	1	1	2	5	4	5
2023	5/0	6	1.2	1	0	0	0	0	0	0	0	0	3	1	1
2022	13/3	14	1.076	1	0	0	0	0	2	0	0	3	1	4	3
Initial/Intermediate/Renewal SMC Audits															
2024	4/1	4	1	0	0	0	0	0	0	0	1	0	1	0	1
2023	18/1	29	1.611	0	0	0	0	3	1	8	1	0	9	5	2

*Table 17. Performance of Bulk Carrier Managing DOC Companies:  
Initial/Annual/Renewal Audits*

Name of Company	2024		2023		2022	
	Total Number of Audits	Number of Findings per Audit	Total Number of Audits	Number of Findings per Audit	Total Number of Audits	Number of Findings per Audit
APEEJAY SHIPPING LTD	1	1	0	0	1	1
ANGLO-EASTERN SHIP MANAGEMENT LIMITED	0	0	0	0	1	0
ASP SHIP MANAGEMENT (I) PVT LTD	0	0	0	0	1	0
Bravo Ship Management Pvt. Ltd.	1	7	1	1	0	0
Equip Trans Logistics Private	1	0	0	0	0	0
Executive ship management pvt ltd	1	1	0	0	1	1
Five Stars Shipping Company Pvt. Ltd	0	0	0	0	1	2
Fluyt Maritime Private Limited	1	4	0	0	0	0
Fleet management pvt ltd	0	0	0	1	0	0

GESCO Ltd.	1	2	0	1	1	0
India cements limited	1	1	0	1	1	0
K" Steamship pvt ltd	0	0	1	3	1	1
Vridhi maritime pvt ltd	1	2	1	1	0	0
TW Ship Management Private Limited	1	2	1	1	1	2
Seavantak Shipping Services Pvt. Ltd	0	0	0	0	0	0
Tolani shipping company limited	1	0	0	0	1	1
Panbulk marine services pvt ltd	1	3	0	0	0	0
Nautilus shipping pvt ltd	1	1	0	0	0	0
SCI Ltd.	0	0	1	2	0	0
Su-Nav Ship Management Pvt. Ltd	0	0	0	0	1	1
T-Erudite Ship Mangers Private Limited	1	1	0	0	1	1

*Table 18. Performance of Indian Bulk Carriers in SMC Initial /Intermediate/ Renewal Audits*

Name of DOC Company	2024				2023			
	Number of Ship Audits	Number of Findings	Findings per Audit	Ship/s with more than Average number of findings	Number of Ship Audits	Number of Findings	Findings per Audit	Ship/s with more than Average number of findings
APEEJAY SHIPPING LTD	0	NA	NA	NA	2	3	1.5	None
ANGLO- EASTERN SHIP MANAGEME NT LIMITED	0	NA	NA	NA	3	2	0.67	None
Equip Trans Logistics Private	0	NA	NA	None	3	8	2.67	PARSHVANA TH IMO No. 9428152
EXECUTIVE SHIP MANAGEME NT PVT. LTD	1	1	1	NA	2	2	1	None
Five Stars Shipping Company Pvt. Ltd	0	NA	NA	None	3	3	1	None
GESCO Ltd.	1	2	2	None	0	NA	NA	NA

INDIA CEMENTS LIMITED	0	NA	NA	None	0	NA	NA	NA
Lighthouse Marine Services India Pvt Ltd	0	NA	NA	Mahavir IMO No. 920949 1	0	NA	NA	NA
SCI Ltd.	2	1	0.5		2	4	2	None
Su-Nav Ship Management Pvt. Ltd	0	NA	NA	NA	1	3	3	Ripley Pride IMO No. 9253832
T-Erudite Ship Mangers Private Limited	0	NA	NA	None	0	NA	NA	NA
TOLANI SHIPPING COMOANY LIMITED	0	NA	NA	NA	2	2	2	-None
TW Ship Management Private Limited	0	NA	NA	TBC Kailash IMO No. 945539 9				None
VRIDHI MARITIME PVT LTD	0	NA	NA	None	1	2	2	None

## Performance of Other Cargo Ships DOC Companies and Other Cargo Ships during Ship Audits

- a. The average findings per DOC (Initial/Annual/Renewal) noted to be in the range of 1.9 to 2.2 in last two years, while that in SMC Audits (Initial, Intermediate, Renewal) noted to be range of 2 to 2.13.
- b. 20% of average findings during DOC Audits noted to be under ISM Clause 10, which is similar in SMC Audits as well.
- c. At-least 12 DOC Companies had 3 findings in at-least 1 audit in last 3 years, while 11 other Companies has at-least 1 audit in last 3 years with more than 3 findings.

Table 19. Other Cargo Ships

Initial/Annual/renewal DOC Audits															
Year	Total Audits/ Audits without findings	Number of Findings	Findings / Audit	ISM Clause											
				1	2	3	4	5	6	7	8	9	10	11	12
2024	35/1	80	2.2	11	1	0	0	0	17	2	5	9	16	9	10
2023	29/3	62	2.13	10	0	1	0	1	7	1	5	4	15	8	10
2022	39/9	71	1.82	6	1	2	1	0	11	3	5	9	11	10	12
Initial/Intermediate/Renewal SMC Audits															
2024	11/2	20	1.9	1	0	1	0	5	1	5	5	1	4	1	0
2023	71/1	147	2.07	1	0	0	2	11	7	10	16	2	50	43	5

*Table 20. Performance of Other Cargo Ships Managing Companies: Initial/ Annual/ Renewal DOC Audits*

Name of Company	2024		2023		2022	
	Total Number of Audits	Number of Findings per Audit	Total Number of Audits	Number of Findings per Audit	Total Number of Audits	Number of Findings per Audit
ABS Marine Services Pvt Ltd	0	0	1	3	1	3
Adani ports and special economic	0	0	2	0	1	0
Adsun offshore diving contractors pvt ltd	1	1	0	NA	1	2
Allianz offshore services private limited	1	3	0	NA	1	3
Amber shipping & logistics pvt ltd	0	0	0	NA	0	NA
Ambuja cements limited	0	0	1	2	0	NA
Albastross marine services	0	0	1	1	0	NA
ASP Ship management	1	6	0	0	0	0
Columbia Aurus Ship Management Pvt. Ltd	1	6	0	0	0	0
Dredging corporation of india ltd	1	2	1	4	2	2.5
Delta maritime & industrial skill training institute Pvt. Ltd.	0	0	1	3	0	NA
Equip trans logistics private	1	3	0	NA	0	NA
Essar shipping limited	0	0	0	NA	0	NA
First oil and gas services Pvt ltd	0	0	0	NA	1	5

Global offshore services limited	0	0	1	2	0	NA
Greatship (india) limited	1	3	0	NA	1	0
Hal offshore limited	1	2	1	2	1	2
Hind offshore pvt ltd	1	1	0	NA	1	4
Hoger offshore & marine Pvt.ltd	0	0	1	2	0	NA
Igopl offshore private limited	1	3	1	2	1	2
Itt shipping pvt ltd	1	3	1	1	1	1
L & T SAPURA SHIPPING PVT LTD	0	0	1	0	1	0
Lakshadweep Development Corporation Ltd	0	0	1	1	0	NA
Libra ship management Pvt ltd	1	2	1	2	1	1
Lighthouse marine services India private limited	0	0	1	1	1	0
Lilly maritime Pvt ltd	0	NA	12	6	1	2
Mak logistics (Pvt) ltd.	0	0	0	NA	1	1
Mat marine services pvt. Ltd.	1	2	1	3	0	NA
Mj marine services pvt ltd	1	2	1	2	1	2
Ocean sparkle ltd. Hyderabad	1	3	0	NA	1	2
Ogen ship management pvt ltd	1	1	0	NA	0	NA
Peninsular maritime india pvt. Ltd.	0	0	1	4	0	4
Penna shipping limited	0	0	1	1	0	NA
Proactive ship management pvt. Ltd.	1	2	1	5	1	4
Raj shipping agencies ltd	1	2	1	3	0	NA
Reliance industries limited	0	0	0	NA	0	NA

Sadhav shipping limited	1	2	0	NA	1	3
Sai maritime & management (p) ltd	0	0	0	NA	0	NA
Samson maritime ltd	0	0	0	NA	1	2
Sanmar shipping ltd	0	0	0	NA	0	NA
Seamec limited	1	4	0	NA	1	0
Seaport shipping pvt ltd	1	2	0	NA	2	1.5
Shivansh offshore pvt ltd	0	0	0	NA	1	1
Sima maritime india pvt.ltd	0	0	0	NA	0	NA
Sonar maine consultant pvt. Ltd.	0	0	2	2	0	NA
S s offshore pvt ltd	0	0	1	2	0	4
Suchna marine services pvt. Ltd	0	0	0	NA	2	2
Supreme hydro engineering pvt ltd	0	0	0	NA	1	0
Sushe marine services pvt ltd	0	0	0	NA	1	2
Synergy oceanic services india pvt ltd	0	0	0	NA	0	NA
TCI Seaways	0	0	1	1	1	3
Triton Maritime Private limited	0	0	0	NA	1	3
Tw ship management pvt ltd	0	0	1	1	1	1
Van oord india pvt ltd	1	0	1	2	0	0
Varuni marine services	1	1	0	NA	1	2
Vision maritime pvt ltd	1	3	1	3	1	0
Vridhi maritime private limited	0	0	0	NA	0	0
VR maritime pvt ltd	1	1	0	0	0	0

- Columbus Aurus and Seamac managed ships are found with more than 3 findings in each SMC Audits

Table 21. Performance of other cargo ships: SMC initial/Annual/Renewal Audits

Name of DOC Company	2024				2023			
	Number of Ship SMC Audits	Total Findin gs	Findin gs per Audit	Ship with higher number of deficiencies (3 & above)	Number of Ship SMC Audits	Total Findin gs	Findin gs per Audit	Ship with higher number of deficiencies (3 & above)
ABS MARINE SERVICES PVT. LTD.	1	1	1	NA	3	6	2	SAGAR NIDHI IMO No. 9384485 with 3 findings
ADANI PORTS AND SPECIAL ECONOMIC	0	0	0	None	0	NA	NA	NA
Adsun Offshore Diving Contractors Pvt. Ltd.	2	7	3.5	NA	1	1	1	None
Albatross Marine Services	0	0	0	NA	2	3	1.5	None
Allianz Offshore Services Private Limited	0	0	0	None	0	NA	NA	NA
Amber Shipping & Logistics Private Limited	7	15	2.14	Malaviya 6 IMO No. 9249215 6 Findings	4	12	3	MALAVIYA EIGHTEEN IMO no. 9249427 with 4 findings and MENCAST 18 & PFS Supplier with 3 findings each.
Ambuja Cements Limited	6	9	1.5	None	0	0	0	0
DCI Limited	0	0	0	DCI Dredge X IMO No. 9217292	1	2	2	

Delta Maritime & Industrial Skill Training Institute Pvt. Ltd.	1	1	1	0	0	0	0	0
Dawn Shipping Private Ltd.	1	0	0	0	0	0	0	0
Equip Trans Logistics Private Limited	2	2	1	NA	1	3	3	SAMARTH IMO No. 9415363 with 3 findings
Executive ship management pvt ltd	1	0	0	0	0	0	0	
Five star shipping co ltd	1	0	0	0	0	0	0	
Fleet management pvt ltd	1	2	2	0	0	0	0	
Fluyt maritime pvt ltd	6	5	0.8	0	0	0	0	
Global Offshore Services Ltd.	1	0	0	COASTAL SATTHWA IMO No. 9509205	1	2	2	None
Great ship India	1	2	2	None	5	6	1.2	GREATSHIP RACHNA IMO No. 9607332 with 3 findings
GESCO	18	8	0.4	0	0	0	0	0
Gauri hari marine services pvt ltd	5	6	1.2	0	0	0	0	
Hal Offshore Limited	2	2	1	None	2	5	2.5	HAL SUPPORTER IMO No. 8129096

								with 3 findings
Hind Offshore Pvt Ltd.	0	NA	NA	NA	2	6	3	SUMAI TANGKAS IMO No. 8026476 with 4 findings
Hoger Offshore & Marine Pvt Ltd	10	10	1	PFS Supplier IMO No. 9221176 with 6 findings	5	10	2	K. D. MALAVIYA & N.B Prasad with 3 findings each
IGOPL Offshore Pvt. Ltd.	0	NA	NA	NA	1	3	3	Wil Chief 1 with 3 findings
ITT Shipping (Private) Limited	0	NA	NA	NA	1	1	1	None
Lilly Maritime Pvt. Ltd.	0	0	0	None	0	NA	NA	NA
L & T Sapura Shipping Pvt. Ltd	0	NA	NA	NA	1	1	1	None
Mak Logistics (P) Limited	0	0	0	None	0	NA	NA	NA
M J Marine Services Private Limited	3	4	1.3	None	5	14	2.8	3 out of 4 ships, that is, VMS 21. VMS 6 & VMS 3 & Meenakashi
Mat Marine Services Private Limited	0	NA	NA	NA	1	2	2	None
Ocean Sparkle Limited	0	NA	NA	NA	1	2	2	None
OCS SERVICES (INDIA) PVT. LTD.	0	NA	NA	NA	1	2	2	None
Peninsular Maritime	0	0	0	0	1	2	2	None

India Pvt. Ltd								
Panbulk marine services	6	10	1.7	0	0	0	0	0
Proactive Ship Management Pvt. Ltd.	0	0	0	0	4	7	1.75	THERA IMO No. 9351177 with 3 findings
Raj Shipping Agencies Ltd	0	0	0	0	1	2	2	None
S.S OFFSHORE PRIVATE LIMITED	0	0	0	0	1	1	1	None
SCI	14	19	1.35	0	0	0	0	0
Samson Maritime Limited	2	3	1.5	0	3	7	2.33	OCEAN GARNET & Ocean Citrine with 3 findings each
SEAMEC LIMITED	0	0	0	None	2	3	1.5	None
Seaport Shipping Private Limited	0	0	0	None	1	2	2	None
Shivansh Offshore and Marine Services Pvt. Ltd.	0	NA	NA	NA	3	9	3	SHIVANSH IMO No. 9303637 with 6 findings
Sima Marine (India) Pvt. Ltd.	0	0	0	None	0	NA	NA	NA
Sonar Marine Consultant Pvt Ltd	0	NA	NA	NA	1	1	1	None
Sushe Marine Services Private Ltd.	0	02	0	None	0	NA	NA	NA

Suchna Marine Services Private Limited	3	5	1.7	NA	4	7	1.75	P. R. NAYAK with 3 findings.
SCI Ltd.	6	10	1.67	SCI PANNA IMO No. 9524889 with 3 findings	4	5	1.25	None
TCI Seaways	1	1	1	None	1	1	1	None
Triton Maritime Private Limited.	0	NA	NA	NA	1	3	3	TRITON HARMONY with 3 findings
TW Ship Management Private Limited	15	20	1.3	SSL BHARAT IMO no. 9141314 with 4 findings and SSLSabrimala, with 2 findings	3	8	2.67	SSL GANGA and SSL BRAHMAPUT RA with 3 findings each
VIRIDIAN MARITIME PTE. LTD.	1	2	2	None	0	NA	NA	NA
Vision Maritime Private Limited	1	2	2	None	0	NA	NA	NA
Vindhyawas hini Offshore Services Pvt. Ltd.	0	NA	NA	NA	3	8	2.67	KPS SHIVALI with 4 findings

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## Performance of Oil Tanker Ships DOC Companies and Oil Tankers Ships during Ship Audits

Table 22. *Performance of Oil Tankers Managing Companies:  
Initial/Annual/Renewal Audits*

Name of Company	2024		2023		2022	
	Total Number of Audits	Number of Findings per Audit	Total Number of Audits	Number of Findings per Audit	Total Number of Audits	Number of Findings per Audit
Asmi ships private limited	1	2	1	1	0	NA
Aza shipping pvt.ltd	1	3	1	2	0	NA
Bravo ship Mangement Pvt Ltd	1	1	1	0	0	NA
Castle ships ltd.	6	0	1	2	0	NA
Dawn shipping private limited	3	2	0	NA	1	3
Gesco ltd.	1	2	0	NA	1	1
Fleet management india pvt ltd	2	3	0	NA	1	0
LDCL corporation	1	2	0	0	0	0
OCS services pvt ltd	1	2	0	0	0	0
Sanmar shipping ltd	0	NA	0	NA	1	1
Sea breeze ship management pvt ltd	1	3				
Seven islands shipping ltd	1	4	1	2	0	NA
Shane marine services pvt ltd	1	1	0	NA	1	5
Synergy oceanic services india pvt ltd	1	2	0	NA	0	NA

- Four vessels in last 2-Years had at-least 3 findings as below and at-least two belong to same Company Seven Island.

Table 23. SMC initial/Annual/Renewal Audits

Name of DOC Company	2024				2023			
	Number of Ship SMC Audits	Total Findings	Finding s per Audit	Ship with higher number of deficiencies ( 3 & above)	Number of Ship SMC Audits	Total Findings	Finding s per Audit	Ship with higher number of deficiencies ( 3 & above)
Bravo Ship Management	0	NA	NA	NA	1	1	1	None
Castle Ships Pvt. Ltd	0	0	0	None				
Dawn Ship Management Pvt. Ltd.	0	NA	NA	NA	3	7	2.33	DAWN MANSAR OVAR with 3 findings
GESCO Ltd.	0	0	0	None	4	5	1.25	None
Sanmar Shipping Ltd.	0	0	0	None	2	0	0	None
Seven Islands Shipping Ltd	4	8	2	Success had 3 findings in last SMC Audit	3	7	2.33	CORONET with 3 findings
Shane Marine Services Private Limited	0	NA	NA	None	1	1	1	None
SCI Ltd.	3	8	2.66	Desh Vishal has 3 findings in last SMC Audit	6	11	1.833	None
Seven islands shipping	1	4	4	0	0	0	0	0

## Performance of Passenger HSC DOC Companies

Table 24. *Performance of Passenger HSC Managing Companies:  
Initial/Annual/Renewal Audits*

Name of Company	2024		2023		2022	
	Total Number of Audits	Number of Findings per Audit	Total Number of Audits	Number of Findings per Audit	Total Number of Audits	Number of Findings per Audit
ITT SHIPPING PVT LTD	1	1	1	2	1	1
Lakshadweep Development Corporation Ltd	6	7	1	2	0	NA
Mak Logistics (Pvt) Ltd	1	0	0	NA	1	2
PROACTIVE SHIP MANAGEMENT PVT LTD	0	NA	0	NA	1	3
SCI Ltd.	3	3	0	NA	0	NA
SONAR MARINE CONSULTANT PVT LTD	0	0	0	NA	0	NA

## Performance of Passenger Ship DOC Companies

Table 25. *Performance of Passenger Ships Managing Companies: Initial/ Annual/ Renewal Audits*

Name of Company	2024		2023		2022	
	Total Number of Audits	Number of Findings per Audit	Total Number of Audits	Number of Findings per Audit	Total Number of Audits	Number of Findings per Audit
Castle Ships Pvt. Ltd.	0	NA	1	NA	1	1
Lakshadweep Development Corporation Ltd	0	NA	1	2	0	NA
SCI LTD	1	1	0	NA	2	4
SONAR MARINE CONSULTANT PVT LTD	0	NA	0	NA	1	0



## Performance of Chemical Tanker Ships DOC Companies and Chemical Tankers Ships during Ship Audits

Table 26. Performance of Chemical Tankers Managing Companies: Initial /Annual/ Renewal Audits

Name of Company	2024		2023		2022	
	Total Number of Audits	Number of Findings per Audit	Total Number of Audits	Number of Findings per Audit	Total Number of Audits	Number of Findings per Audit
Asmi Ships Private Limited	0	NA	1	2	0	NA
Dawn ship management	3	1	0	NA	0	NA
Fleet management india pvt ltd	0	NA	0	NA	1	0
Gesco Ltd.	0	NA	0	NA	1	0
Reliance industries limited	0	NA	0	NA	1	1

Table 27. SMC initial/Annual/Renewal Audits

Name of DOC Company	2024				2023			
	Number of Ship SMC Audits	Total Findings	Findings per Audit	Ship with higher number of deficiencies ( 3 & above)	Number of Ship SMC Audits	Total Findings	Findings per Audit	Ship with higher number of deficiencies ( 3 & above)
Asmi Ships Private Limited	0	NA	NA	None	0	0	NA	None
GESCO Ltd.	0	NA	NA	None	1	2	2	None
Seven Island	0	NA	NA	None	1	3	3	FALCONS had 3 findings

## Performance of Gas Carriers Ships DOC Companies and Gas Carriers Ships during Ship Audits

Table 28. *Performance of Gas Carrier Managing Companies:  
Initial/Annual/Renewal Audits*

Name of Company	2024		2023		2022	
	Total Number of Audits	Number of Findings per Audit	Total Number of Audits	Number of Findings per Audit	Total Number of Audits	Number of Findings per Audit
MOL TANKSHIP MANAGEMENT PTE LTD	0	NA	1	1	1	0
Dwan Shipping Private Limited	0	NA	1	3	0	NA
GESCO Ltd.	0	NA	0	NA	1	0
Gaslite Ship Management Private Limited	0	NA	1	0	0	NA
SCI Ltd.	0	NA	0	NA	1	1
SEVEN ISLANDS SHIPPING LTD	0	NA	1	1	1	0
SANMAR SHIPPING LTD	0	NA	0	NA	1	1
Synergy oceanic services	2	1	0	0	0	0

Table 29. SMC initial/Annual/Renewal Audits

Name of DOC Company	2024				2023			
	Number of Ship SMC Audits	Total Findings	Findings per Audit	Ship with higher number of deficiencies ( 3 & above)	Number of Ship SMC Audits	Total Findings	Findings per Audit	Ship with higher number of deficiencies ( 3 & above)
Gaslite Ship Management Private Limited	0	NA	NA	None	1	1	1	None
GESCO	1	0	NA	0	NA	NA	NA	NA
MOL Tankship Management Pte. Ltd.	0	NA	NA	None	NA	NA	NA	None
MOL Nippon India Ship Management Pvt Ltd	1	0	0	None	NA	NA	NA	None
Reliance Industries Limited	0	NA	NA	None	2	0	0	None
Sanmar Shipping Ltd.	1	2	2	None	0	NA	NA	None

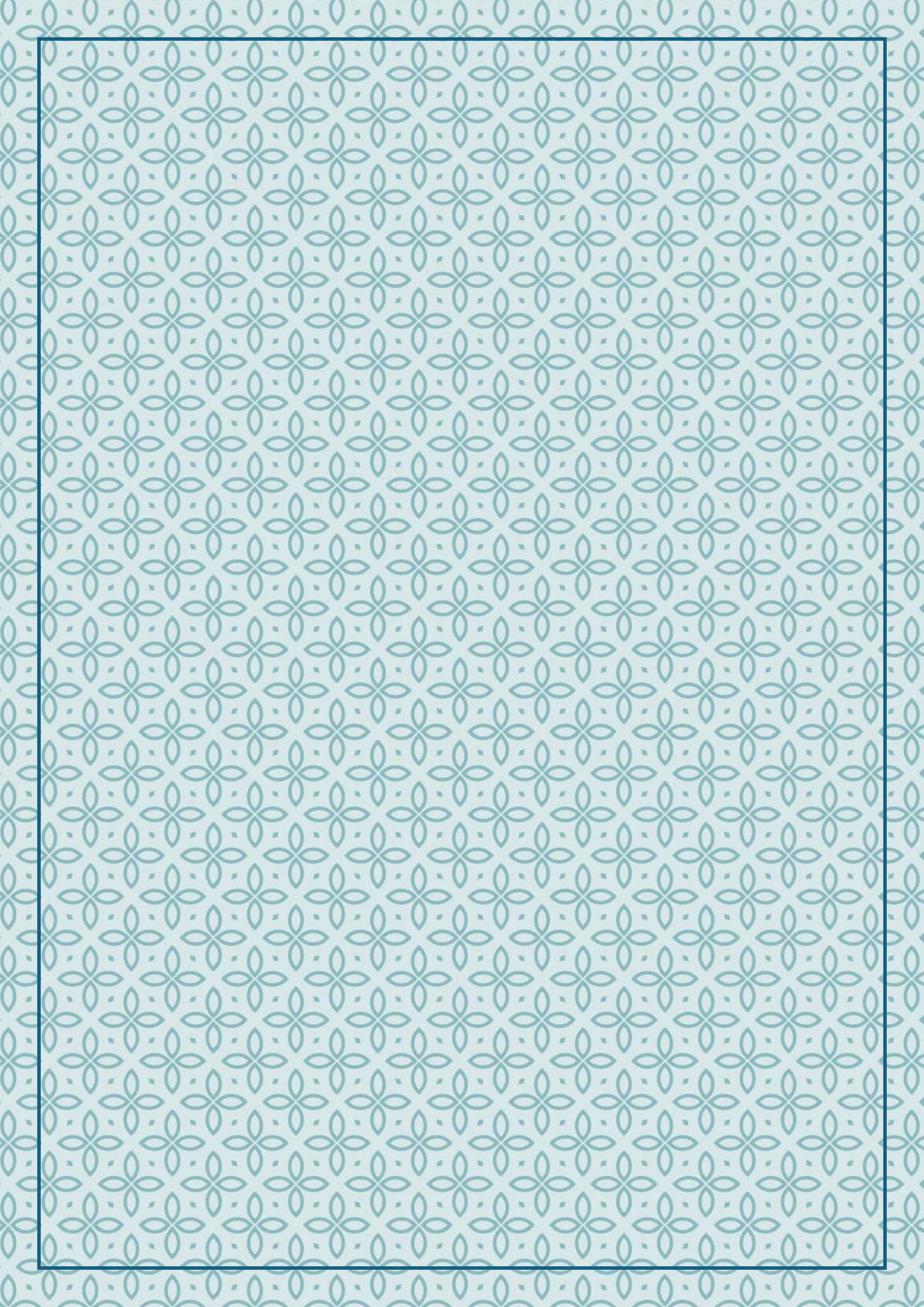
## Additional DOC Audits

Table 30. Additional DOC Audits

Year	Name of Company	Reason for Audit/Ship Type	Number of Findings	Findings Areas (ISM Clauses)
2021	Seavantak Shipping Services Pvt.Ltd	Change of Address/Other Cargo Ship	3	12.6, 11.2.1, 10.3
2022	SS Offshore Pvt. Ltd.	Follow up of Initial Audit/Other Cargo Ship	1	1.4
2022	ASP SHIP MANAGEMENT (I) PVT LTD	Change of Address/Bulk Carrier	0	NA
2022	COLUMBIA AURUS SHIP MANAGEMENT PVT. LTD	Change of Address/Other Cargo Ship	0	NA
2022	MOL NIPPON SHIP INDIA MANAGEMENT PVT LTD	Change of Address/ Gas Carriers	0	NA
2023	Adani Ports and Special Economic Zone Limited	Change of Address/Other Cargo Ship	0	NA
2023	Synergy Oceanic Services India Pvt. Ltd	Change of Address/Other Cargo Ship	0	NA
2023	Synergy Oceanic Services India Pvt. Ltd	Change of Address/ Oil Tankers	0	NA
2023	Synergy Oceanic Services India Pvt. Ltd	Change of Address/ Gas Carriers		

2023	Delta Maritime & Industrial Skill Training Institute Pvt. Ltd	Change of Address/Other Cargo Ship	3	1.4.2, 3, 6.5
2023	Bravo Ship Management Pvt Ltd	Change of Address/Bulk Carrier	0	NA
2023	Bravo Ship Management Pvt Ltd	Change of Address/ Oil Tankers	0	NA
2023	Anglo Eastern Ship Management (India) Private Limited	Change of Address/Bulk Carrier	0	NA
2023	Anglo Eastern Ship Management (India) Private Limited	Change of Address/Other Cargo Ship	0	NA
2023	Peninsular Maritime India Pvt Ltd	Change of Address/Other Cargo Ship	4	9.2, 10.2, 12.2, 12.4
2023	Hal Offshore Limited	Measures imposed by DGS after issuance of Show cause notice/Other Cargo Ships	3	12, 10.2, 11
2023	ProActive Ship Managemet Pvt. Ltd	Recommendation of the Annual DOC Audit towards the Ineffective implementation of previous audit CA/PA/ Other Cargo Ship	2	6,7
2023	Mak Logistics P Ltd	Change of Address/Other Cargo Ship	0	0

2023	Mak Logistics P Ltd	Change of Address/Passenger Ship	0	0
2024	M/s ABS Marine Services Pvt Ltd.	Name Changing from company name listing	2	6.5
2024	IGOPL Offshore Pvt. Ltd.	Change of Address	NIL	NA
2024	Shane Marine Services Private Limited	Change of Address	NIL	NA
2024	Anglo-Eastern Ship Management (India) Private Limited	As directed by DGS and found the SMS of the company has been implemented onboard the four vessels managed by the company.	2	1.2.3.2/10.2.3
2024	Fleet Mangement India Pvt. Ltd.	Due to raised non-conformity No- 1	3	1.2.3/12.1/1 1.2
2024	Samundar Manthan Offshore India Pvt. Ltd.	Change of company name	NIL	NA
2024	Allianz Offshore Services Private Limited	Change of Address	3	11/6/10
2024	Vidhyashwini Offshore Services Pvt. Ltd.	Change of Address	3	12.2/12.1/6.3
2024	Equiptrans Logistics Private Limited	Change of Address	NIL	NA



# Chapter III: Report of MLC Inspections: 2024-2025

## Analysis of Compliance to Maritime Labor Convention

1. In 2024 on an average 330-400 MLC inspections are conducted every year. Nearly 1/3<sup>rd</sup> of these inspections are initial inspections and about 40% renewal inspections. 25% to 30% of all inspections are on other cargo ships.
2. The percentage of inspections without any deficiencies has shown a slight decrease with 84% in 2023 to about 81.5% in 2024 indicating a slight decrease in compliance by ships. The Nil deficiency ratio (Number of Inspections without deficiencies ÷ Total Number of Inspections) is around 0.60 ; Higher this index, means more and more ships are found 100% compliant with MLC, there is also a reduction in deficiency ratio (Total Number of Deficiencies ÷ Total Number of Inspections; Higher this index, more are the number of deficiencies per ships) from 0.23 in 2023 to 0.31 in 2024 indicating a slight dip in compliance.
3. In both the areas, that is, Seafarer Employment Agreement and Accommodation and Recreational Facilities, the deficiencies have ranged from 20-40% in last Year for each of these areas and thus constitute the areas of concern.
4. Non-payment of wages also ranges from 10% of all deficiencies last year. However, it is noted that deficiencies are replication of Regulations and does not reflect the areas of concern and the wages issues considering the number of complaints is either not identified or not identified properly on paper and require to be re-addressed in future inspections. Majority of deficiencies related to wages and SEA are found on other cargo ships such as Multipurpose OSV, Offshore support vessel, OSV, MSV.
5. 90% of General Cargo ships and Container vessels in the year 2024 have demonstrated nil deficiencies in more than 80% of all inspections.
6. In last 1-Year on an average 330-400 MLC inspections are conducted every year. Nearly 1/3<sup>rd</sup> of these inspections are initial inspections and about 40% renewal inspections. 25% to 30% of all inspections are on other cargo ships.
7. The percentage of inspections without any deficiencies has shown a slight decrease with 84% in 2023 to about 81.5% in 2024 indicating a slight decrease in compliance by ships. The Nil deficiency ratio (Number of Inspections without deficiencies ÷ Total Number of Inspections) is around 0.60 ; Higher this index, means more and more ships are found 100% compliant with MLC, there is also a reduction in deficiency ratio (Total Number of Deficiencies ÷ Total Number of Inspections; Higher this index, more are the number of deficiencies per ships) from 0.23 in 2023 to 0.31 in 2024 indicating a slight dip in compliance.

8. In both the areas, that is, Seafarer Employment Agreement and Accommodation and Recreational Facilities, the deficiencies have ranged from 20-40% in last Year for each of these areas and thus constitute the areas of concern.

9. Non-payment of wages also ranges from 10% of all deficiencies last year. However, it is noted that deficiencies are replication of Regulations and does not reflect the areas of concern and the wages issues considering the number of complaints is either not identified or not identified properly on paper and require to be re-addressed in future inspections. Majority of deficiencies related to wages and SEA are found on other cargo ships such as Multipurpose OSV, Offshore support vessel, OSV, MSV.

10. 90% of General Cargo ships and Container vessels in the year 2024 have demonstrated nil deficiencies in more than 80% of all inspections.

- i. No. of the ships in any age grouping is noted to have an average deficiency index of more than 0.2 for the year 2024. However, year to year variation in average deficiency index is indicative of variation in maintenance of ships within each age grouping and thus no inference can be drawn.
- ii. The **Oil Tankers** performed fairly well with 81% of total inspections resulting in Nil deficiency. The major areas requiring attention are seafarer agreement, accommodation and wage payment.
- iii. The performance of **Chemical Tankers** since 2023 has improved and is present nearer to performance of average Indian ships inspected. The main areas of concern are SEA related deviation.
- iv. The **Other Cargo Ships (AHTS, AHTS/Supply, AHTS/Tug, Offshore Support, Supply, Multi-Purpose Supply, and Diving Support)** have performed below the average performance of all ships with nil deficiency index of about 0.8 compared to same being about 0.85 for all Indian ships, that is, below the average of all Indian ships and also with a higher number of deficiencies per ship than that for an average Indian ship, that is about 0.4 to 0.5. The main areas requiring attention are: Seafarer wages, Seafarer employment agreement and accommodation and recreational facilities.
- v. The performance of **Gas Carriers** are much above the average Ship inspected in each of last 3-Years with hardly any areas of concern.
- vi. The performance of Other Cargo (Buoy, Floating Crane, Lighthouse Vessel, Patrol Boat, Pilot, survey Launch, Trailing suction Barge, Research Vessel, Oil Barge) are much above the average Ship inspected in each of last 3-Years with hardly any areas of concern.

- vii. Considering the small size of **Other Cargo ships (Crew Boat, Utility Vessel, Work Boat)**, the performance of these ships are outstanding Indian ship inspected in 2024.
- viii. Considering the complex nature of Dredgers, the performance of these ships are nearer to the average Indian ship inspected in the year 2024 with 3 deficiencies.
- ix. The average performance of **Container Ship** is higher than that of average Indian ship with nil deficiency ratio of 0.9 as compared to 0.85 of average Indian ship and the deficiency ratio is in range of 0.1 and is above that of average Indian ship. The main areas requiring attention are: Accommodation recreation facilities, food and catering.
- x. The **General Cargo Ships** have performed better than the average performance of all ships with nil deficiency index above the average and also with reduced number of deficiencies per ship. The main areas requiring attention are: Accommodation and recreational facilities.
- xi. The Cement Carrier Ships have performed nearly same as average Indian ship in 2024.
- xii. Tugs have performed fairly better Considering that these vessels constitute almost 40% of all Indian ships in numbers, this is a huge concern. The other concerns are related to Accommodation and recreational facilities, Seafarers' employment agreements and Health and safety protection and accident prevention.

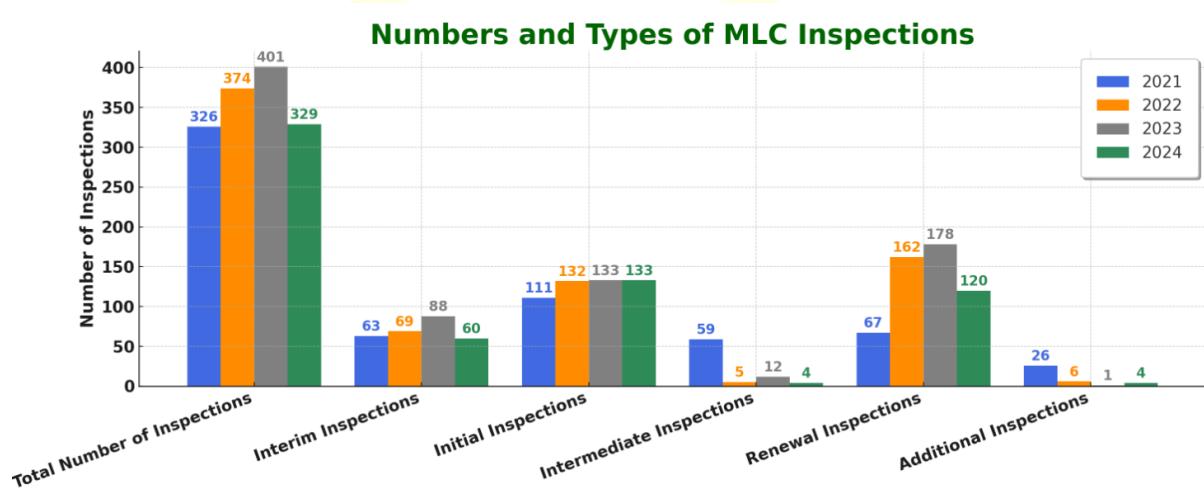


Figure 11. Number of MLC Inspections: Last 4-Years

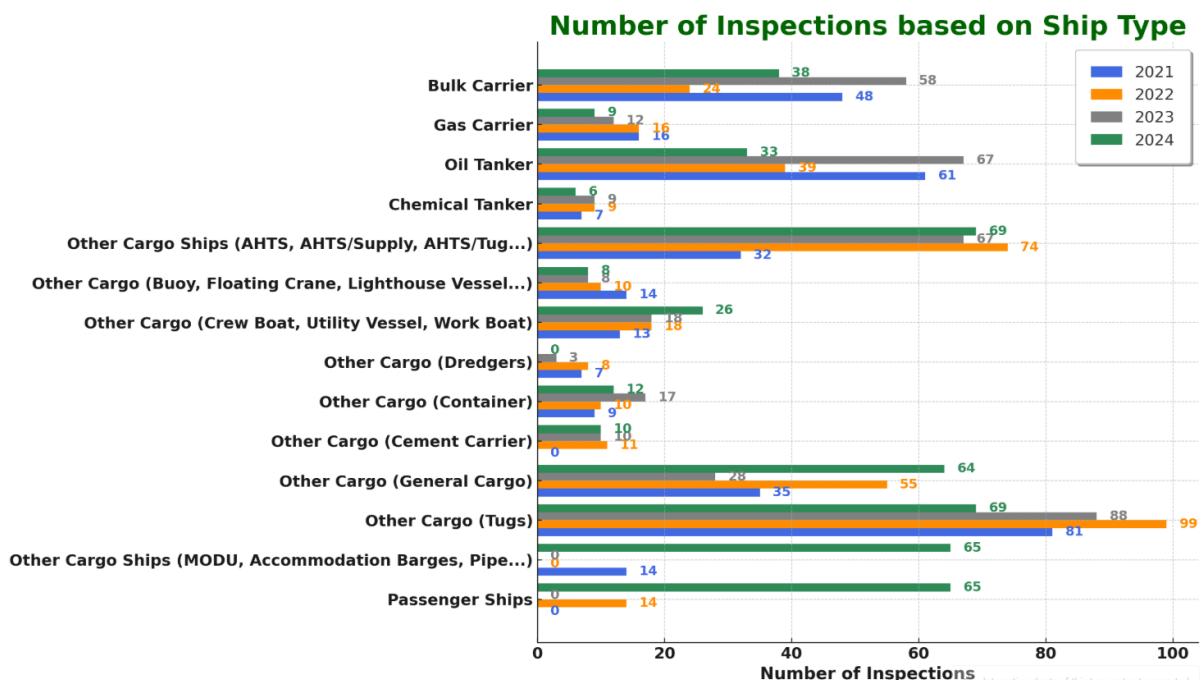


Figure 12. Number of Inspections based on Ship Type

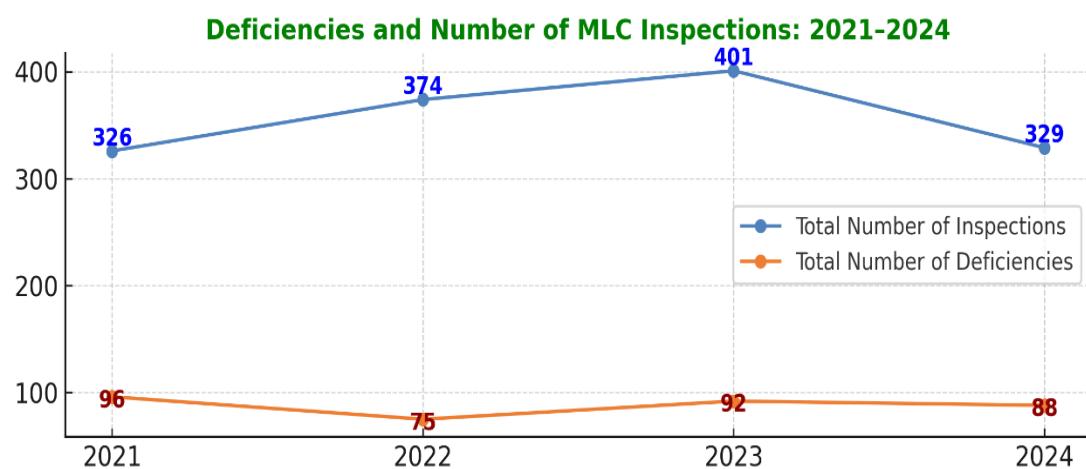


Figure 13. Deficiencies and number of MLC Inspection: 2021-2024

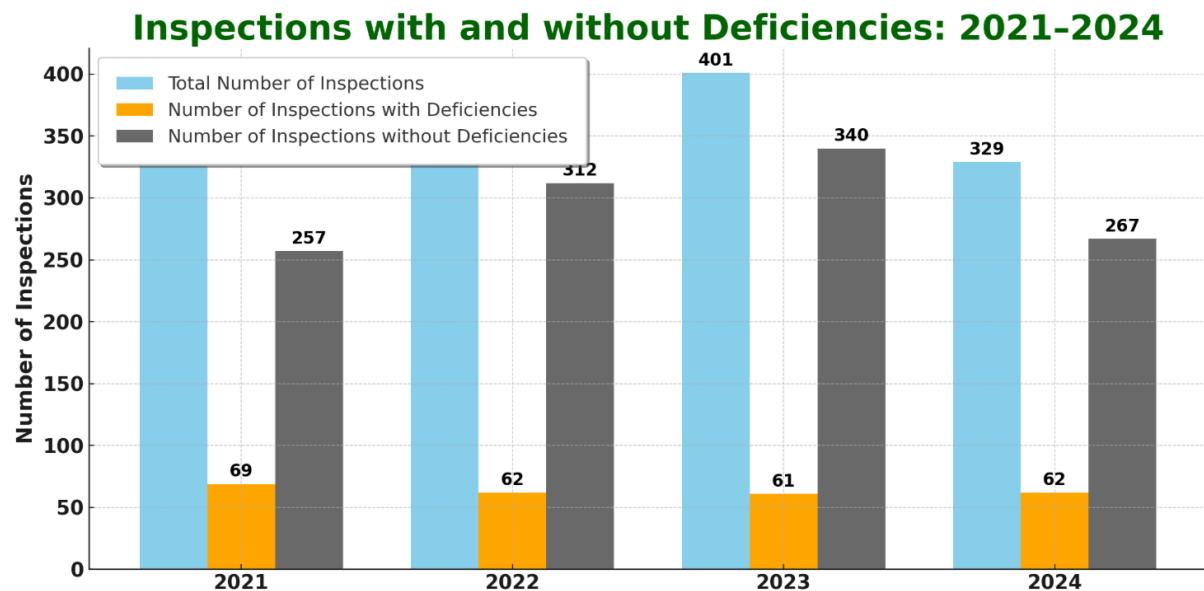


Figure 14. Inspections with and without Deficiencies: 2021-2024

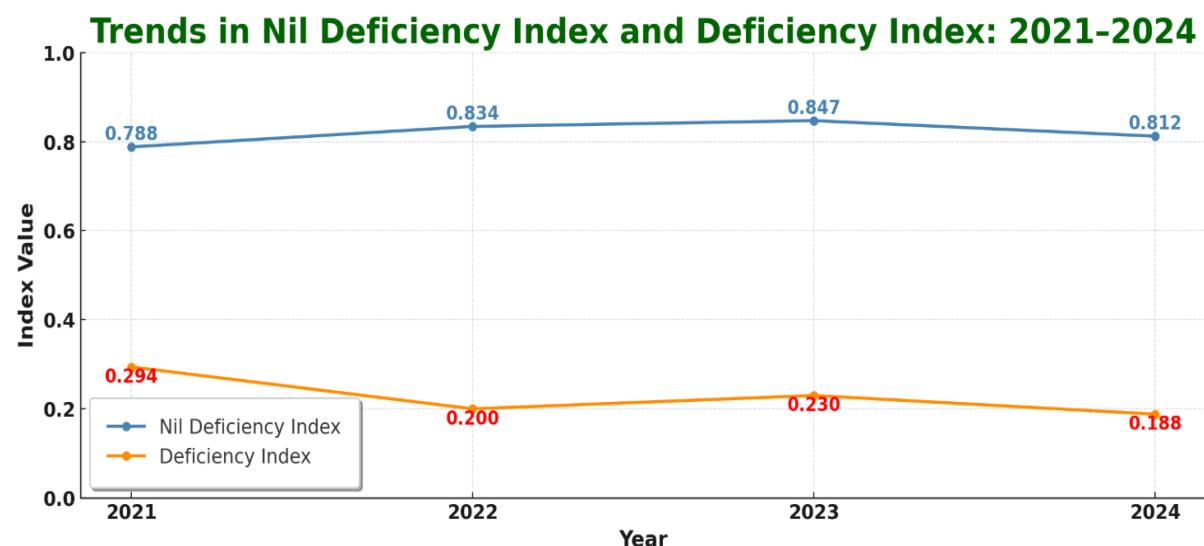


Figure 15. Trends in Nil Deficiency Index and Deficiency Index: 2021-2024

Table 31. Nature and Types of Deficiencies

MLC Regulation	Description	2022		2023		2024	
		Total Number	% of total deficiency	Total Number	% of total deficiency	Total Number	% of total deficiency
All Total	-	75	100%	92	100%	140	100%
1.2	Medical certificate	1	1.3%	1	1.1%	4	2.9%
1.3	Training and qualifications	0	0%	1	1.1%	0	0.0%
1.4	Recruitment and placement	2	2.7%	0	0%	1	0.7%
2.1	Seafarers' employment agreements	26	34.7%	27	29.3%	23	16.4%
2.2	Wages	13	17.3%	9	9.8%	12	8.6%
2.3	Hours of work and hours of rest	1	1.3%	1	1.1%	8	5.7%
2.4	Entitlement to leave	1	1.3%	0	0%	0	0.0%
3.1	Accommodation and recreational facilities	20	26.8%	27	29.3%	51	36.4%
3.2	Food and catering	6	8%	6	6.5%	12	8.6%
4.1	Medical care on board ship and ashore	3	4%	5	5.5%	10	7.1%
4.3	Health and safety protection and accident prevention	1	1.3%	11	12%	11	7.9%
5.1	Flag State responsibilities	0	0%	0	0%	3	2.1%
5.1.3	Maritime labour certificate and declaration of maritime labour compliance	0	0%	0	0%	5	3.6%
5.1.5	On-board complaint procedures	1	1.3%	4	4.3%	0	0.0%

Table 32. Age Based Inspection Results

Age Grouping	2022			2023			2024		
	Inspections	Deficiencies	Deficiencies per Inspection	Inspections	Deficiencies	Deficiencies per Inspection	Inspections	Deficiencies	Deficiencies per Inspection
1-5 Years	34	1	0.029	28	1	0.025	48	14	0.292
6-10 Years	52	6	0.115	40	7	0.175	27	14	0.519
11-15 Years	88	22	0.25	118	51	0.432	63	27	0.429
16-20 Years	91	22	0.241	101	22	0.217	124	55	0.444
20-25 Years	41	17	0.414	53	18	0.34	72	26	0.361
26 Years & above	68	20	0.294	60	10	0.1666	58	9	0.155

## Ship Type Analysis Average Deficiencies per total inspection

Table 33. Ship Type Based Deficiencies: 2024

Ship Type	Number of Inspections	Number of Inspections with deficiencies	Total Number of Deficiencies	Number of Inspections without deficiencies /Total number of inspections	Average Deficiencies per total inspection
Bulk Carrier	38	6	13	0.842	0.342
Gas Carriers	1	0	1	1	1
Oil Tanker	32	6	14	0.812	0.438
Chemical Tanker	4	1	2	0.75	0.5
Other Cargo Ships (AHTS, AHTS/Supply, AHTS/Tug, Offshore Support, Supply, Multi-Purpose Supply, Diving Support)	16	4	12	0.75	0.75
Other Cargo (Buoy, Floating Crane, Lighthouse Vessel, Patrol Boat, Pilot, survey Launch, Trailing suction Barge, Research Vessel, Oil Barge)	23	1	2	0.957	0.087
Other Cargo (Crew Boat, Utility Vessel, Work Boat)	13	1	2	0.923	0.1538
Other Cargo (Dredgers)	4	2	3	0.5	0.75
Other Cargo (Container)	22	2	2	0.909	0.091
Other Cargo (Cement Carrier)	14	2	3	0.857	0.214
Other Cargo (General Cargo)	22	2	2	0.909	0.091
Other Cargo (Tugs)	101	4	11	0.96	0.109
Other Cargo Ships (MODU, Accommodation Barges, Pipe Laying Barge, Well-Simulation Vessel)	4	1	2	0.75	0.5
Passenger Ships	4	3	3	0.25	0.75

Table 34. Ship Type Based Deficiencies: 2023

Ship Type	Number of Inspections	Number of Inspections with deficiencies	Total Number of Deficiencies	Number of Inspections without deficiencies /Total number of inspections	Average Deficiencies per total inspection
Bulk Carrier	58	7	9	0.879	0.155
Gas Carriers	12	1	1	0.917	0.0833
Oil Tanker	67	20	29	0.7014	0.4328
Chemical Tanker	9	0	0	1	0
Other Cargo Ships (AHTS, AHTS/Supply, AHTS/Tug, Offshore Support, Supply, Multi-Purpose Supply, Diving Support)	67	13	25	0.806	0.373
Other Cargo (Buoy, Floating Crane, Lighthouse Vessel, Patrol Boat, Pilot, survey Launch, Trailing suction Barge, Research Vessel, Oil Barge)	8	1	2	0.875	.25
Other Cargo (Crew Boat, Utility Vessel, Work Boat)	18	1	2	0.944	0.111
Other Cargo (Dredgers)	3	0	0	1	0
Other Cargo (Container)	17	3	6	0.823	0.353
Other Cargo (Cement Carrier)	11	0	0	1	0
Other Cargo (General Cargo)	28	13	4	0.892	0.142
Other Cargo (Tugs)	88	9	12	0.8977	0.136
Other Cargo Ships (MODU, Accommodation Barges, Pipe Laying Barge, Well-Simulation Vessel)	14	1	1	0.9285	0.0714

Table 35. Ship Type Based Deficiencies: 2022

Ship Type	Number of Inspections	Number of Inspections with deficiencies	Total Number of Deficiencies	Number of Inspections without deficiencies /Total number of inspections	Average Deficiencies per total inspection
Bulk Carrier	24	4	5	0.208	0.833
Gas Carriers	16	1	1	0.0625	0.9375
Oil Tanker	39	7	7	0.179	0.8205
Chemical Tanker	7	1	1	0.142	0.857
Other Cargo Ships (AHTS, AHTS/Supply, AHTS/Tug, Offshore Support, Supply, Multi-Purpose Supply, Diving Support)	74	21	30	0.405	0.716
Other Cargo (Buoy, Floating Crane, Lighthouse Vessel, Patrol Boat, Pilot, survey Launch, Trailing suction Barge, Research Vessel, Oil Barge)	10	0	0	0	1
Other Cargo (Crew Boat, Utility Vessel, Work Boat)	18	2	2	0.111	0.888
Other Cargo (Dredgers)	8	0	0	0	1
Other Cargo (Container)	10	2	2	0.2	0.8
Other Cargo (Cement Carrier)	10	4	4	0.4	0.6
Other Cargo (General Cargo)	55	10	10	0.18	0.818
Other Cargo (Tugs)	99	10	13	0.13	0.89
Other Cargo Ships (MODU, Accommodation Barges, Pipe Laying Barge, Well-Simulation Vessel)	4	0	0	0	1

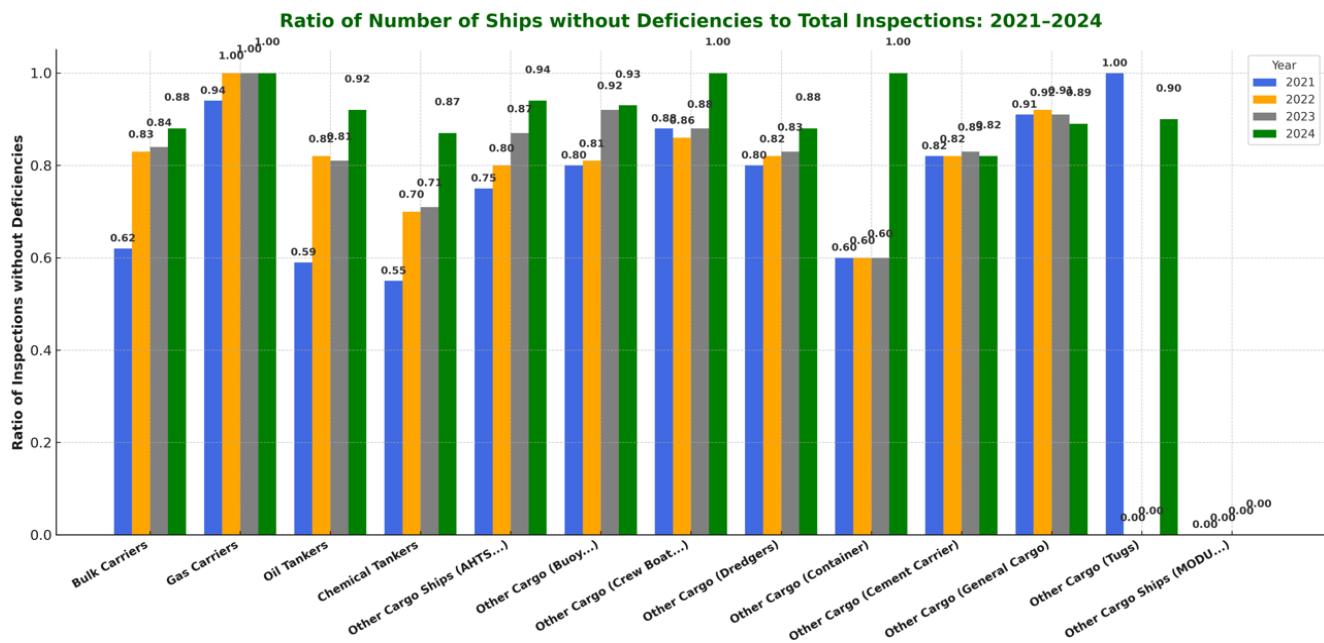


Figure 16. Ratio of No. of Ships without Deficiencies to Total Inspections: 2022-24

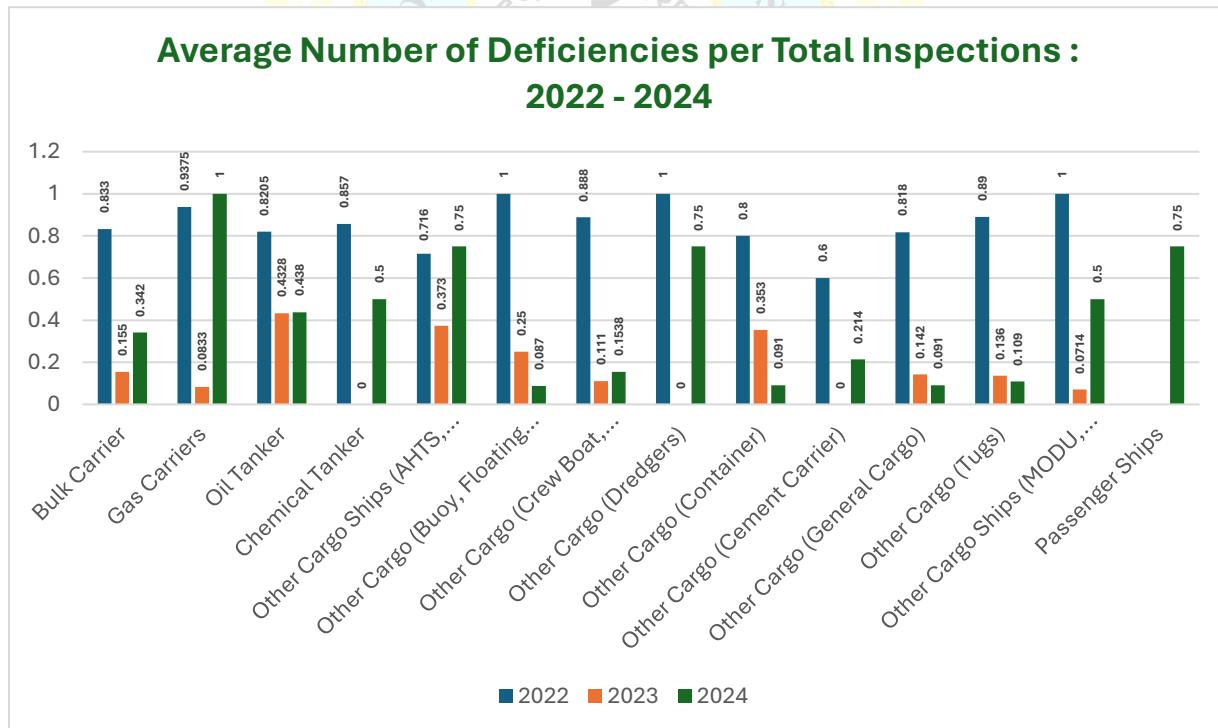


Figure 17. Average No. of Deficiencies per Total Inspections: 2022-24

## Trend Analysis: Bulk Carriers

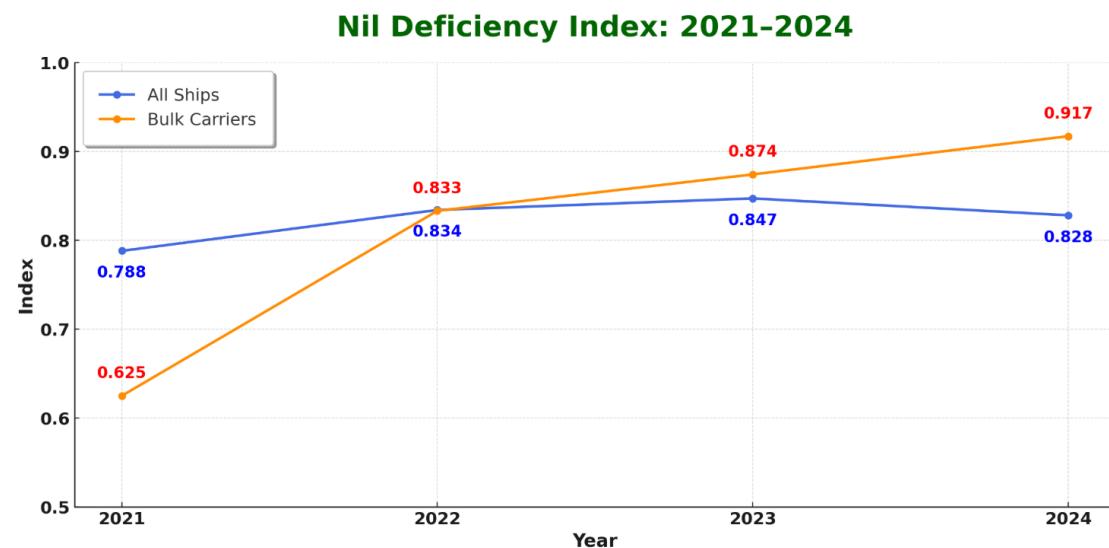


Figure 18. Nil Deficiency Index: 2021-2024- Bulk Carriers

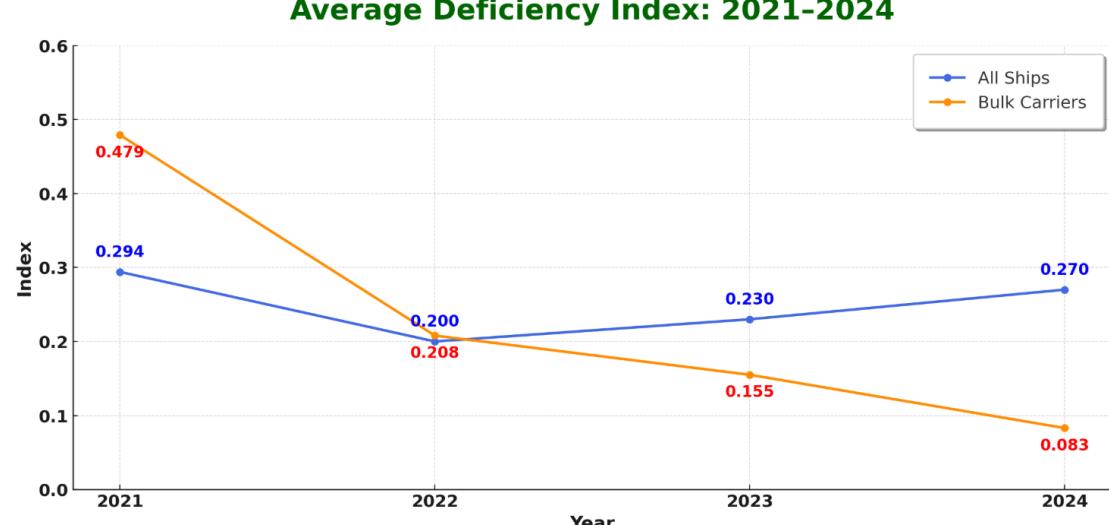


Figure 19. Average Deficiency Index: 2021-2024- Bulk Carriers

Table 36. Deficiencies as per MLC- Bulk Carriers

MLC Regulation n/ Article	Deficiency: 2024	Total Number
2.4	<b>Entitlement to leave:</b> The above requirement found not effectively implemented onboard as evidenced below: ETO found not signed off/repatriated upon completion of AOA (Signed on 05/05/2023 and engaged for 10 months). Request for Sign Off found submitted by Seafarer on 05/03/2024, acknowledged by Master on 06/03/2024 and forwarded to Company Fleet Personnel on 06/03/2024	1
2.7	Manning levels: Vessel not manned as per Safe Manning Document (MMD/MUMBAI/2019/012 dated 21/01/2019) - CO signed off on 29/02/2024 without any replacement.	1
3.1	<b>Accommodation and recreational facilities:</b> Accommodation not maintained in clean and habitable condition; weekly inspection records not available.	7
4.1	<b>Medical care on board ship and ashore:</b> Medical facilities not provided at all ports.	1
Deficiency: 2023		
2.1	<b>Seafarers' employment agreements:</b> Original SEA not signed by both Seafarer and Owner.	1
3.1	<b>Accommodation and recreational facilities:</b> Weekly inspections of accommodation not carried out.	4
3.2	Food and catering: Required quality of food not provided.	1
4.1	Medical care on board ship and ashore: Medicines not on board as required.	1
4.3	Health and safety protection and accident prevention: Proper procedures not in place to ensure occupational health and safety of seafarers.	2
Deficiency: 2022		
2.1	<b>Seafarers' employment agreements:</b> Original SEA not signed by both Seafarer and Owner.	2
2.2	Wages	1
3.1	<b>Accommodation and recreational facilities:</b> Accommodation not maintained in clean and habitable condition; weekly inspection records not available.	2

## Trend Analysis: Oil Tanker

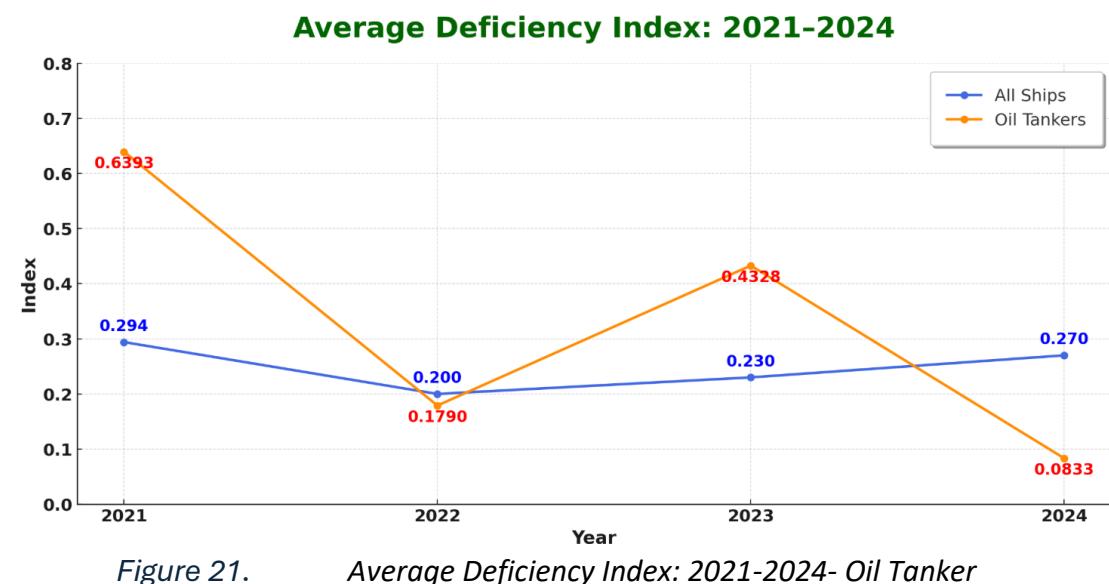
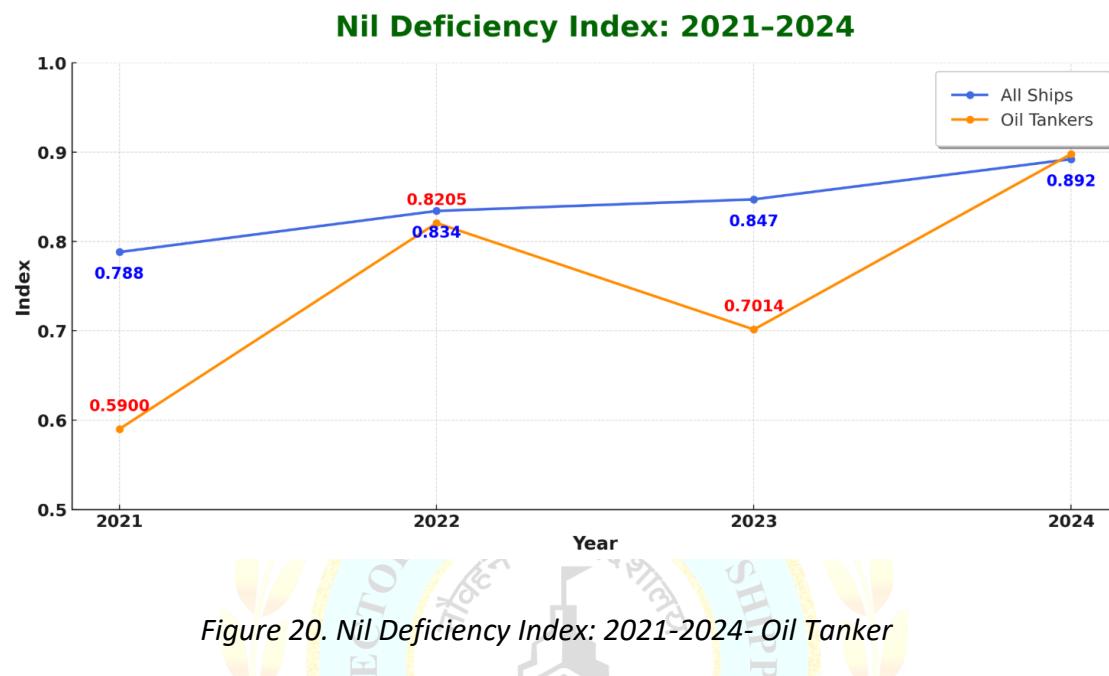


Table 37. Deficiencies as per MLC- Oil Tanker

MLC Regulation/ Article	Deficiency: 2024	Total Number
2.1	Seafarers' employment agreements: Availability of valid AOA; Signed SEA availability.	3
2.2	Wages: The wages detailed in SEA is less than that in CBA.	1
3.1	<b>Accommodation and recreational facilities:</b> Accommodation not maintained in clean and habitable condition; weekly inspection records not available.	4
3.2	Food and catering: 1. Test records of Drinking do not mention the standards being met. 2. Vessel is using RO Plants for Drinking water supply, maintenance schedule however not established/followed	1
Deficiency: 2023		
1.2	Medical Certificate: Seafarer sailing on ship with expired medical certificate with more than 90 days.	1
2.1	Seafarers' employment agreements: Availability of valid AOA; Signed SEA availability.	10
2.2	Wages: The wages detailed in SEA is less than that in CBA.	1
3.1	Accommodation and recreational facilities: Regular inspection of accommodation not carried out.	9
3.2	Food and catering: Required quality and food and water not available.	4
4.1	Medical care on board ship and ashore: The medical chest is not complete with required equipment and medicines.	2
4.3	Health and safety protection and accident prevention: The occupational health and safety procedures does not ensure safety of seafarers.	2
2.2	Wages	1
3.1	Accommodation and recreational facilities: Regular inspection of accommodation not carried out.	2
Deficiency: 2022		
2.1	Seafarers' employment agreements: Conditions of the employment not spelt out in SEA; Minimum annual leave pay not spelt out in SEA; Death and disability compensation in SEA not as per MSN 07 of 2020.	4
2.2	Wages: Paid wages not as per Rules.	1
2.3	Hours of work and hours of rest: Rest not as per Flag requirements.	1
4.1	Medical care on board ship and ashore: Record of medical treatment on board not maintained.	1

## Trend Analysis: Chemical Tankers

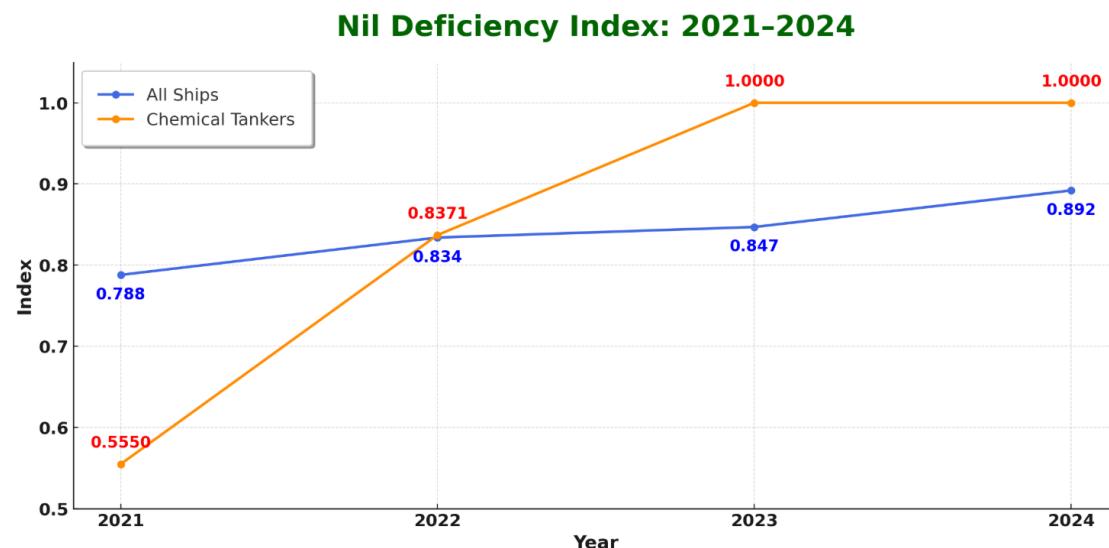


Figure 22. Nil Deficiency Index: 2021-2024- Chemical Tankers

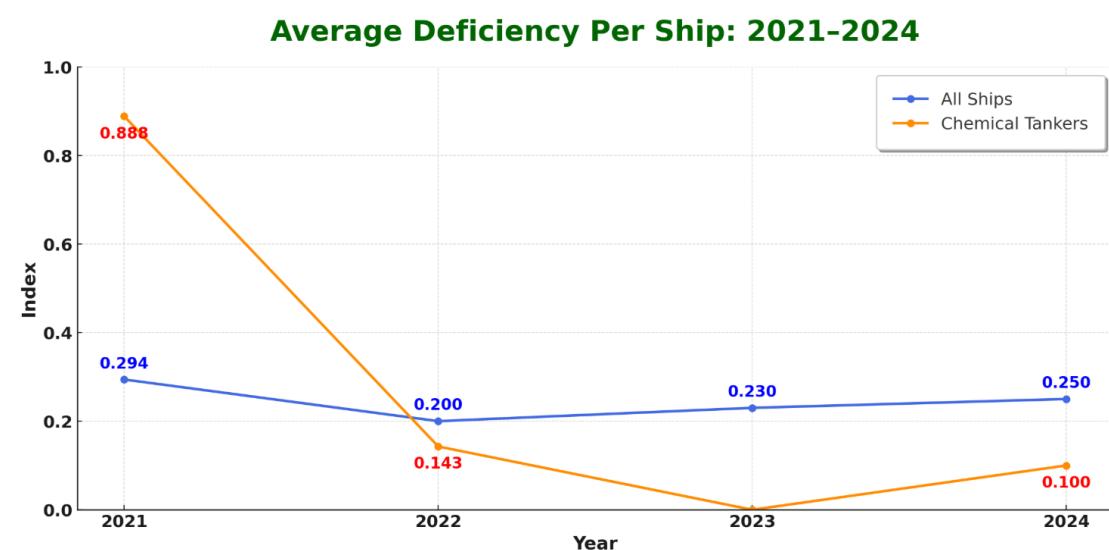
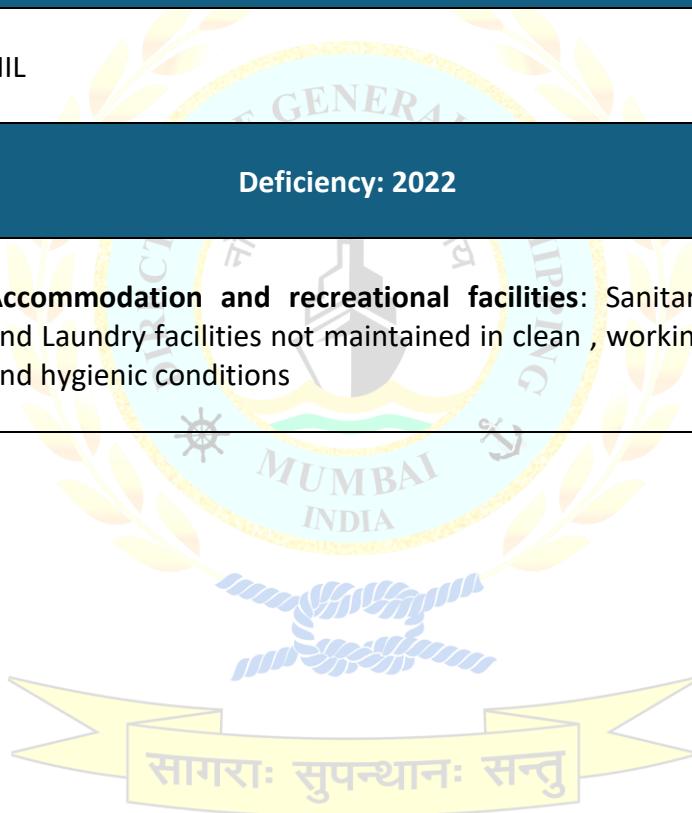


Figure 23. Average Deficiency Index: 2021-2024- Chemical Tankers

Table 38. Deficiencies as per MLC- Chemical Tankers

MLC Regulation/Article	Deficiency: 2024	Total Number
2.1	Seafarers' employment agreements: The terms and conditions of AOA are not in accordance with CBA.	1
	<b>Deficiency: 2023</b>	
	NIL	
	<b>Deficiency: 2022</b>	
3.1	<b>Accommodation and recreational facilities:</b> Sanitary and Laundry facilities not maintained in clean , working and hygienic conditions	1



## Trend Analysis: Other Cargo Ships (AHTS, AHTS/Supply, AHTS/Tug, Offshore Support, Supply, Multi-Purpose Supply, Diving Support

### Nil Deficiency Index: Other Cargo Ships (AHTS, Offshore Supply etc.): 2021-2024

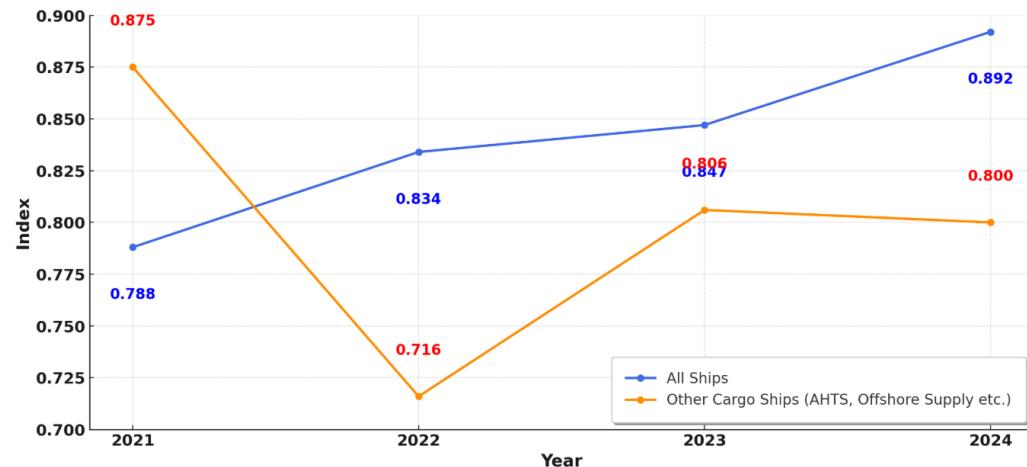


Figure 24. Nil Deficiency Index: 2021-2024- Other Cargo Ships (AHTS, Offshore Supply, etc)

Table 39. Deficiencies as per MLC- Other Cargo Ships (AHTS, Offshore Supply, etc)

MLC Regulation/Article	Deficiency: 2024	Total Number
2.1	<b>Seafarers' employment agreements:</b> CBA not available on-board ship; SEA does not meet CBA requirements.	2
2.2	<b>Wages:</b> Overdue salary payment of seafarer on board ships	2
2.3	Hours of work and hours of rest: Rest hours do not meet Rule requirements.	3
3.1	<b>Accommodation and recreational facilities:</b> Design of accommodation does not facilitate easy cleaning, accommodation not regularly inspected, Non-functioning air conditioner, and accommodation not in decent habitable and repaired condition.	9
3.2	Food and catering: Food and drinking water of appropriate quality, nutritional value and quantity served are not of adequate quality.	1
5.1.5	On-board complaint procedures: Non-availability of procedures.	1
4.1	<b>Medical care on board ship and ashore:</b> Hospital facilities does not meet flag state requirements regarding medicines and medical supplies	1

4.3	<b>Health and safety protection and accident prevention:</b> The occupational health and safety procedures does not ensure safety of seafarers.	1
<b>Deficiency: 2023</b>		
2.1	Seafarers' employment agreements: SEA does not clearly specify all elements of seafarer salary, Seafarer not serving at Articles wages, signing of agreement by seafarer and owner representative.	5
2.2	Wages: Non-Payment of Seafarer salary at monthly intervals.	5
2.3	Hours of work and hours of rest: Non-compliance with work and rest hours.	1
3.1	<b>Accommodation and recreational facilities:</b> No recreational facilities, accommodation design not meeting Flag requirements, accommodation not maintained in proper conditions.	10
3.2	<b>Food and catering:</b> Master inspection frequency	1
4.1	<b>Medical Care on Board:</b> Medical chest not complete with all required medicines.	1
4.3	<b>Health and safety protection and accident prevention:</b> The occupational health and safety procedures does not ensure safety of seafarers.	1
5.1.5	<b>On Board Complaint:</b> Non availability of on board complaint procedures.	1
<b>Deficiency: 2022</b>		
1.2	Medical Certificate: Not signed by approved Medical Doctor.	1
1.4	Recruitment and Placement Agencies: The Ship Owner does not have an agreement with RPSL supplying seafarer to ship.	1
2.1	Seafarers' employment agreements: Valid SEA not available; annual paid leave not detailed in SEA	7
2.2	Wages: Seafarers not paid as per Agreement between Seafarer Organizations, Competent Authority and Ship Owner Association; Salary not paid at monthly intervals.	5
3.1	<b>Accommodation and recreational facilities:</b> Design of accommodation does not facilitate easy cleaning, accommodation not regularly inspected, Non-functioning air conditioner, and accommodation not in decent habitable and repaired condition.	10
3.2	<b>Food and catering:</b> Storage space for food not available; quality of food not as required; unhygienic food;	5
4.1	<b>Medical care on board ship and ashore:</b> Hospital facilities does not meet flag state requirements regarding medicines and medical supplies	1

## Trend Analysis: Gas Carriers

### Nil Deficiency Index: 2021-2024

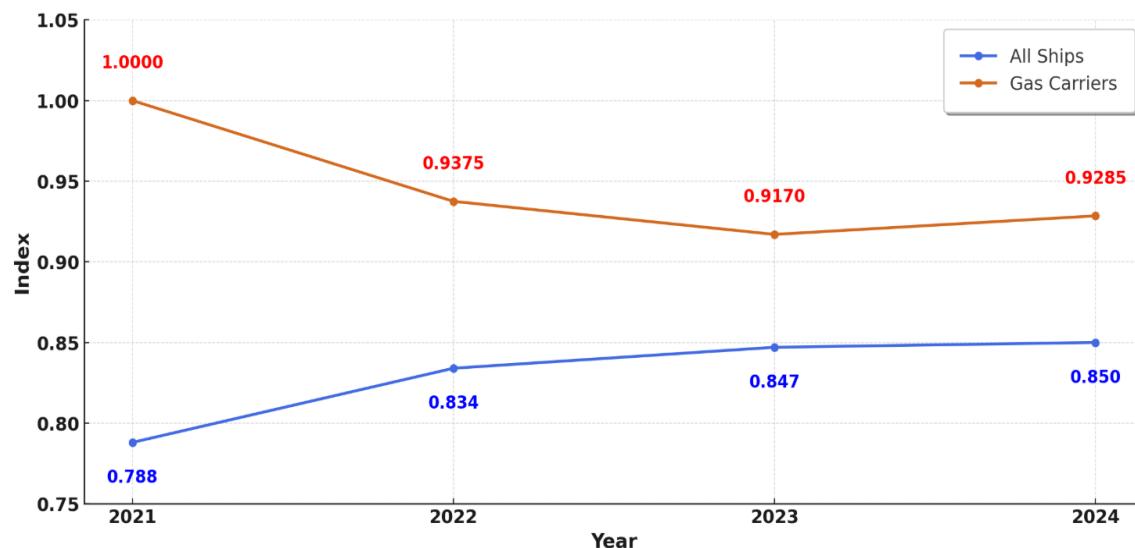


Figure 25. Nil Deficiency Index: 2021-2024- Gas Carriers

### Average Deficiencies per Ship Inspected: 2021-2024

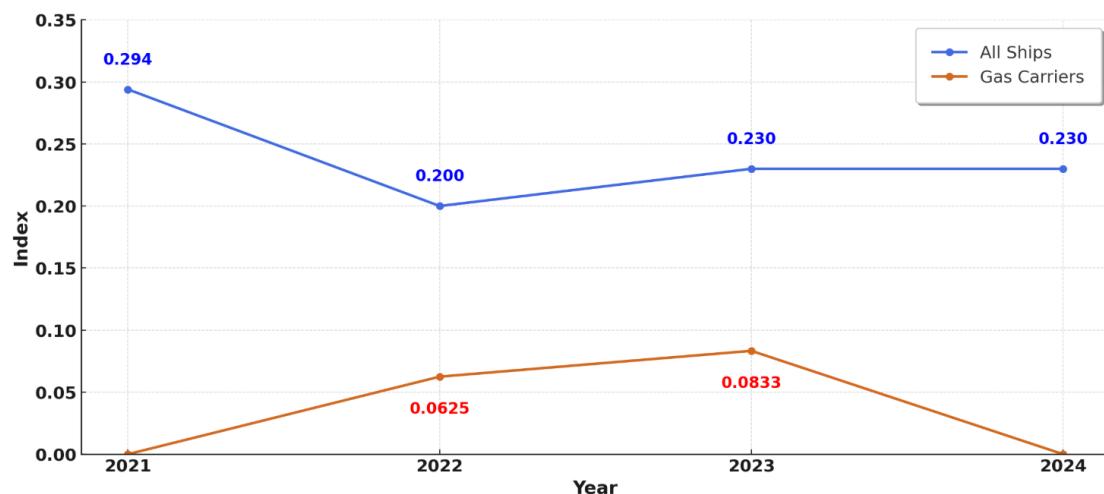


Figure 26. Average Deficiency Index: 2021-2024- Gas Carriers

Table 40. Deficiencies as per MLC- Gas Carriers

MLC Regulation/Article	Deficiency: 2024	Total Number
	Nil deficiencies	0
	<b>Deficiency: 2023</b>	
4.1	Medical care on board ship and ashore: Medicines not on board as required.	1
	<b>Deficiency: 2022</b>	
5.1.5	On-board complaint procedures: Not available on board ship.	1



## Trend Analysis: Other Cargo (Buoy, Floating Crane, Lighthouse Vessel, Patrol Boat, Pilot, survey Launch, Trailing suction Barge, Research Vessel, Oil Barge)

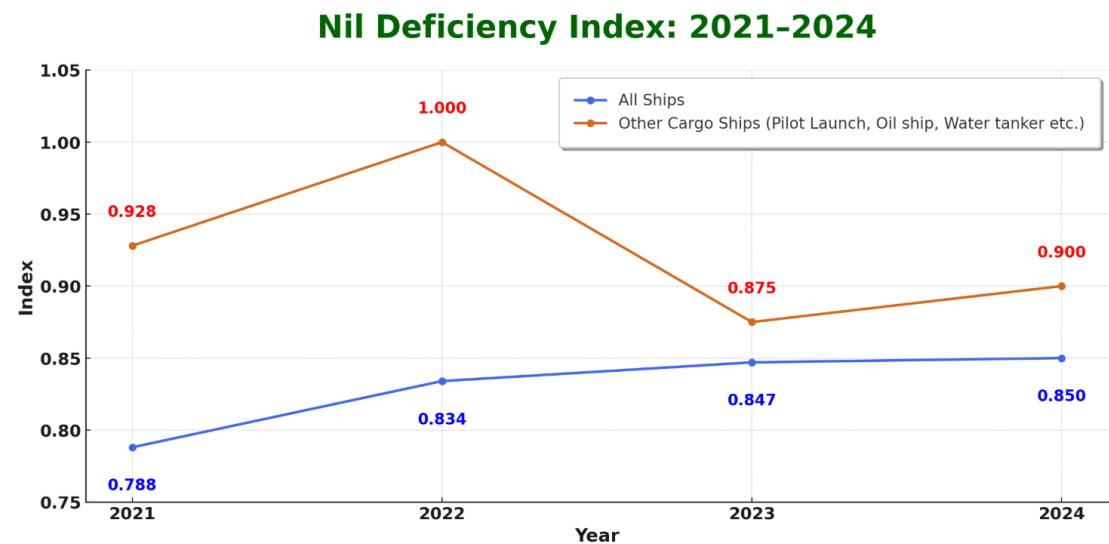


Figure 27. Nil Deficiency Index: 2021-2024- Other Cargo Ships (Buoys, Floating Cranes etc)



*Table 41. Deficiencies as per MLC- Other Cargo Ships (Buoys, Floating Cranes etc)*

MLC Regulation/Article	Deficiency: 2024	Total Number
2.1	Seafarers' employment agreements: Valid SEA not available; annual paid leave not detailed in SEA	1
3.1	<b>Accommodation and recreational facilities:</b> Design of accommodation does not facilitate easy cleaning, accommodation not regularly inspected, Non-functioning air conditioner, and accommodation not in decent habitable and repaired condition.	1
4.1	<b>Medical care on board ship and ashore:</b> Hospital facilities does not meet flag state requirements regarding medicines and medical supplies	1
Deficiency: 2023		
2.1	<b>Seafarers' employment agreements:</b> SEA does not clearly specify all elements of seafarer salary	1
5.1.5	<b>On-board complaint procedures:</b> Procedures not available with seafarers serving on board.	1
Deficiency: 2022		
	Nil Deficiencies	

## Trend Analysis: Other Cargo (Crew Boat, Utility Vessel, Work Boat)

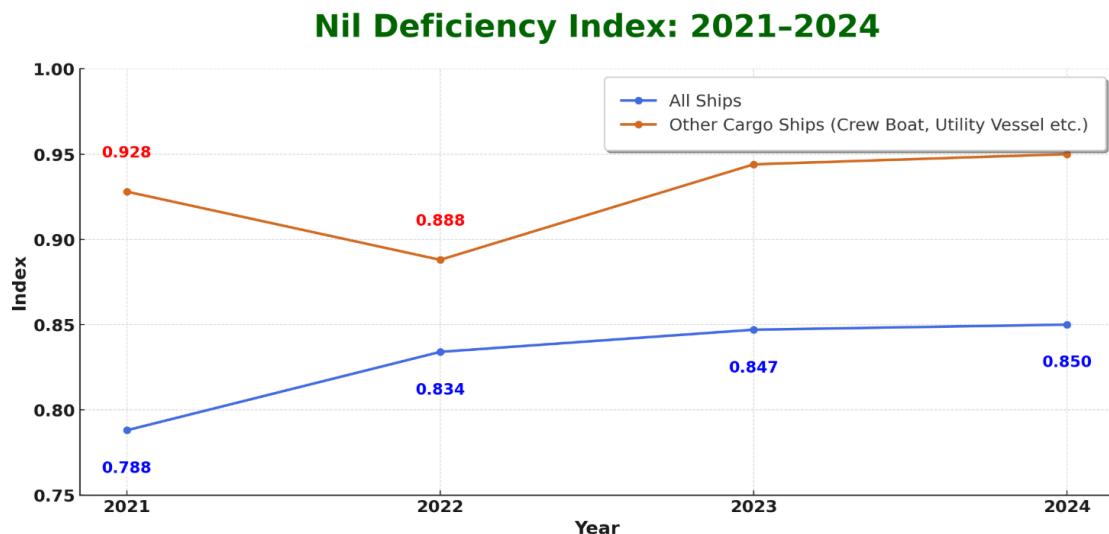


Figure 28. Nil Deficiency Index: 2021-2024- Other Cargo (Crew Boat, Utility Vessel, Work Boat)

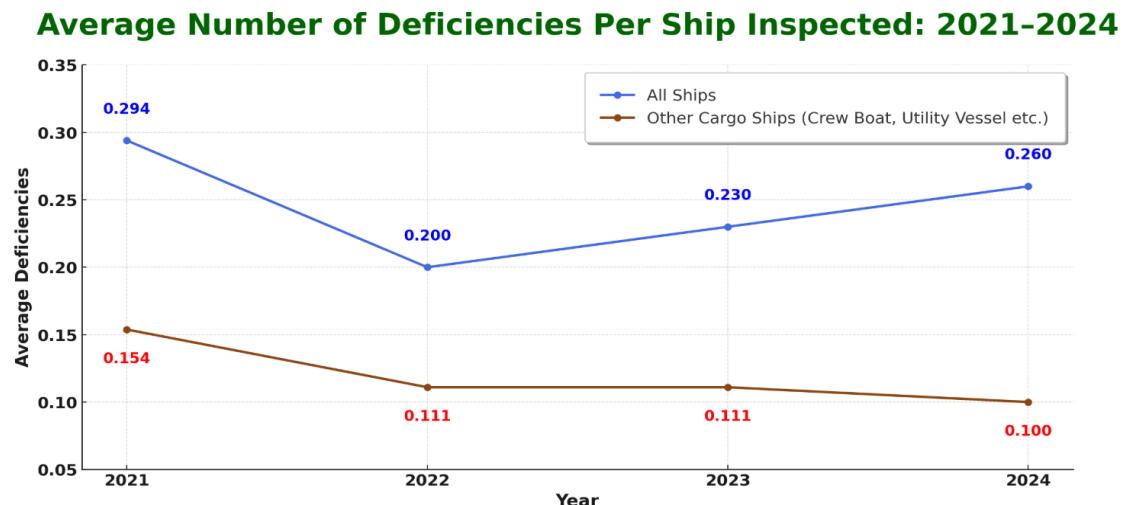


Figure 29. Average Deficiency Index: 2021-2024- Other Cargo (Crew Boat, Utility Vessel, Work Boat)

*Table 42. Deficiencies as per MLC- Other Cargo (Crew Boat, Utility Vessel, Work Boat)*

MLC Regulation/ Article	Deficiency: 2024	Total Number
2.3	Hours of work and hours of rest: Working hours are exceeding the Rule requirements.	1
5.1.3	<b>Maritime labour certificate and declaration of maritime labour compliance:</b> Copy of DMLC Part 2 not submitted to Registrar as per MS Notice 1 of 2019.	1
Deficiency: 2022		
2.2	<b>Wages:</b> Monthly account of wages not given to seafarer; Seafarers not paid on monthly basis.	2
Deficiency: 2023		
1.3	Training and qualifications: Ship not manned as per MSMD.	1
2.1	Seafarers' employment agreements: These does not meet MS Rules.	1
3.1	Accommodation and recreational facilities: Accommodation not maintained in decent condition.	1

## Trends: Other Cargo (Dredgers)

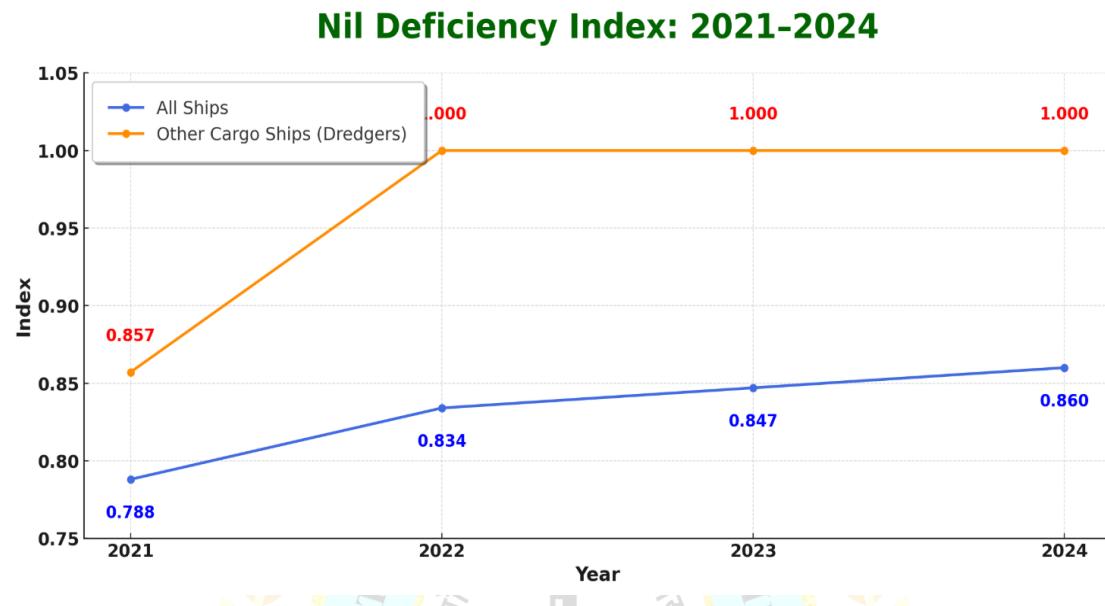


Figure 30. Nil Deficiency Index: 2021-2024- Other Cargo (Dredgers)

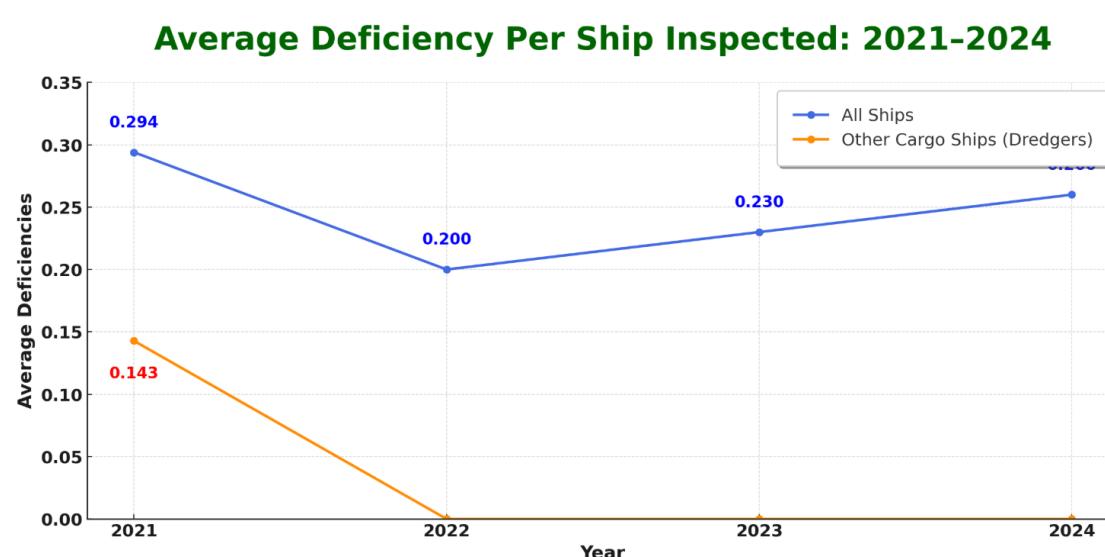


Figure 31. Average Deficiency Index: 2021-2024- Other Cargo (Dredgers)

Table 43. Deficiencies as per MLC- Other Cargo (Dredgers)

MLC Regulation/ Article	Deficiency: 2024	Total Number
3.1	<b>Accommodation and recreational facilities:</b> Design of accommodation does not facilitate easy cleaning, accommodation not regularly inspected, Non-functioning air conditioner, and accommodation not in decent habitable and repaired condition.	1
	<b>Deficiency: 2022</b>	
	Nil deficiencies.	
	<b>Deficiency: 2023</b>	
	Nil deficiencies	



## Trends: Other Cargo (Container)

### Nil Deficiency Index: 2021-2024

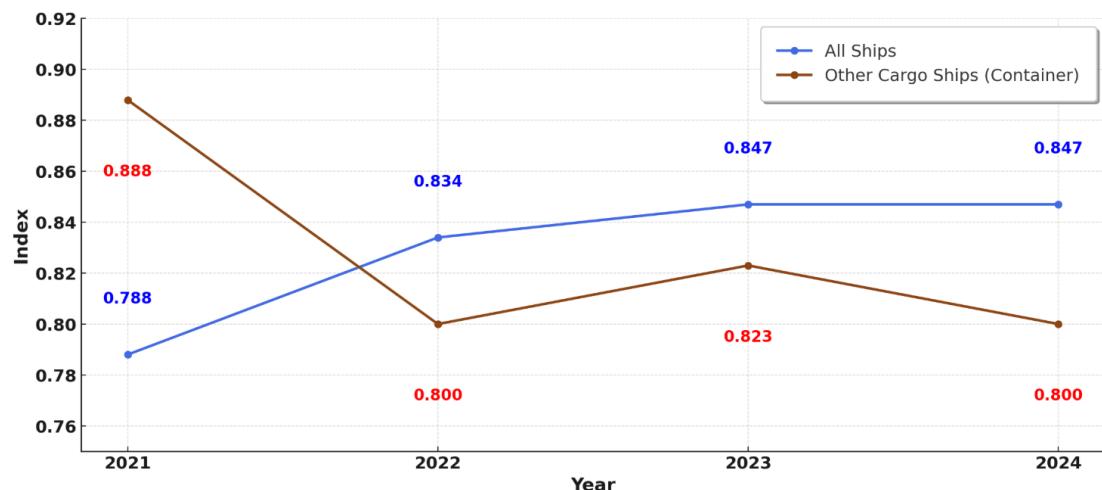


Figure 32. Nil Deficiency Index: 2021-2024- Other Cargo (Containers)

### Nil Deficiency Index: 2021-2024

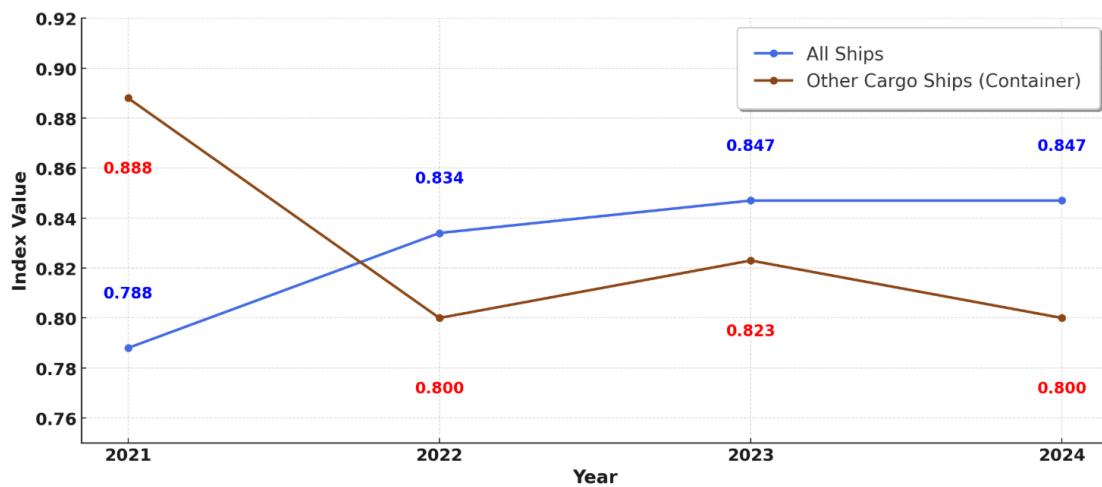


Figure 33. Average Deficiency Index: 2021-2024- Other Cargo (Containers)

Table 44. Deficiencies as per MLC- Other Cargo (Containers)

MLC Regulation/ Article	Deficiency: 2024	Total Number
3.1	<b>Accommodation and recreational facilities:</b> Design of accommodation does not facilitate easy cleaning, accommodation not regularly inspected, Non-functioning air conditioner, and accommodation not in decent habitable and repaired condition.	1
4.3	<b>Health and safety protection and accident prevention:</b> The occupational health and safety procedures does not ensure safety of seafarers	1
Deficiency: 2023		
2.1	<b>Seafarers' employment agreements:</b> Conditions of employment are specified in clear terms in SEA.	1
4.3	<b>Health and safety protection and accident prevention:</b> The occupational health and safety procedures does not ensure safety of seafarers	2
5.1.5	<b>On-board complaint procedures:</b> Procedures not available with seafarers serving on board	1
Deficiency: 2023		
2.1	<b>Seafarers' employment agreements:</b> Conditions of employment are specified in clear terms in SEA.	1
2.2	<b>Wages:</b> Wages not in accordance with CBA.	1

## Trends: Other Cargo (Cement Carriers)

### Nil Deficiency Index: 2021-2024

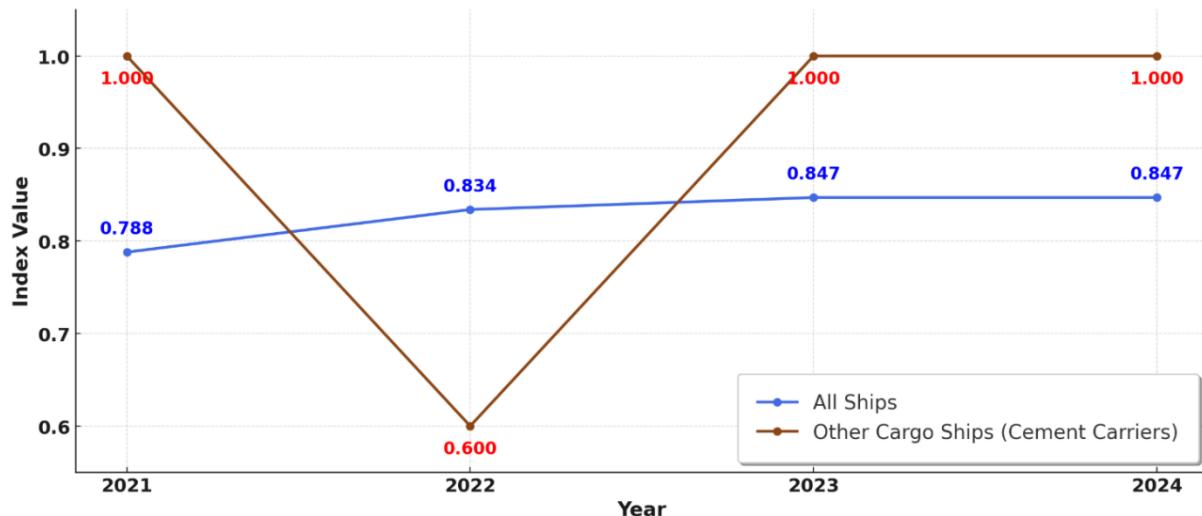


Figure 34. Nil Deficiency Index: 2021-2024- Other Cargo (Cement Carriers)

### Average Deficiency Per Ship Inspected: 2021-2024

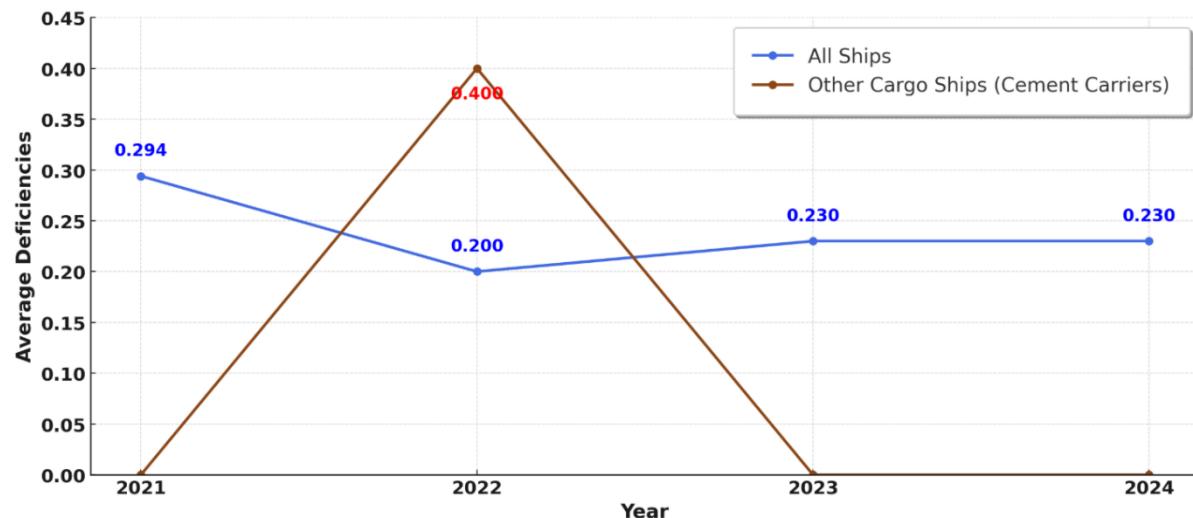


Figure 35. Average Deficiency Index: 2021-2024- Other Cargo (Cement Carriers)

Table 45. Deficiencies as per MLC- Other Cargo (Cement Carriers)

MLC Regulation/Article	Deficiency: 2024	Total Number
2.1	<b>Seafarers' employment agreements:</b> Article of agreement of Chief cook found expired and no extension record found available onboard	3
<b>Deficiency: 2023</b>		
	Nil deficiency	
<b>Deficiency: 2022</b>		
2.1	<b>Seafarers' employment agreements:</b> Seafarers does not understand the terms and conditions detailed in SEA.	4

## Trends: Other Cargo (General Cargo)

### Average Number of Deficiencies Per Ship Inspected: 2021-2024

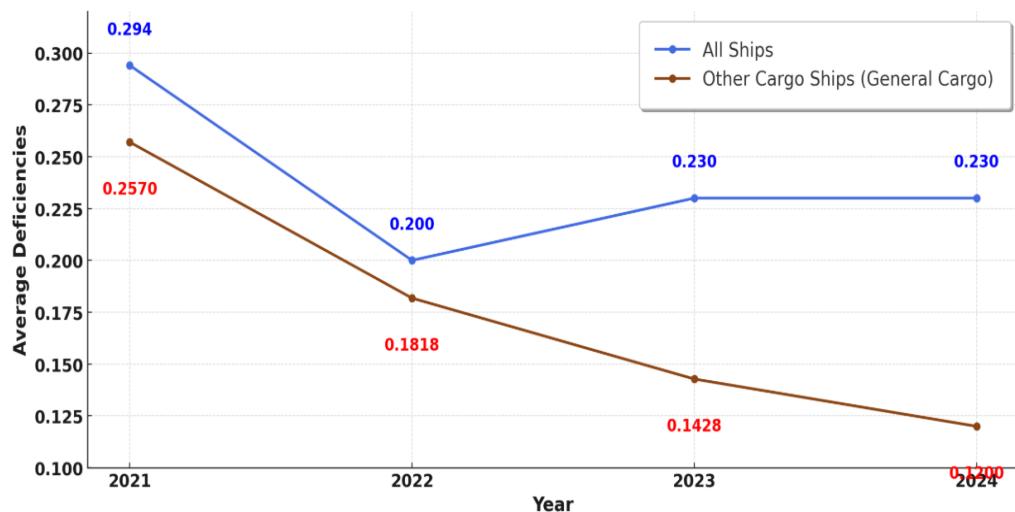


Figure 36. Average Deficiency Index: 2021-2024- Other Cargo (General Cargo)



Table 46. Deficiencies as per MLC- Other Cargo (General Cargo)

MLC Regulation/ Article	Deficiency: 2024	Total Number
2.1	<b>Hours of work and hours of rest:</b> Records not maintained in standardized form.	1
3.1	<b>Accommodation and recreational facilities:</b> Non-Operational Air Conditioner; Accommodation Plan not approved; Laundry facilities not available.	7
Deficiency: 2023		
2.1	<b>Seafarers' employment agreements:</b> The terms and conditions for employment of a seafarer are not in a clear written legally enforceable agreement or consistent with the standards set out in the MLC; Copy of CBA not-available.	2
3.1	Accommodation and recreational facilities: Weekly inspections not conducted.	1
4.3	<b>Health and safety protection and accident prevention:</b> The occupational health and safety procedures does not ensure safety of seafarers	1
Deficiency: 2022		
2.1	<b>Seafarers' employment agreements:</b> The terms and conditions for employment of a seafarer are not in a clear written legally enforceable agreement or consistent with the standards set out in the MLC; Not signed by both Owner and Seafarer.	4
3.1	<b>Accommodation and recreational facilities:</b> Non-Operational Air Conditioner; Accommodation Plan not approved; Laundry facilities not available	6

## Trends: Other Cargo (Tugs)

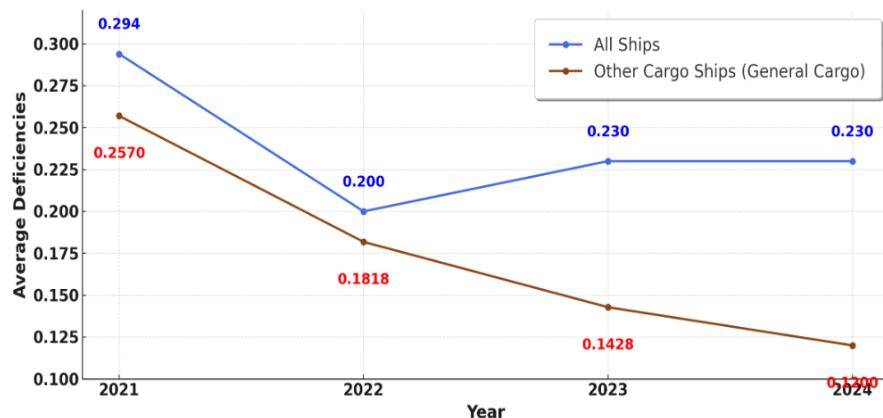


Figure 37. Average Deficiency Index: 2021-2024- Other Cargo (Tugs)

Table 47. Deficiencies as per MLC- Other Cargo (Tugs)

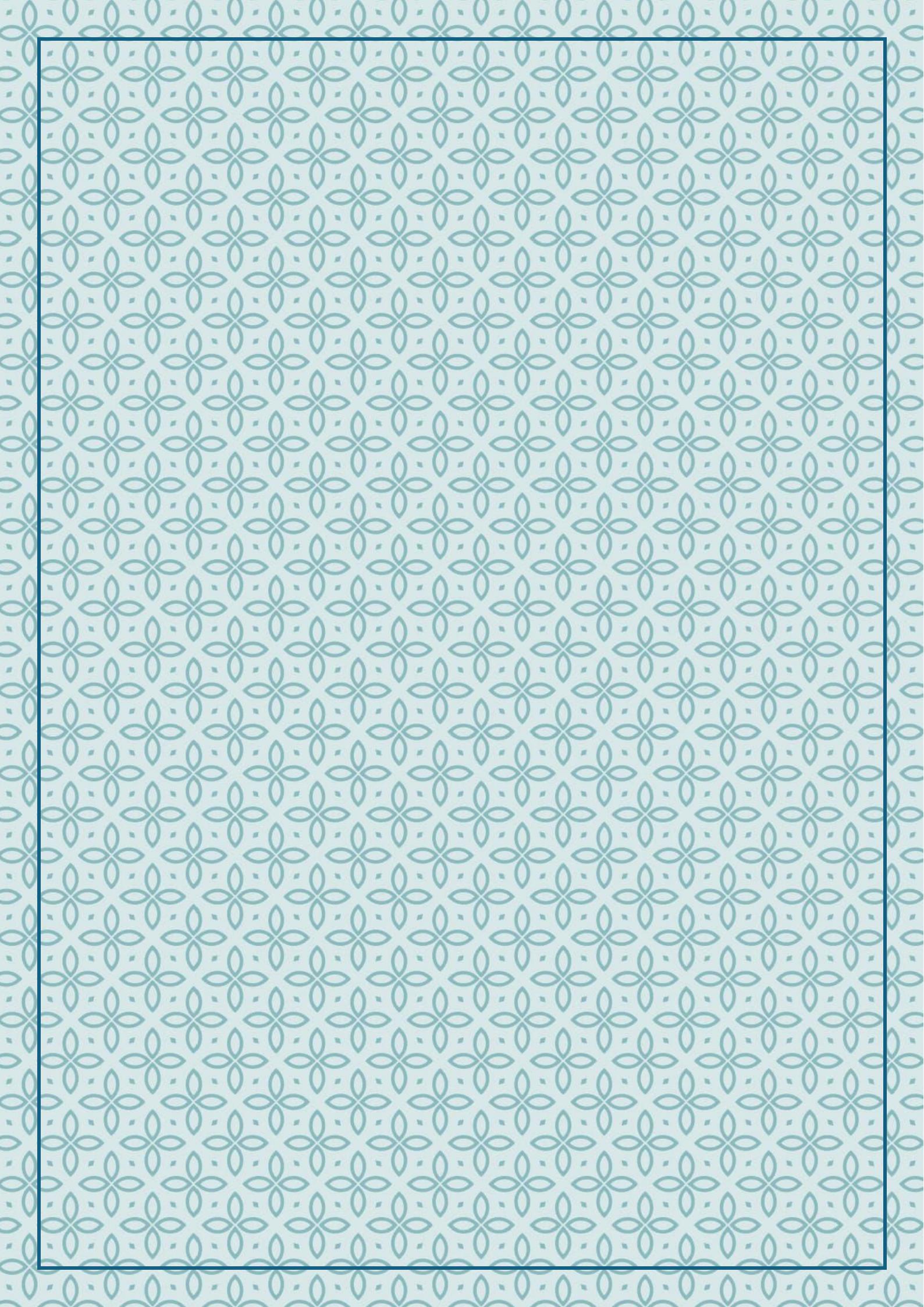
MLC Regulation/ Article	Deficiency: 2024	Total Number
2.1	<b>Seafarers' employment agreements:</b> No power given to RPSL to sign RPSL on behalf of Owners.	2
2.2	<b>Wages:</b> Wages not paid at monthly intervals.	2
2.3	Hours of work and hours of rest: Working hours are exceeding the Rule requirements.	2
3.1	<b>Accommodation and recreational facilities:</b> Choked drainage system; accommodation plan not approved.	10
3.2	<b>Food and catering:</b> Food supplied to seafarer is not of required quality, nutritional value.	1
4.1	<b>Medical care on board ship and ashore:</b> Stock of medicines and equipment not available.	1
5.1.3	<b>Original DMLC Part I</b> issued by Flag administration dated not sighted onboard.	1
Deficiency: 2023		
1.4	<b>Recruitment and placement:</b> The AOA not filed with Shipping Master.	1
2.1	<b>Seafarers' employment agreements:</b> Terms and Conditions of employment are not clearly set out in SEA; SEA not signed by both ship owner or its representative and seafarer.	4
2.2	<b>Wages:</b> Payment of wages not at monthly intervals.	3
2.4	<b>Entitlement to leave:</b> Paid leave provisions not detailed in SEA.	1
3.1	<b>Accommodation and recreational facilities:</b> Weekly inspection of accommodation not carried out.	1

3.2	<b>Food and catering:</b> Food supplied to seafarer is not of required quality, nutritional value.	1
4.1	<b>Medical care on board ship and ashore:</b> Stock of medicines and equipment not available.	1
4.3	<b>Health and safety protection and accident prevention:</b> No procedures in place of "Permit to work" system when undertaking hazardous tasks on board.	1
<b>Deficiency: 2022</b>		
2.1	Seafarers' employment agreements: SEA not signed by both seafarer and ship owner; terms and Conditions of employment are not clearly set out in SEA; SEA not signed by both ship owner or its representative and seafarer.	4
2.2	Wages: All elements of salary not reflected in account of wages; wages not paid at monthly intervals.	3
3.1	Accommodation and recreational facilities: Not maintained accommodation.	1
4.3	<b>Health and safety protection and accident prevention:</b> The occupational health and safety procedures does not ensure safety of seafarers	3
5.1.5	Maritime labour certificate and declaration of maritime labour compliance: All requirements detailed in DMLC Part II not implemented.	1

## Trends: Other Cargo Ships (MODU, Accommodation Barges, Pipe Laying Barge, Well-Simulation Vessel)

Table 48. Deficiencies as per MLC- Other Cargo (Other Cargo Ships (MODU, Accommodation Barges, Pipe Laying Barge, Well-Simulation Vessel)

MLC Regulation/Article	Deficiency: 2024	Total Number
Nil Inspections		
<b>Deficiency: 2023</b>		
Nil Deficiencies		
<b>Deficiency: 2022</b>		
3.1	Accommodation and recreational facilities	1



# Chapter IV: Performance of Indian Ships

Based on Survey, Certification, Casualty, Flag and Port State Inspections  
and Agencies Involved in Survey and Certification of Ships

## Assessment of Condition of Class issued during completion of Surveys

'Recommendation' and 'Condition of Class' are different terms used by IACS Societies for the similar thing, i.e. requirements to the effect that specific measures, repairs, surveys etc. are to be carried out within a specific time limit in order to retain class. A Condition of Class issued during periodical surveys is an indication of one or more of the following:

- i. Poor maintenance of ship between surveys.
- ii. Ship operational with defects.
- iii. A maintenance regime on ship which is unable to detect deficiencies.
- iv. Non-compliance to Regulation 11 (*Maintenance of conditions after survey part B, Chapter I of SOLAS which require that whenever an accident occurs to a ship or a defect is discovered, either of which affects the safety of the ship or the efficiency or completeness of its life-saving appliances or other equipment, the master or owner of the ship shall report at the earliest opportunity to the Administration, the nominated surveyor or recognized organization responsible for issuing the relevant certificate.*

## Surveys conducted by Classification Societies

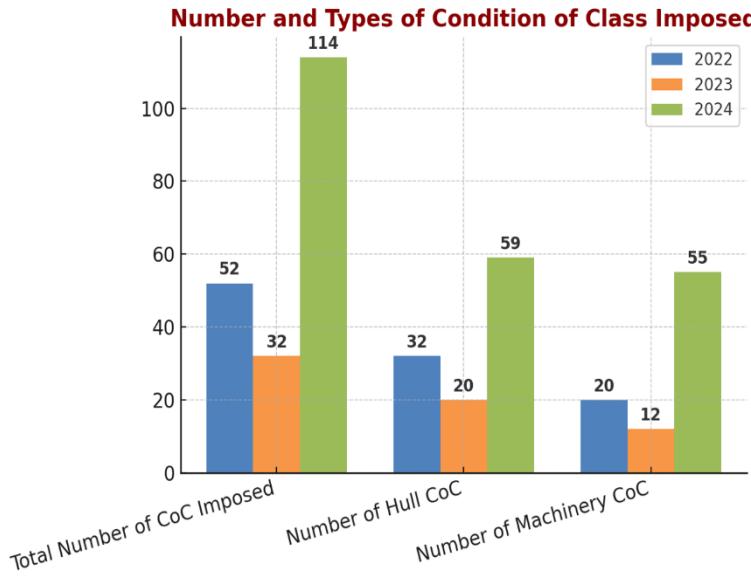
A review of statistics shows that about 70-95% of all Statutory Surveys of Indian ships is conducted by IRS and this figure is about 96% for ships less than 5000 GT, 75% for ships between 5000 GT to 50,000 GT and 65% for all ships above 50,000 GT. Thus, CoC statistics is gathered from IRS and analyzed and it does not mean that this is an analysis of IRS performance.

Table 49. *Statutory Surveys and Performance of ROs in FSI*

Vessel less than 5000 GT: No of ships					Vessel between 5000 GT and 50,000 GT: No of ships surveyed							Vessel more than 50,000 GT: No of ships surveyed			
2020	2021	2022	2023	2024	2020	2021	2022	2023	2023	2024	2020	2021	2022	2023	
6	6	6	4	1	4	4	4	4	6	6	6	7	7	7	0
5	1	1	1	0	0	0	0	2	2	3	0	0	0	0	0
3	2	0	0	0	4	8	4	4	10	4	0	0	0	0	0
636	585	580	384	367	212	248	97	103	44	44	0	0	0	0	0
0	0	0	0	0	0	8	8	4	7	7	0	0	0	0	0
0	0	0	0	0	0	12	20	43	20	20	0	0	0	0	0
659	640	597	420	408	228	312	184	222	222	228	65	11	0	0	0
96.50 %	91.40 %	97.20 %	91.40 %	90.00 %	78.50 %	11.80 %	74.50 %	31.10 %	45.00 %	15.00 %	67.70 %	63.30 %	0.00 %	0.00 %	0.00 %
14	27	24	33	0	2	2	2	2	2	3	0.00%	0.00 %	0.00 %	0.00 %	0

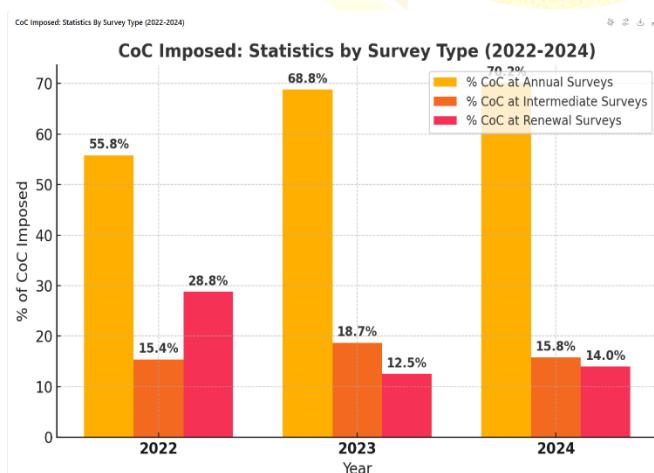
82.40	93.10	92.30	91.70	0.00	11.80	6.90	7.70	1.10	8.90	7.70	100.00	5.90	0.00	0
%	%	%	%	%	%	%	%	%	%	%	%	%	%	0
82.40	93.10	92.30	91.60	0.00	11.80	6.90	7.70	8.80	7.40	8.30	0.00%	5.90	0.00	0

## Review of Statistics of the Condition of Class imposed in last 2 years by IRS

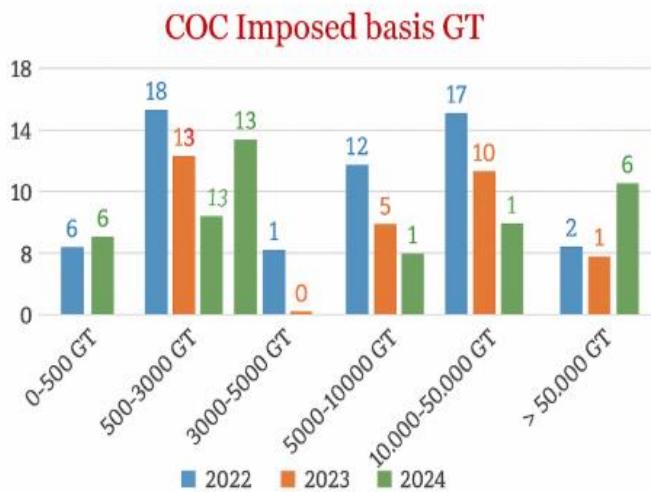


2024 reversed the trend dramatically with **record-high CoC counts** in all categories.

Machinery CoCs increased more sharply (in % terms) than Hull CoCs, but Hull CoCs remain slightly higher in absolute numbers.



Almost 70% of all CoCs are imposed during Annual Surveys indicating poor maintenance regime on ships and almost 20% imposed during intermediate and renewal surveys. Renewal & Intermediate surveys being major surveys involving docking indicates poor preparation for these surveys by shipping companies.



2024 sees a shift of COC Imposed cases toward mid-range GT categories (0–500, 3000–5000, >50,000) rather than large mid-high ranges like 10,000–50,000 GT.

The spike in **3000–5000 GT** in 2024 suggests a new operational or compliance challenge in this segment.



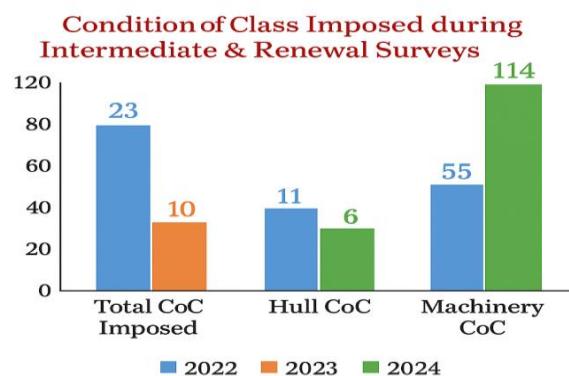
Oil tanker, Container, Dredger, General cargo ship vessel types collectively account for roughly **60–70%** of all Conditions of Class in 2024, indicating that operational issues are heavily concentrated here. From 2023 to 2024, the total number of cases jumped sharply ( $30 \rightarrow 114$ ), more than tripling. Large increases occurred for **Oil Tanker, Dredger**

Figure 38. Review of Statistics of Condition of Class imposed in last 2 years by IRS

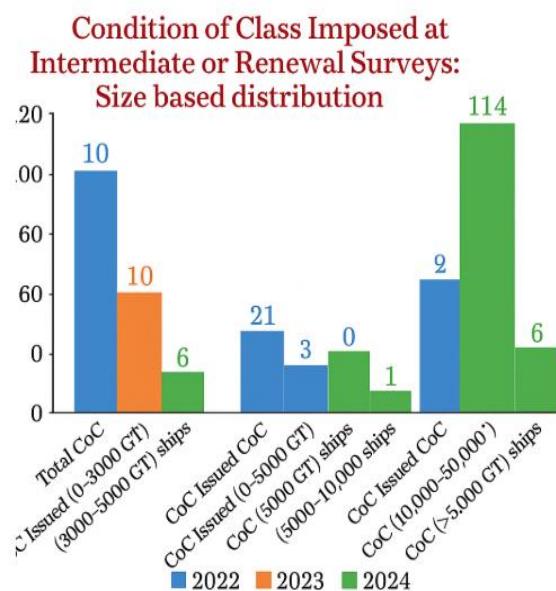
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## Condition of Class imposed during Intermediate and Renewal Surveys

The class renewal surveys include extensive examinations to verify that the structure, main and essential auxiliary machinery, systems and equipment of the ship are in a condition which satisfies the relevant Class Rules. It is carried out after 5-years and results in issuance of Certificate for another 5-years. However, it is noted that a number of ships have been issued with a CoC after intermediate and renewal surveys indication of poor planning by ship owners.



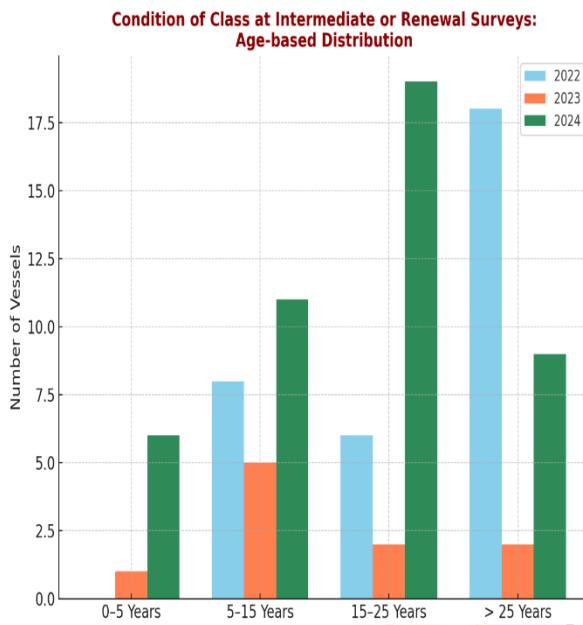
In 2024, Hull and Machinery CoCs are **almost evenly split**. Hull CoCs are slightly higher, making up just over half of all CoCs imposed during Intermediate & Renewal Surveys. This balance suggests **both structural and mechanical issues** are driving the large 2024 spike — not just one category.



Main 2024 surge comes from **3000–5000 GT ships** (21 cases) and **>50,000 GT ships** (6 cases), plus the overall jump in **Total CoC**.

Smaller ships (0–3000 GT) remain steady, mid-size ships (5000–10,000 GT and 10,000–50,000 GT) declined.

The shift toward more **mid-small and very large vessels** in 2024 suggests targeted inspection patterns or emerging compliance issues in those size categories.



**2023** saw a general decline in conditions of class across all age groups — possibly due to fewer inspections, fleet retirements, or underreporting.

**2024** shows a sharp **increase in conditions across all age categories**, especially in the **15–25 year segment**, which now poses the highest risk.

Figure 39. Condition of Class imposed during intermediate and renewal surveys



## Companies and Ships being imposed these condition of class

*Table 50. Condition of Class imposed at Annual/Renewal & Intermediate Surveys*

AN = Annual Surveys IM = Intermediate Surveys RN= Renewal Surveys

Name of Management Company	2024				2023			
	Condition of Class Imposed				Condition of Class Imposed			
	Total/Number of Ship on which CoC imposed	Hull CoC	Machinery CoC	Survey CoC Imposed	Total	Hull CoC	Machinery CoC	Survey CoC Imposed
A.K. Ship Management & Services	1/1	0	1	IM	0	NA	NA	NA
Adani Ports And Special Economic Zone Limited	1/1	0	1	AN	1/1	0	1	AN
AFCONS Infrastructure Ltd.	1/1	0	1	AN	0	NA	NA	NA
Amber Shipping & Logistics Pvt Ltd	2/2	0	2	AN	1/1	1	0	AN
Aqua Trans Liner Pvt. Ltd.	None	NA	NA	NA	1/1	0	1	AN
Ambuja Cements Limited	1/1	0	1	AN	0	NA	NA	NA

Arc Offshore India Private Limited	None	NA	NA	NA	1	1	0	IN
Asmi Ships Pvt. Ltd.	3/1	2	1	AN	2/1	2	0	AN
Castle Ships Pvt. Ltd	1/Passenger Ship	1	0	AN	0	NA	NA	NA
Cochin Port Trust	1	1	0	RN	0	NA	NA	NA
Dredging Corporation of India Ltd.	2/2	0	2	AN & IN	0	NA	NA	NA
Fact Engineering Works	1/1	1	0	AN	0	NA	NA	NA
Glory Ship Management Private Limited	None	NA	NA	NA	1	1	0	RN
Hoger Offshore & Marine Pvt. Ltd.	0	NA	NA	NA	2/2	1	1	AN & RN
Kerala Shipping & Inland Navigation Corpn. Ltd.	0	NA	NA	NA	1/1	1	0	AN

Marine Infrastructure (Goa) Pvt. Ltd.	1	0	1	RN	0	NA	NA	NA
Nautilus Shipping India Pvt. Ltd	0	NA	NA	NA	1	0	1	1234IN
Naval Science & Technological Lab	1/1	0	1	AN	0	NA	NA	NA
Oil and Natural Gas Corporation Ltd	6/2	5	5	RN: 5 AN:2	1/1	1	0	RN
Raj Shipping Agencies Ltd.	0	NA	NA	NA	2/2	2	0	AN:1 IN:1
Samson Maritime Ltd.	6/5	2	4	AN:4 IN:1	2/2	1	1	AN
Shreeji Shipping	0	NA	NA	NA	1/1	1	0	AN
Sima Marine (India) Pvt. Ltd.	2/1	2	0	AN	0	NA	NA	NA
SSR Marine Services Pvt. Ltd.	2/2	2	0	AN	0	NA	NA	NA

Suchna Marine Services Private Limited	1/1	0	1	IN	0	NA	NA	NA
SCI Ltd.	14/12	9	5	AN:6 IN:2 RN:6	7/7	1	6	AN:3 IN:3 RN:1
Transworld Fleet Management India Pvt. Ltd.	4/2	1	3	AN:1 RN:3	5/3	3	2	AN
VR Maritime Services Private Limited	0	NA	NA	NA	1/1	1	0	AN



## Condition of Class as a Performance Indicator

The inference drawn from above statistical analysis are:

*Table 51. Names of Companies whose managed vessels were issued only one condition of class at completion of Annual/ Renewal/ Intermediate Surveys*

S. No	Management Company	S. No	Management Company
1	A.K. Ship Management & Services	2	Afcons Infrastructure Ltd
3	Aqua Transliner Pvt. Ltd.	4	Ambuja Cements Limited
5	Arc Offshore India Private Limited	6	Castle Ships Pvt. Ltd
7	Cochin Port Trust	8	Fact Engineering Works
9	Glory Ship Management Private Limited	10	Kerala Shipping & Inland Navigation Corpn. Ltd.
11	Marine Infrastructure (Goa) Pvt. Ltd.	12	Nautilus Shipping India Pvt.Ltd
13	Naval Science & Technological Lab	14	Shreeji Shipping
15	Suchna Marine Services Private Limited	16	VR Maritime Services Private Limited

Table 52. *Name of Companies with two CoCs on one ships or CoC on two ships in last two years*

S. No	Management Company	S. No	Management Company
1	Adani Ports and Special Economic Zone Limited	2	Dredging Corporation of India Ltd.
3	Hoger Offshore & Marine Pvt. Ltd.	4	Raj Shipping Agencies Ltd.
5	Sima Marine (India) Pvt. Ltd.	6	SSR Marine Services Pvt. Ltd.

Table 53. *Name of Companies with a number of CoCs issued and that too on a number of ships*

S. No	Management Company	S. No	Management Company
1	Amber Shipping & Logistics Pvt Ltd	2	Asmi Ships Pvt. Ltd.
3	Oil and Natural Gas Corporation Ltd.	4	Samson Maritime Ltd.
5	Shipping Corporation of India Ltd.	6	TW Ship Management Pvt. Ltd.

50-80% of all Condition of Class at periodical surveys (Annual/Intermediate/Renewal) are imposed on vessels less than 10,000 GT indicating poor maintenance regime by these size of ships on coast, non-information of defects to RO/Directorate and operation with defects.

Hull and Machinery COC imposed are roughly equal in numbers indicating poor maintenance and planning in both hull and machinery part of the ship.

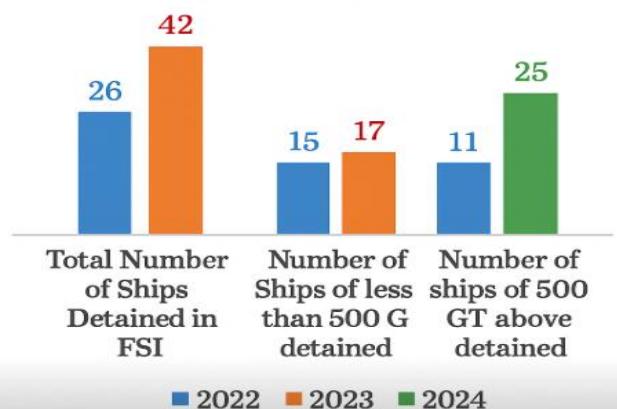
In terms of percentage a large percentage of ships in range of 5-15 years of age are being imposed a CoC at Intermediate or Renewal Surveys. At present the FSI of these ships are conducted once in 2-Years. **There is a need to monitor these size of ships and if required FSI frequency may be reduced.**

Table 54. The poor performing ships, (those with more than 1 CoC or issued CoC in both 2022 & 2023)

Name of Ship	Age/Type	Managed by
ARK PRESTIGE	28/ Oil cum Chemical Carrier	Asmi Ships Pvt. Ltd.
SM KAVERI	36/Oil Tanker	Sima Marine (India) Pvt. Ltd.
SAGAR JYOTI	41/MODU	ONGC Ltd.
OCEAN JADE	11/AHT/Offshore Supply Vessel	Samson Maritime Ltd.
SSL VISAKHAPATNAM	27/Container Ship	Transworld Fleet Management India Pvt. Ltd.
SWARNA PUSH	14/Oil Tanker	SCI Ltd.
SSL BRAHMAPUTRA	20/Container Ship	Transworld Fleet Management India Pvt. Ltd.
SSL VISAKHAPATNAM	27/Container Ship	Transworld Fleet Management India Pvt. Ltd.

## Flag State Inspections and Detentions

### Ships detained under FSI: Whether require compliance to ISM Code?

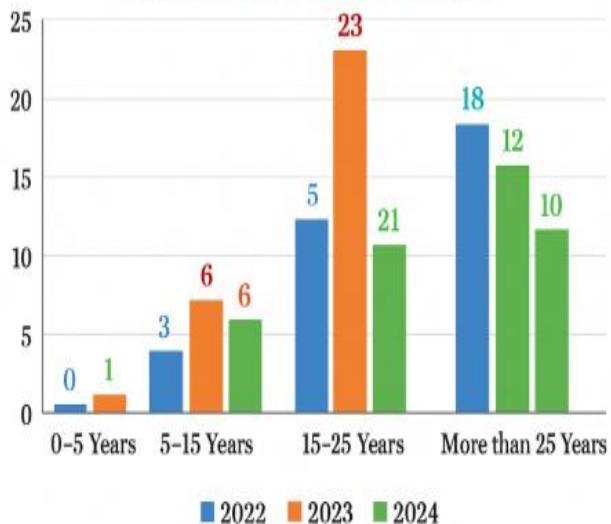


Only 24% of ships detained were under 500 GT, hence not subject to ISM Code.

A significant 76% were 500 GT and above, indicating most 2024 detentions relate to ships requiring ISM Code compliance.

This differs from prior years (2022–2023) where ships <500 GT formed 40–58% of detentions.

### Age based detentions of Ships

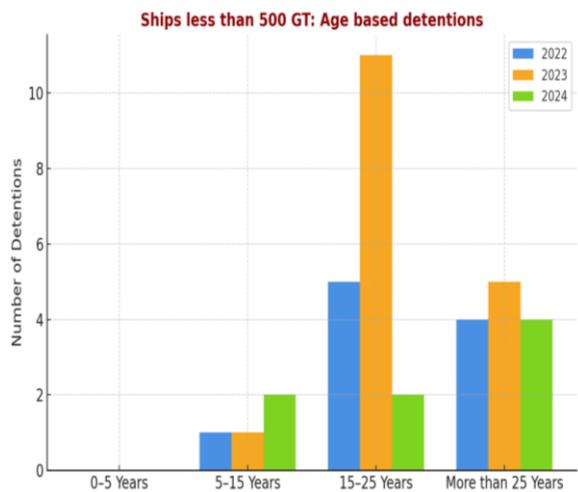


Most detentions occurred in the 15–25 year age group (13 ships), though fewer than in 2023 (23).

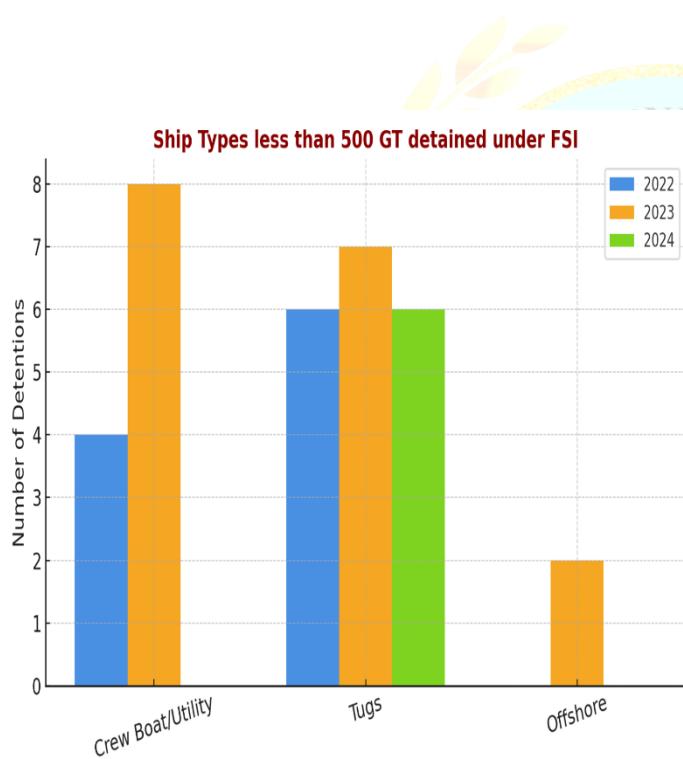
5–15 year ships saw a slight increase to 7 (from 6 in 2023).

Detentions of older ships (>25 years) dropped sharply to 4, continuing a 3-year decline.

Newer ships (0–5 years) continue to pose low detention risk — only 1 detention in 2024.



90% of the ships detained under FSI of less than 500 GT are above 15 years of age and these ships are inspected every year and there is no need to enhance the frequency between two inspections considering the



Tugs are consistently the most detained ship type under 500 GT across all years.  
 Crew Boat/Utility vessels saw a spike in 2023 but completely disappeared from 2024 detentions.  
 Offshore vessels showed minor presence in 2023 only.  
 In 2024, **all detentions under 500 GT were of Tugboats**, indicating a focused risk or compliance issue in this segment. The complete absence of detentions in the **Crew Boat** and **Offshore** categories marks a **significant improvement** or reduced operational presence in those segments.

**Figure 40. Flags state inspections and detentions**

Table 55. FSI Performance of Companies managing ships less than 500 GT

Shipping Company	2024		2023	
	Name of Vessel detained	Age/Type	Name of Vessel detained	Age/Type
Adsun offshore pvt Ltd	TAURUS 24	17		
	REL DARSHAN	15		
Acoms India Pvt. Ltd.			ACOMS 11 < 3M	25/Utility Vessel
Allianz Offshore Services Private Limited			OLYMPUS	15/Offshore Support
Amber Shipping & Logistics Pvt Ltd			MP WORKBOAT 1 < 3-M	21/Utility Vessel
			PFS SUPPLIER <3-M	23/Supply
Arc Offshore India Private Limited			Chandra Sun <3M	17/Tug
Bapu's Shipping South Gujarat			IVY <3M	15/Tug
Bhoir Offshore Services			SHIVALI II	23/Tug
Castle Ships Pvt. Ltd			HARI ARADHANA	23/Oil Tanker
Craftway engineers Ltd	OCEAN CREWZER III	Other type/9		
Delta Maritime & Industrial Skill Training Institute Pvt Ltd.			Shivam <3M	35/Utility Vessel
Dolphin offshore pvt Ltd	MARINA MERCURY	27/Tug boat		
Equip Trans Logistics Pvt. Ltd.			SAMARTH	14/Offshore Support
			SHAKTI <3M	20/Tug
Eagleburgmann	KNK JYOTI	7/Tug		
Equip trans logistics pvt Ltd	ADINATH	Bulk Carrier/17		
Fairplay Shipping And Logistics Private Limited			M.V. - MM FAIR <3-M	30/General Cargo
			SEA SIDDHEE	8/General Cargo
Gaur Hari Marine Services Pvt. Ltd	MALAVIYA EIGHTEEN	22/Other type of ships	MPB-II	16/General Cargo Ship
Hind Offshore Pvt. Ltd.			SEA PATRIOT	47/Accommodation Barge
			SEA STALLION	30/Accommodation Barge

			SEA JAGUAR	30/Accommodation Barge
			SEA MELODY <3M	46/Tug
Hal Offshore Limited			HAL ANANT	41/Offshore Supply
JSW Jaigarh port limited	JSW SINHGAD	Other type ships/2020		
	JSW PRATAPGAD	Other type ships/2020		
	JSW RAIGAD	Other type ships/2020		
L & T HYDROCARBON ENGINEERING LIMITED			LTB 300	13/Pipe Laying Cum Accommodation Barge
Lilly Maritime Pvt. Ltd.			Sudharshan	31/Offshore Support
MJ Marine Services Private Limited			VMS 21	33/Crew Boat
			GOMTI <3M	42/Workboat
Nautilus Shipping India Pvt. Ltd			JSW LOHGAD	4/General Cargo
Orion Offshore Services Pvt. Ltd.			Orion Lakshmi <3M	12/Utility Boat
PARADIGM MARINE& TECHNICAL			Parasea Two	26/Tug
Proactive Ship Management Pvt. Ltd.			TERA	16/Tug-Supply Vessel
PSR Marine Services			Teja	17/Utility Vessel
Sea breeze Ship management	COURAGE	21/Oil tanker		
Samson Maritime Ltd.			OCEAN AMMOLITE	18/Offshore Support
			OCEAN GARNET	17/Tug-Supply Vessel
			OCEAN TANZANITE	14/Tug –Supply Vessel
Shivansh Offshore & Marine Services Pvt. Ltd.	SHIVANSH PRIYA	19/Other type of ships	SHIVANSH PRIYA	19/Offshore Support
Shipping Corporation of India Ltd.			VISHVA DIKSHA	11/Bulk Carrier
SSR Marine Services Pvt. Ltd			MEHUL <3M	24/Tug
Shree laxmi eneterprises	ANASUYA	27/Tugboat		
Sonar marine consultant pvt ltd	AQUATOR 2	8/Other type ships		
Super tug offshore pvt ltd	MERMAID 3	21/Tug		

Tuticorin Port Trust			Tuticorin <3M	17/Tug
Varuni marine services pvt Ltd	MAHI	42/Other type of ships		
Vedant Ship Management (I) Pvt. Ltd.			Swarna	23/Tug
Vindhyawashini Marine Services Pvt. Ltd.			KPS	19/Crew Boat
			KPS Shivali	17/Crew Boat
VR Marine Services Pvt. Ltd.			PREM PRIDE	25/FPSO

Table 56. Companies with only 1 detention under FSI in last two years

S. No	Management Company	S. No	Management Company
1	Adsun offshore pvt ltd	2	Acoms India pvt ltd
3	Allianz Offshore Services Private Limited	4	Amber Shipping & Logistics Pvt Ltd
5	Arc Offshore India Private Limited	6	Bapu's Shipping South Gujarat
7	Castle Ships Pvt. Ltd	8	Coastal Marine Construction & Engineering Ltd.
9	Lilly Maritime Pvt. Ltd.	10	Craftway engineers Ltd
11	Delta Maritime & Industrial Skill Training Institute Pvt Ltd	12	Dolphin offshore pvt ltd
13	Equip Trans Logistics Pvt. Ltd	14	Eagleburgmann
15	Equip trans logistics pvt ltd	16	Fairplay Shipping And Logistics Private Limited
17	Hind Offshore Pvt. Ltd.	18	JSW Jaigarh port limited
19	L & T HYDROCARBON engineering limited	20	Lilly Maritime Pvt. Ltd.
21	MJ Marine Services Private Limited	22	Nautilus Shipping India Pvt. Ltd
23	Orion Offshore Services Pvt. Ltd.	24	PARADIGM MARINE& TECHNICAL

25	Proactive Ship Management Pvt. Ltd.	26	PSR Marine Services
27	Sea breeze Ship management	28	Samson Maritime Ltd.
29	Samson Maritime Ltd.	30	Shivansh Offshore & Marine Services Pvt. Ltd.
31	Shipping Corporation of India Ltd.	32	SSR Marine Services Pvt. Ltd
33	Shree laxmi eneterprises	34	Sonar marine consultant pvt ltd
35	Super tug offshore pvt ltd	36	Tuticorin Port Trust
37	Varuni marine services pvt ltd	38	Vedant Ship Management (I) Pvt. Ltd.
39	Vindhyareshini Marine Services Pvt. Ltd.	40	VR Marine Services Pvt. Ltd.

*Table 57. Companies with multiple detentions under FSI in last two years or 1-dention within 3-M of AS/Intermediate/Renewal Surveys:*

S. No	Management Company	S. No	Management Company
9	Gaur Hari Marine Services Pvt. Ltd	20	Shivansh Offshore & Marine Services Pvt. Ltd.

## Port State Detention Statistics

- i. There was 1 PSC detention in 2022 and 9 detentions in 2023. The detention in 2022 was in TOKYO MoU while that in 2023 indicates 7 detentions in TOKYO MOU and 1 each in Paris and MED-MOU.
- ii. Except 1 vessel detained in 2023 which was age above 15-years, all other vessels were between 10-15 years of age and in this category 1 FSI is conducted every two-years.
- iii. The Companies with PSC detentions are:
  - 4-Vessels managed by Shipping Corporation of India detained in 2023.
  - 3-Vessels of GESCO detained in 2023.
  - 1 Vessel of TW Ship Management was detained in 2022 and also 1 in 2023.
  - 1 Vessel managed by Arka Global Marine Services LLP was detained in 2022.
- iv. Out of 10 vessels detained in 2022 and 2023, there were 6 Bulk Carriers and 4 Oil Tankers.

Table 58. Age based detentions: PSC: 2021-2023

Year	0-5 Years	5-10	10-15	15-20	20-25	25 & above	Total
2024	0	0	6	11	8	4	39
2023	0	0	8	1	0	0	9
2022	0	0	1	0	0	0	1
2021	1	1	0	1	1	0	4

Table 59. Type based detentions

Year	General Cargo	Bulk Carrier	Oil Tanker	Gas Carrier	Total
2024	7	14	7	0	28
2023	0	5	4	0	9
2022	0	1	0	0	1
2021	1	2	1	0	4

Table 60. MoU based detentions

Year	Tokyo	Paris	Black Sea	MED MoU	Total
2024	1	0	0	0	1
2023	7	1	0	1	9
2022	1	0	0	0	1
2021	2	1	1	0	4

## Port State Performance as a Performance Indicator

Table 61. Companies with multiple detentions under PSC in last two years or a single detention but within 3-M of AS/Intermediate/Renewal Surveys:

S. No	Management Company
1	Anglo eastern ship management

## International Safety Management Audits as a Performance Indicator

There were on an average 1-1.7 findings per DOC Audit in 2021-2023, while there were 1.8-2 findings per SMS Audit conducted in 2022-2023.

*Table 62. The Ship Management Companies with more than 3 findings in any only one DOC Audit in last three years or only one SMC Audits on managed ships in last two years*

S. No.	Name of Company	Type of Ship managed	S. No.	Name of Company	Type of Ship managed
1	Apeejay shipping limited	Bulk Carrier	2	Bravo ship management	Bulk Carrier
3	Executive Ship Managemet Pvt. Ltd	Bulk Carrier	4	Fluyt Maritime Private Limited	Bulk Carrier
5	Nautilus Shipping India Pvt. Ltd.	Bulk Carrier	6	Panbulk Marine Services Pvt. Ltd.	Other Cargo Ships
7	T-Erudite Ship Management Pvt. Ltd	Other Cargo Ships	8	The Great Eastern Shipping Company Ltd	Other Cargo Ships
9	The India Cements Limited, ( Shipping Division)	Other Cargo Ships	10	Tolani Shipping Company Limited	Other Cargo Ships
11	Transword Fleet Management India Pvt. Ltd.	Other Cargo Ships	12	Vridhi Maritime Private Limited	Other Cargo Ships
13	ASP Ship Management (India) Ltd	Other Cargo Ships	14	Columbia Aurus Ship Management Pvt. Ltd	Other Cargo Ships

15	Varuni Marine Services Pvt. Ltd	Other Cargo Ships	16	JBS Marine and Logistics Private Ltd.	Other Cargo Ships
17	Columbia Aurus Ship Management Pvt. Ltd	Other Cargo Ships	18	Samudra Manthan Offshore India Pvt. Ltd.	Other Cargo Ships
19	VR Maritime Services Pvt. Ltd.	Other Cargo Ships	20	Seaport Shipping Pvt. Ltd.	Other Cargo Ships
21	Sushe Marine Services Private Limited	Other Cargo Ships	22	ABS Marine Services Pvt Ltd.	Other Cargo Ships
23	Greatship India Ltd.	Other Cargo Ships	24	Shivansh Offshore and Marine Services Pvt Ltd	Other Cargo Ships
25	Proactive Ship Management Pvt. Ltd	Other Cargo Ships	26	Varuni Marine Services Pvt. Ltd	Other Cargo Ships
27	Seamac Limited	Other Cargo Ships	28	Sadhav Shipping Ltd	Other Cargo Ships
29	ITT Shipping (Private) Limited	Other Cargo Ships	30	ITT Shipping (Private) Limited	Other Cargo Ships
31	Vision Maritime Pvt. Ltd.	Other Cargo Ships	32	Van Oord India Private Limited	Other Cargo Ships
33	Hind Offshore Pvt. Ltd.	Other Cargo Ships	34	IGOPL Offshore Pvt. Ltd.	Other Cargo Ships
35	Dredging Corporation of India Ltd.	Other Cargo Ships	36	TCI Seaways (A Division of Transport Corporation of India Ltd.)	Other Cargo Ships

37	Adsun Offshore Diving Contractors Pvt Ltd	Other Cargo Ships	38	MJ Marine Services Private Limited	Other Cargo Ships
39	Hal Offshore Ltd	Other Cargo Ships	40	MAT Marine Services Pvt. Ltd.	Other Cargo Ships
41	Ocean Sparkle Limited	Other Cargo Ships	42	Libraa Ship Management Pvt. Ltd.	Other Cargo Ships
43	Allianz Offshore Services Private Limited	Other Cargo Ships	44	Vidhyashwini Offshore Services Pvt. Ltd.	Other Cargo Ships
45	Equip Trans Logistics Private Limited	Other Cargo Ships	46	Raj Shipping Agencies Ltd	Other Cargo Ships
47	Seaport Shipping Pvt. Ltd.	Other Cargo Ships			



*Table 63. The Ship management Companies with more than 3 findings in more than one DOC Audit in last three years or in SMC Audits on managed ships in last two years or in combination*

S. No.	Name of Company	Type of Ship managed	S. No.	Name of Company	Type of Ship managed
1	Bravo Ship Management Pvt. Ltd.	Bulk carrier	2	Fluyt Maritime Private Limited	Bulk carrier
3	Panbulk Marine Services Pvt. Ltd.	Bulk carrier	4	Columbia Aurus Ship Management Pvt. Ltd	Other Cargo Ships
5	Seaport Shipping Pvt. Ltd.	Other Cargo Ships	6	Sushe Marine Services Private Limited	Other Cargo Ships
7	Shivansh Offshore and Marine Services Pvt Ltd	Other Cargo Ships	8	Proactive Ship Management Pvt. Ltd	Other Cargo Ships
9	Sadhav shipping limited	Other Cargo Ships	10	Hind Offshore Pvt. Ltd.	Other Cargo Ships
11	MAT Marine Services Pvt. Ltd.	Other Cargo Ships	12	Allianz Offshore Services Private Limited	Other Cargo Ships
13	Raj Shipping Agencies Ltd	Other Cargo Ships			

## MLC Inspections as a Performance Indicator

In this year report we have taken seafarer salary and employment agreement as key inputs for poor performance by shipping companies.

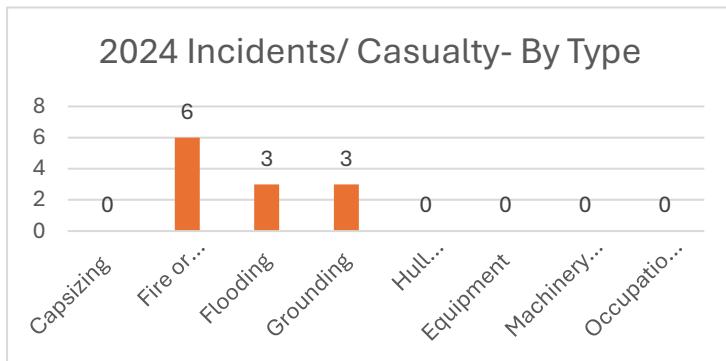
*Table 64. The Companies with issues in Seafarer Employment Agreements*

S. No	Management Company	S. No	Management Company
1	Amba shipping and logistics	2	Lakshwadeep development corporation
3	Sea Breeze Ship Management Pvt. Ltd.	4	Global offshore services ltd
5	Hoger offshore marine	6	Lakshdweep development corporation

*Table 65. The Companies with issues in related to monthly payment of wages or monthly account of wages not given or payment less than CBA*

S. No	Management Company	S. No	Management Company
1	Lakshdweep development corporation	2	Ambuja shipping
3	Hoger offshore & Marine	4	Suchna marine services

## Casualty Statistics



Most casualties noted related to Fire on ships.

Table 66. Type Incidents/ Casualties by ship type and year

Sl.No	Ship Type	No of Incidents/ Casualty Yearly 2024	Casualty / Incident Type
1	BulkCarrier	5	Grounding (2) and Fire Explosion (3)
2	Gen Cargo	1	Flooding (1)
3	Oil Product Tanker	2	Fire & Explosion (1) / Flooding (1)
4	OSV	1	Fire & Explosion (1)
5	Passenger	2	Fire & Explosion (1) / Flooding (1)
6	Tug	1	Grounding (1)

Other cargo ships are noted to have maximum casualties.

Table 67. *Loss of Life & Age profiling of incidents/casualties*

### **Loss of Life (2024)**

Year	Total no of Loss of Life	Casualty Type
2024	2	Fire & Explosion

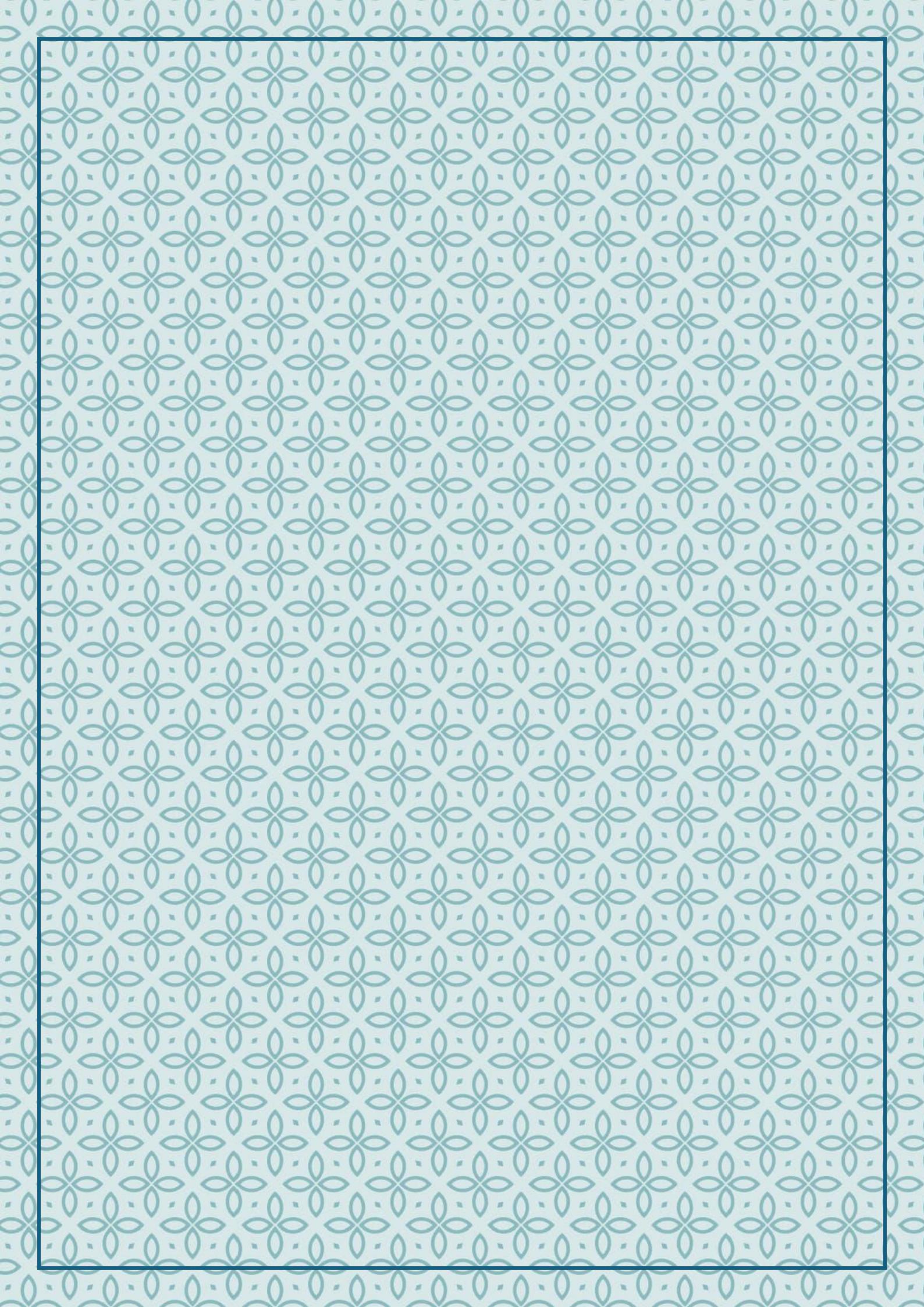
### **Age Profiling of Incidents / Casualties (2024)**

S.no	Age Group	No of incidents/ casualties- Year
1	0-5 years	0
2	05-10 years	1
3	10-15 years	2
4	15-20 years	5
5	20-25 years	3
6	>25 years	1
	Total	12

Vessels in 15-20 years of age bracket apart from those above 20 years are noted to have maximum casualties.

Table 68. *Tonnage-wise incidents / casualties*

Sl No	Gross Tonnage	No of Incidents/ Casualties- Yearly
1	<500	2
2	501 <GT>5000	1
3	5001<GT>10000	5
4	10000<GT>50000	3
5	>50000	1
	Total	12



# Chapter V: The Performance of Recognized Organization

Organizations with which Recognized Organization Agreement Signed by Indian Maritime Administration in accordance with International Conventions such as SOLAS, MARPOL, BWM Convention, Load Line & Tonnage Measurement etc.: The Organizations recognized by Indian Maritime Administration to carry out statutory surveys and Certification of Indian Registered Cargo Ships are in alphabetical order: American Bureau of Shipping, Bureau Veritas, DNV (AS), Indian Register of Shipping, Korean Register of Shipping, Lloyd's Register of Shipping, NKK & RINA.

## Need for Recognized Organizations

- i. SOLAS and the other International Conventions permit the flag Administration to delegate the inspection and survey of ships to a Recognised Organization (RO).
- ii. This is because many flag Administrations do not have adequate technical experience, man-power or global coverage to undertake all the necessary statutory inspections and surveys using its own staff.
- iii. It is now mandatory, as SOLAS now requires that ships should be constructed in accordance with rules of a Classification Societies or Flag State. It may be noted that SOLAS & other Conventions provide broad requirements, while the Class Rules provide for technical details.
- iv. The degree to which a flag State may choose to delegate authority to a RO (Class Society) is for each flag State to decide, with the authority granted being clearly identified in the relevant memoranda of understanding agreed between the Class Society and the Administration.

## Oversight of Recognized Organization: Why?

As per IMO Recognized Organization Code, the Administration should establish a system to ensure the adequacy of work performed by the organizations authorized to act on its behalf.

Mechanism Used by Indian Maritime Administration to keep an Oversight over the functioning of RO

The oversight of the functions delegated to RO is carried out through all of the following measures:

1. **Conduct of Annual Audits of Recognized Organization through specific clause in RO Agreement** relating to Administration's supervision of duties delegated to the organization through Vertical Contract Audit, annual audit of ROs and supplementary surveys. At present Indian Administration is conducting annual audits of all RO and VCA for RINA along with Annual Audits.

2. **Conduct of Flag State Inspection** (if the ship is in India) **or a General Examination** (by another RO who has not conducted statutory surveys) within 1-3-M of Annual/Intermediate/Renewal Surveys (periodicity based on age of vessel) via MS Notice 4 of 2017. **Reasons given in next Paragraph.**
3. Surveys/Audits/Inspections exclusively conducted by Indian Administration
  - i. Conduct of Periodical Safety Equipment Surveys if offered in India.
  - ii. Conduct of MLC Intermediate Inspections if offered in India.
  - iii. Conduct of SMC Intermediate and ISPS Intermediate Audits in India.
  - iv. Exclusive conduct of ISM-DOC Audits.
4. **Surveys where Indian Maritime Surveyors participate with RO Surveyors:** Participation in renewal surveys of the Safety Construction (SAFCON), Safety Radio (SRT) and MARPOL Annex-I (IOPP) of Indian ships while being undertaken in India.
5. Grant of exemption/equivalent, dispensation, or extensions only after approval of Competent Authority in Directorate.

## Conduct of Flag State Inspections within 1-3 M after the Initial/ Annual/ Periodical/ Intermediate Surveys by RO

- i. The reason for 1-M after endorsement for Surveys is because, it was found that RO Surveyors are only endorsing Statutory certificates after completion of surveys once the FSI is completed, so that RO could not be questioned for any defect noted.
- ii. The reason to complete the FSI within 3-M is because as per International PSC MoU norms (which is also used for marking RO responsibility in FSI), a detainable deficiency in PSC inspections is associated with the RO if it is A serious deficiency in equipment or non-structural fittings (such as fire main, air pipes, cargo hatches, rails, masts, ventilation trunks/ducts, accommodation and recreational facilities etc.) AND it is less than 90 days since the last survey conducted by the RO.

## Data for determining the Performance of ROs

- i. **Performance of Indian Flag & ROs in PARIS & TOKYO MoU:** Most Port State MoUs rate flag state and Classification Societies based on the deficiencies and detentions of their flagged ships or they being RO for the ships (i.e carried out last Statutory Survey and Certification) respectively in last 3-years and a risk rating is assigned. Higher risk rating to both Flag & RO can lead to increased frequency of inspections in that MoU of that ship either flagged with that Flag or have that Class as RO. This is list is published every year and is a good indicator of performance of RO since most of the Statutory Surveys and ISM-SMC Audits are carried out by RO in abroad.
- ii. **Detentions of Indian Ships under FSI:** Whether the RO has done only Class Surveys or both Class and Statutory Surveys? Nature of detainable deficiencies etc.
- iii. Trends in FSI detentions of ships in FSI where the Surveys were done by RO.

- iv. Trends in Port State Detentions of Indian Ships and Surveys done by RO.
- v. Trends in Ports State Detentions of Foreign Ships in India and Surveys done by RO.
- vi. **Review of recommendations for extension/dispensation/exemption:** An example of the punitive action taken through this means is de-authorization of a Surveyor for conduct of Statutory Surveys on Indian ships.
- vii. **Reports from MMD:** An example is suspension of RO status of one of the Class Society for almost a year.
- viii. **List of Ships where Statutory Surveys** done by RO and its detention rates under FSI.



## Indian Flag Performance in Paris & Tokyo MoU

How major Port State MoUs such as Paris & Tokyo MoU rate Flag State Performance in Port State detentions? The Performance of each Flag is determined using following statistical formulae:

$$U_{black\_to\_grey} = N \cdot p + 0.5 + z \sqrt{N \cdot p \cdot (1-p)}$$

$$U_{white\_to\_grey} = N \cdot p - 0.5 - z \sqrt{N \cdot p \cdot (1-p)}$$

N = Number of Inspections in Past 3-Years

P = Probability of detentions permitted by PARIS/TOKYO MoU: 7%

Z = 1.654 for certainty level of 95%

Rating is then determined based on excess factor or probability of detention above 7% and below 7% as below:

- i. Number of actual detentions in past three years above  $U_{Black\ to\ Grey}$  have significantly worse than average performance and put in black list.
- ii. When actual detentions is below  $U_{White\ to\ Grey}$  it means significantly better performance than average and flag is put in White list. When the amount of detentions is between the two limit the flag is put in Grey List.
- iii. Then using the actual detentions, probability of detentions based on actual detentions is calculated and flags are rated.
- iv. **White List Flags:** Excess Factor 0 to -1 and lower the excess factor better is the performance.
- v. **Grey List:** Excess Factor between 0 and + 1; higher the excess factor, poorer the performance.
- vi. **Black List:** Excess factor 1 and above.

**Review of Excess Factor:** Normally the performance of a RO or Flag is determined using a statistical formulae and allowable detentions. As the inclusion in White, Grey & Black list of a particular Flag in a particular PSC MoU depends on number of detentions, for a Flag with only a few ships going to Paris or Tokyo MoU may take years to move from black to grey to white list, a good indicator of year by year performance is the movement of excess factor. A decrease in excess factor indicates good performance and an increase indicates poor performance. **The Indian Flag Performance in various PSC MoUs based on movement of excess factor in Paris and Tokyo is detailed below**

## Paris MoU

Table 69. Indian flag performance in Paris MoU

Annual Report	Inspections taken into account	Number of Inspection	Detentions	% Vessels detained	List	Excess Factor
2018	2016-2018	71	8	11.2%	Grey	0.88
2019	2017-2019	59	5	8.4%	Grey	0.62
2020	2018-2020	44	1	2.2%	Grey	0.18
2021	2019-2021	36	1	2.8%	Grey	0.25
2022	2020-2022	41	1	2.4%	Grey	0.21
2023	2021-2023	11	1	9.09%	Grey	0.41
2024	2022-2024	19	1	5.26	Grey	0.07

### Performance of Indian Flag in PARIS MoU: 2018-2024 (Lower Excess Factor = Better Performance)

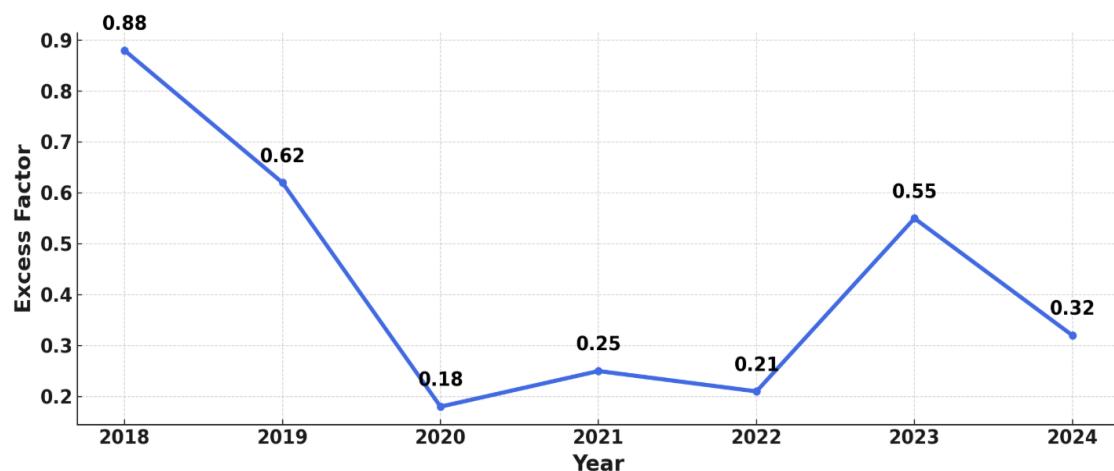


Figure 41. Performance of Indian Flag in Paris MoU

## TOKYO MoU

Table 70. Indian flag performance in Tokyo MoU

Annual Report	Inspections taken into account	Number of Inspection	Detentions	% Detentions	List	Excess Factor
2018	2016-2018	250	11	4.4%	Grey	0.04
2019	2017-2019	248	14	5.6%	Grey	0.26
2020	2018-2020	193	11	5.7%	Grey	0.30
2021	2019-2021	141	9	6.4%	Grey	0.42
2022	2020-2022	91	5	5.5%	Grey	0.35
2023	2021-2023	36	7	18.42%	Grey	0.11
2024	2022-2024	49	7	14.28%	Grey	0.06

### Performance of Indian Flag in Tokyo MoU: 2018-2024 (Lower Excess Factor = Better Performance)

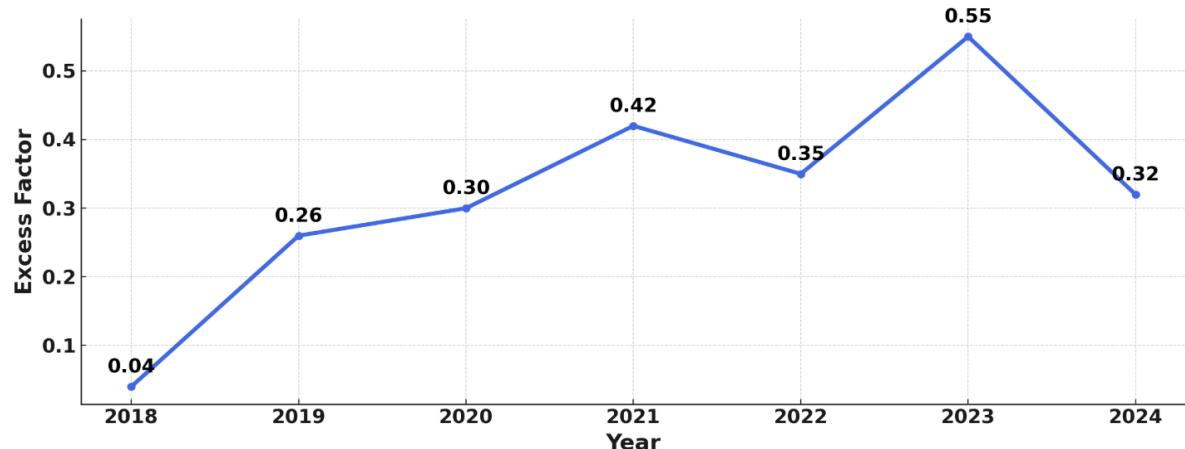


Figure 42. Performance of Indian Flag in Tokyo MoU

## Indian ROs Overall Performance in Paris & Tokyo MoU

Table 71. Movement of Excess Factor: Paris MoU

RO	2018	2019	2020	2021	2022	2023	2024
ABS	-1.95	-1.93	-1.92	-1.94	-1.97	-1.957	-1.962
BV	-1.74	-1.73	-1.75	-1.73	-1.62	-1.642	-1.618
DNV (AS)	-1.88	-1.9	-1.91	-1.92	-1.87	-1.896	-1.896
IRS	0.49	0.54	0.51	0.28	0.37	0.288	0.238
KRS	-1.62	-1.66	-1.66	-1.56	-1.74	-1.74	-1.74
Lloyds Register	-1.86	-1.86	-1.88	-1.86	-1.78	-1.8	-1.784
NK	-1.66	-1.75	-1.79	-1.79	-1.57	-1.67	-1.656

Table 72. Movement of Excess Factor: Tokyo MoU

RO	2018	2019	2020	2021	2022	2023	2024
ABS	-1.97	-1.96	-1.96	-1.97	-1.95	-1.94	-1.92
BV	-1.8	-1.95	-1.88	-1.91	-1.89	-1.88	-1.86
DNV (AS)	-1.96	-1.95	-1.94	-1.94	-1.96	-1.95	-1.93
IRS	-0.65	-0.62	-0.26	N	N	-0.18	-0.22
KRS	-1.97	-1.96	-1.93	-1.84	-1.72	-1.75	-1.7
Lloyds Register	-1.9	-1.87	-1.84	-1.81	-1.84	-1.83	-1.82
NK	-1.89	-1.91	-1.92	-1.92	-1.87	-1.86	-1.85
RINA	-1.93	-1.94	-1.98	-1.98	-1.83	-1.82	-1.8

## Indian Flag Administration Performance vs IRS Performance

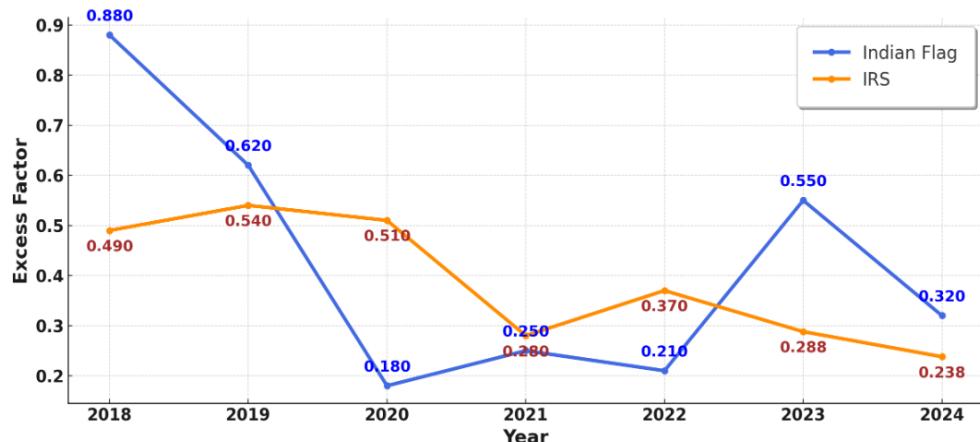


Figure 43. Trends in performance of Indian Flag vs IRS as RO in Paris MoU (2018-2024)

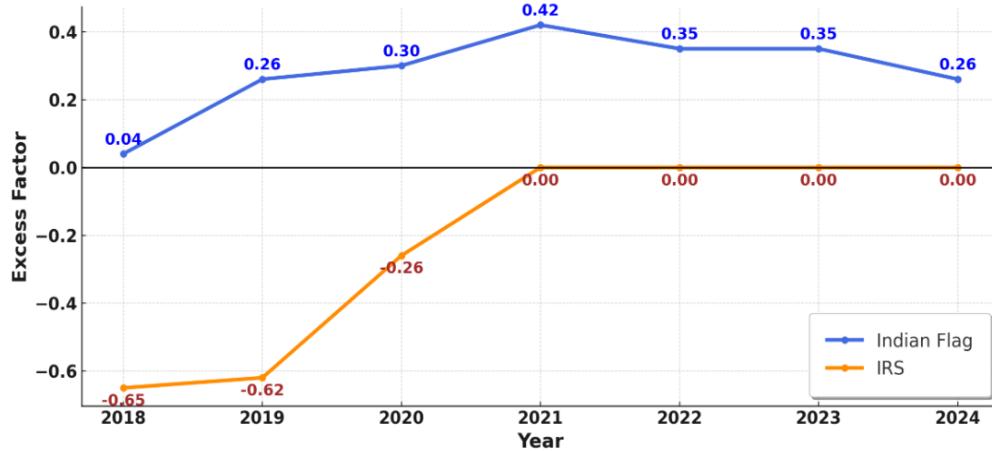


Figure 44. Trends in performance of Indian Flag vs IRS as RO in Tokyo MoU (2018-2024)

### Inferences

- i. Indian Flag Performance in PSC is linked to IRS performance.
- ii. When the performance of Indian flag improves in one MoU, it reduces in other MoU. As the performance dips, the Indian ships move to another MoU to prevent frequent inspections.

## Performance of Indian Recognized Organizations

### A. Survey and Certification of Indian Ships conducted by RO & Flag State Performance of these Ships

Table 73. *Statutory Surveys and RO performance in FSI*

Vessel less than 5000 GT: No of ships					Vessel between 5000 GT and 50,000 GT: No of ships surveyed						Vessel more than 50,000 GT: No of ships surveyed			
2020	2021	2022	2023	2024	2020	2021	2022	2023	2023	2024	2020	2021	2022	2023
6	6	6	4	1	4	4	4	4	6	6	6	7	7	0
5	1	1	1	0	0	0	0	2	2	3	0	0	0	0
3	2	0	0	0	4	8	4	4	10	4	0	0	0	0
636	585	580	384	367	212	248	97	103	44	44	0	0	0	0
0	0	0	0	0	0	8	8	4	7	7	0	0	0	0
0	0	0	0	0	0	12	20	43	20	20	0	0	0	0
659	640	597	420	408	228	312	184	222	222	228	228	65	11	0
96.50 %	91.40 %	97.20 %	91.40 %	90.00 %	78.50 %	11.80 %	74.50 %	31.10 %	45.00 %	15.00 %	67.70 %	63.30 %	0.00 %	0.00 %
14	27	24	33	0	2	2	2	2	2	3	0.00%	0.00 %	0.00 %	0
82.40 %	93.10 %	92.30 %	91.70 %	0.00 %	11.80 %	6.90 %	7.70 %	1.10 %	8.90 %	7.70 %	100.00 %	5.90 %	0.00 %	0
82.40 %	93.10 %	92.30 %	91.60 %	0.00 %	11.80 %	6.90 %	7.70 %	8.80 %	7.40 %	8.30 %	0.00%	5.90 %	0.00 %	0
82.40 %	93.10 %	92.30 %	91.70 %	0.00 %	5.90 %	0.00 %	0.00 %	100%	5.90 %	0.00 %	0.00%	0.00 %	0.00 %	0

Table 74. *Ships detained in FSI*

Less than 5000 GT		5000 to 50000 GT			50000 GT and above	
Type	Number	Type	Number	Type	Number	
Tug Boat		Bulk Carrier		NIL		
general cargo/ multi- purpose ship		Oil Tanker				
offshore service vessel		other types of ship				
other types of ship						
<b>Total</b>		<b>16</b>		<b>9</b>		

Table 75. Ships detained in FSI

Size	Detained with-in 1-3 M of Survey		Detained with-in 3-6 M of Survey		Detained more than 6-M of Survey		Detained more than 6-M of Survey	
	Number	Statutory Surveys by						
< 5000 GT	4	IRS	9	IRS and LR	4	IRS and LR		
5000-50,000 GT	1	IRS	4	IRS	2	IRS		
<50000 GT	0		0		0		1	DNV

Inferences:

- 46% of all detentions occurred **within 3 months** of the statutory survey.
- 77% of detentions occurred **within 6 months**, raising concerns about the **quality and thoroughness** of statutory surveys conducted.

Detentions occurring **shortly after statutory surveys** imply potential **ineffectiveness or oversight issues** in the surveys themselves.

## Detentions in Port state and Flag state in 2024

Table 76. Ships detained within 3-M of last Survey in Flag State Detentions in 2024

Total FSI detentions in 2024: 25					
Name of Ship	Type	Age	GT	Last Survey prior detention	Whether detained within 3-M of last survey?
MARINA MERCURY	tugboat	27	152	Annual	Yes
MALAVIYA EIGHTEEN	other types of ship	22	2137	Annual	Yes
OCEAM CREWZER II	other types of ship	9	72	Renewal	Yes
ARK PRESTIGE	other types of ship	28	5973	Intermediate	Yes
KNK JYOTI	tugboat	7	567	Renewal	Yes

### Inferences

- i. Out of 42 vessels detained in 2023, 16 detained within 3-M of survey, that is, about 33%.
- ii. Almost 5 out of 16 (vessels detained within 3-M of surveys) were detained within 3-M of Renewal or Intermediate surveys, which are comprehensive surveys.
- iii. Most vessels detained are above 20 years and more importantly service vessels. Detentions of crew boat in large number is a high safety risk as these vessels are certified to carry large number of special personnel.

iv. 15 out 16 vessels detained within 3-M of surveys are less than 2000 GT and 9 less than 500 GT. Vessels less than 500 GT are not in the ambit of ISM and thus are not being periodically verified via other means.

*Table 77. Indian Ships detained in Port State Inspections abroad*

Name of Ship	Date of Detention/Place/PSC MoU	Last Survey prior detention/RO Conducting Statutory Surveys	Whether detained within 3-M of last survey?
DARYA SHAAN	26.04.2024 /Melbourne, VIC/ Australian Maritime Safety Authority	06.03.25	Yes

**Inferences**

- Vessel detained within 3-M of survey, that is, about 100%.
- The RO which carried out Statutory Surveys within 3-M prior detentions are IRS, LR, DNV(AS) & NK.

**B. Performance of Foreign Ships visiting Indian Ports**

Year	2020			2021			2022			2023			2024			
	RO	No of Inspections	No of Detentions	% Detention	No of Inspections	No of Detentions	% Detention	No of Inspections	No of Detentions	% Detention	No of Inspections	No of Detentions	% Detention	No of Inspections	No of Detentions	% Detention
ABS	8	0	0%	0%	5	1	20%	4	3	75%	36	1	3%	37	0%	0%
BV	23	5	22%	22%	1	0	0%	12	4	33%	1	2	200%	4	0%	0%
DNV	9	2	22%	22%	1	0	0%	8	2	25%	21	1	5%	29	0%	0%
IRS	0	0	0%	0%	0	0	0%	2	0	0%	35	0	0%	60	100%	2%
KRS	9	2	22%	22%	1	0	0%	6	2	33%	1	0	0%	0	0%	0%
LR	10	0	0%	0%	1	0	0%	8	0	0%	30	3	10%	50	0%	0%
NK	36	0	0%	0%	3	1	33%	18	3	17%	6	1	17%	9	0%	0%
RINA	0	0	0%	0%	0	0	0%	7	2	29%	0	0	0%	0	0%	0%

Table 78. *Detentions of Foreign vessels visiting Indian ports*

RO	Number of vessels detained within 3-M of survey	Number of vessels detained within 3-6 M of survey	Number of vessels detained after 6-M of survey
ABS	1	0	2
BV	2	1	1
DNV-AS	1	0	1
IRS	1	1	0
KRS	1	NA	1
LR	NA	NA	NA
NK	1	1	NA
RINA	2	NA	NA

**Detention % of various RO in PSC Inspections in India**

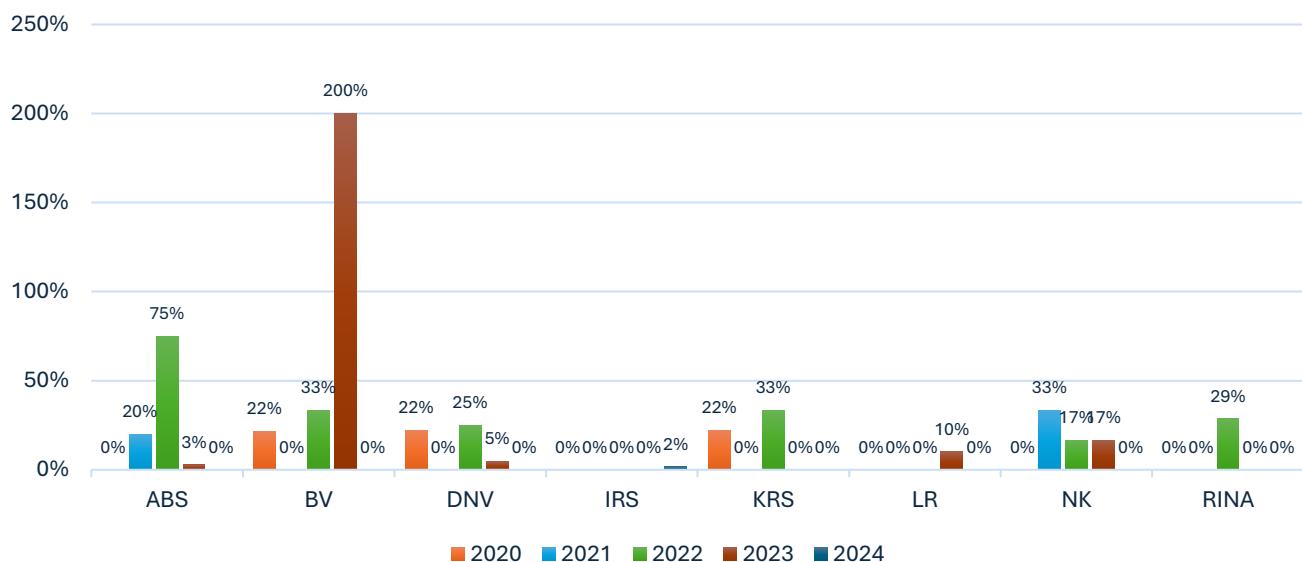


Figure 45. *Detention % of various ROs in PSC inspections in India*

**Inferences:** Out of 16 ships detained in India, 9, that is about 56% had their surveys less than 3-M from date of detention.

## Typical Issues with Certification identified during review of recommendations from RO & Punitive Action Taken

### 1. Audits of RO & Typical Findings

Table 79. Number of Findings per RO per year

Recognized Organization	Number of Findings/Observations						
	2018	2019	2020	2021	2022	2023	2024
ABS	0/0	0/0	0/2	0/0	0/1	0/0	0/0
BV	0/0	0/1	0/2	0/2	0/2	2	0/0
DNV (AS)	0/0	0/1	0/1	0/0	0/0	1/1	1/0
IRS	0/4	3/2	5/2	4/0	0/1	4/2 1+	4/3 0/3
KRS	0/0	0/1	Did not offer	0/1	0/0		
LR	0/0	0/1	0/1	0/0	0/0	2/1	
NK	0/0	0/0	0/0	0/1	0/0	1/0	0/1
RINA	0/0	2/0	Did not offer	3/1	2/0	3/1	0/2

### 2. Typical Issues Identified- 2024

- Repeated Non-compliance with RO Agreement Clauses:** Clauses 4.1.2 and 4.1.3 are consistently cited for failures to ensure compliance and effective survey/audit controls.
- Training Oversight Gaps:** Multiple instances of non-compliance with CIP inspections and ineffective monitoring of Maritime Training Institutes (MTIs).
- Documentation and Update Failures:** Non-updated rules, procedural gaps, and citizen charter mismatches indicate systemic quality assurance lapses.
- Surveyor Competency Concerns:** Findings point to qualification standards not being met, violating clause 8.4.2.
- Financial Delays and Recordkeeping:** RO performance in timely fee remittance and record updates also show administrative weaknesses.

### 3. Corrective Measures by Indian Administration

- Targeted verification of implemented actions during scheduled audits.
- RO systems related to **salary verification**, **placement validation**, and **certificate interdependence** will be focused in subsequent audits
- Templates/tools in use (e.g., for placement) will be checked for **validation status**.

### 4. Performance Analysis of Indian Flag and Recommendations to ROs

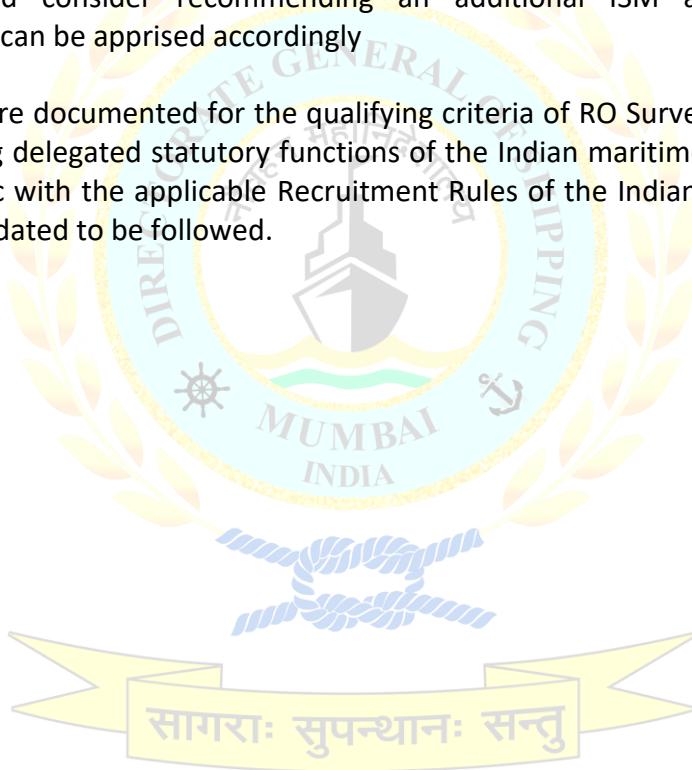
- 77% of detentions occurred within 6 months of Class and statutory surveys, raising concerns about the quality and thoroughness of statutory surveys conducted. Survey quality to be focussed upon by the RO's.

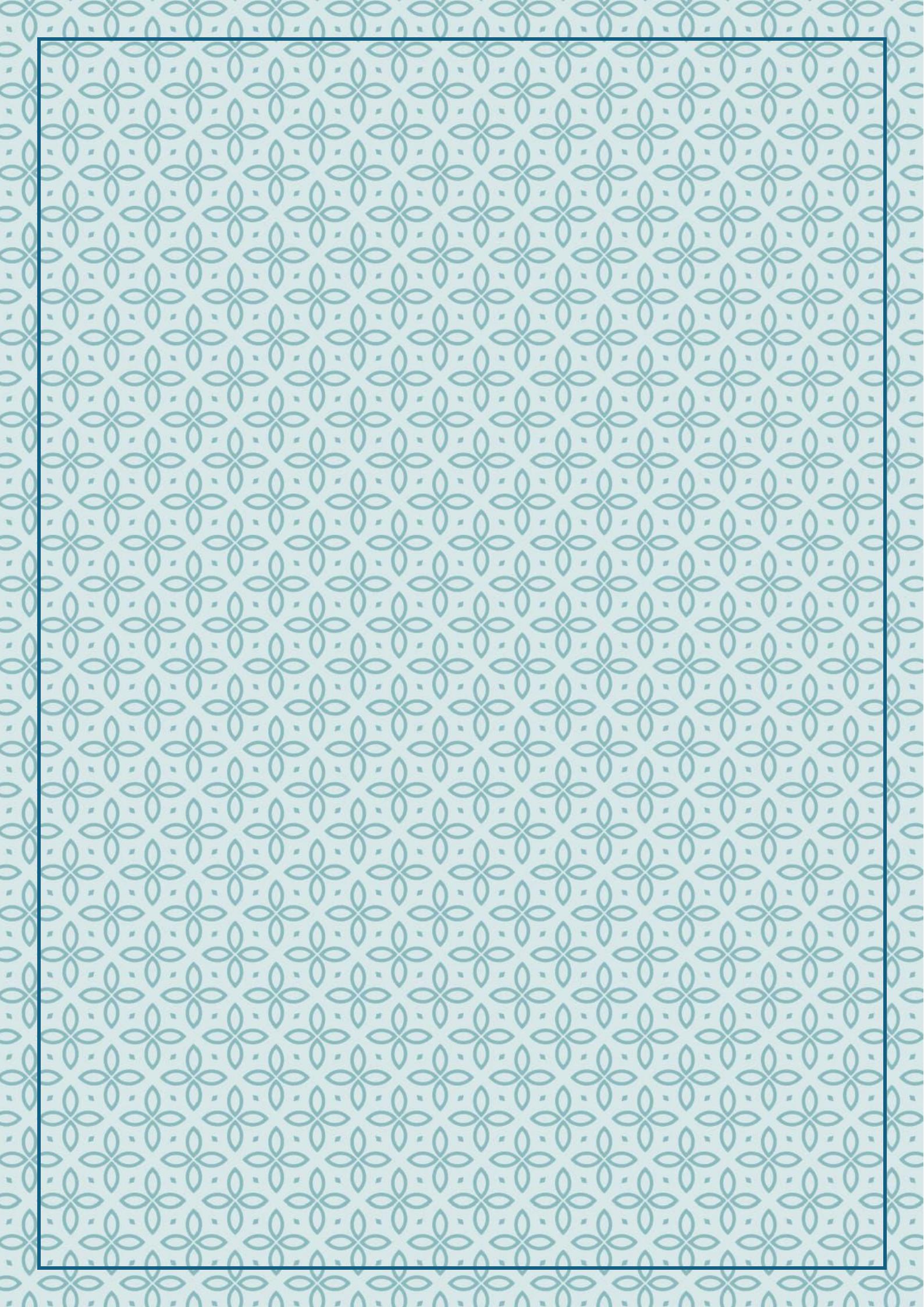
**2. Advisory on Modifications Affecting Certificates:** It was recommended to RO's that any alterations or modifications pertaining to statutory certificates issued to a vessel by other Recognized Organizations (ROs) may impact the vessel's class or statutory certificates issued by IRS. Such changes are required to be holistically considered to ensure continued compliance.

**3. Search and Rescue Plan Compliance:** Vessels not provided with an approved Search and Rescue Plan as required by DGS Order 20 of 2022 have been identified. Appropriate measures must be taken to ensure the timely submission and approval of such plans.

**4. Advisory on ISM Audit Findings:** It is recommended that where multiple findings related to statutory requirements are recorded during ISM audits, even if closed during the audit, they may indicate a safety management system failure. In such cases, auditors should consider recommending an additional ISM audit. The Flag Administration can be apprised accordingly.

5. The procedure documented for the qualifying criteria of RO Surveyors designated for undertaking delegated statutory functions of the Indian maritime administration was not in sync with the applicable Recruitment Rules of the Indian administration. Same was mandated to be followed.





# Chapter VI: Statistical Analysis of the Data and Trend Analysis

## Condition of Class Imposed

A review of statistics of the Condition of Class imposed at completion of Annual/Intermediate/Renewal Surveys in last two years and the observations are:

- 2024 sees a shift of CoC Imposed cases toward mid-range GT categories (0–500, 3000–5000, >50,000) rather than large mid-high ranges like 10,000–50,000 GT.
- The spike in **3000–5000 GT** in 2024 suggests a new operational or compliance challenge in this segment
- Oil tanker, Container, Dredger, General cargo ship vessel types collectively account for roughly **60–70%** of all Conditions of Class in 2024, indicating that operational issues are heavily concentrated here. From 2023 to 2024, the total number of cases jumped sharply (30 → 114), more than tripling. Large increases occurred for **Oil Tanker, Dredger, Container, and General Cargo**.

## Condition of Class imposed during Intermediate and Renewal Surveys:

- 2024 reversed the trend dramatically with **record-high CoC counts** in all categories.
- Machinery CoCs increased more sharply (in % terms) than Hull CoCs, but Hull CoCs remain slightly higher in absolute numbers.
- Almost 70% of all CoCs are imposed during Annual Surveys indicating poor maintenance regime on ships and almost 20% imposed during intermediate and renewal surveys. Renewal & Intermediate surveys being major surveys involving docking indicates poor preparation for these surveys by shipping companies.
- In 2024, Hull and Machinery CoCs are **almost evenly split**.
- **Hull CoCs** are slightly higher, making up just over half of all CoCs imposed during Intermediate & Renewal Surveys.
- This balance suggests **both structural and mechanical issues** are driving the large 2024 spike — not just one category.
- **Main 2024 surge** comes from **3000–5000 GT ships** (21 cases) and **>50,000 GT ships** (6 cases), plus the overall jump in **Total CoC**.
- Smaller ships (0–3000 GT) remain steady, mid-size ships (5000–10,000 GT and 10,000–50,000 GT) declined.
- The shift toward more **mid-small and very large vessels** in 2024 suggests targeted inspection patterns or emerging compliance issues in those size categories.
- **2023** saw a general decline in conditions of class across all age groups — possibly due to fewer inspections, fleet retirements, or underreporting.

- 2024 shows a sharp increase in conditions across all age categories, especially in the 15–25 year segment, which now poses the highest

## Flag State Detentions

A review of statistics of the Flag State Detentions in last two years and the observations are:

- Only 24% of ships detained were under 500 GT, hence not subject to ISM Code.
- A significant 76% were 500 GT and above, indicating most 2024 detentions relate to ships requiring ISM Code compliance.
- This differs from prior years (2022–2023) where ships <500 GT formed 40–58% of detentions.
- Most detentions occurred in the 15–25 year age group (13 ships), though fewer than in 2023 (23).
- 5–15 year ships saw a slight increase to 7 (from 6 in 2023).
- Detentions of older ships (>25 years) dropped sharply to 4, continuing a 3-year decline.
- Newer ships (0–5 years) continue to pose low detention risk — only 1 detention in 2024.
- 90% of the ships detained under FSI of less than 500 GT are above 15 years of age and these ships are inspected every year and there is no need to enhance the frequency between two inspections considering the high detention rate.
- Tugs are consistently the most detained ship type under 500 GT across all years.
- Crew Boat/Utility vessels saw a spike in 2023 but completely disappeared from 2024 detentions.
- Offshore vessels showed minor presence in 2023 only.
- In 2024, **all detentions under 500 GT were of Tugboats**, indicating a focused risk or compliance issue in this segment. The complete absence of detention in the **Crew Boat** and **Offshore** categories marks a **significant improvement** or reduced operational presence in those segments.

## Port State Detentions

A review of statistics of the Port State Detentions in last two years and the observations are:

- i. There was 1 PSC detention in 2022 and 9 detentions in 2023. The detention in 2022 was in TOKYO MoU while that in 2023 indicates 7 detentions in TOKYO MOU and 1 each in Paris and MED-MOU.
- ii. Except 1 vessel detained in 2023 which was age above 15-years, all other vessels were between 10-15 years of age and in this category 1 FSI is conducted every two-years.
- iii. The Companies with PSC detentions are:
  - 4-Vessels managed by Shipping Corporation of India detained in 2023.

- 3-Vessels of GESCO detained in 2023.
- 1 Vessel of TW Ship Management was detained in 2022 and also 1 in 2023.
- 1 Vessel managed by Arka Global Marine Services LLP was detained in 2022.

iv. Out of 10 vessels detained in 2022 and 2023, there were 6 Bulk Carriers and 4 Oil Tankers.

## Casualty

A review of statistics of the Casualty in last two years and the observations are:

1. Fire/Explosion Dominates – 50% (6 of 12) of all casualties in 2024 were due to fire and explosion, followed by grounding and flooding at 25% each (3 incidents each).
2. Loss of Life Recorded – 2 fatalities occurred in 2024, both linked to fire/explosion incidents.
3. Bulk Carriers Most Affected – Bulk carriers alone accounted for 42% of incidents, primarily grounding (2) and fire/explosion (3).
4. 91.7% of casualties involved ships over 10 years old.
5. Ships in the 15–20 year bracket had the highest number of incidents, suggesting a strong correlation between age and casualty occurrence.

## ISM DOC and SMC Audits

A review of statistics of the ISM DOC & SMC Audits in last three years and two years are:

- 1) Nil Findings DOC/SMC Audits:**
  - i. In 2024, around 35% of all DOC audits reported nil findings, whereas SMC audits had only 5–6% nil findings.
  - ii. SMC Initial/Intermediate/Renewal Audits which were carried out in 2024, only 3–5% had nil findings whereas DOC Initial/Annual/Renewal Audits without findings ranged between 20–30%.
  - iii. Nil finding rates by DOC type in 2024:
    - Initial: 5–29%
    - Annual: 4–5%
    - Renewal: ~18%
  - iv. Average findings per DOC audit were highest in Annual Audits (2.13) and Renewal Audits (1.82).
- 2) Average Findings & Nature of Findings**
  - i. There were 1.3–1.8 findings per DOC Audit in 2023–2024, while there were 1.7–2.1 findings per SMS Audit conducted in 2023–2024.

- ii. DOC Audits: More than 24% of findings were noted to be Clause 10 (Maintenance of the Ship and Equipment), while between 17-19% of all findings were noted to be in each of the clauses: 1 (Objectives and Functional Requirements of the ISM Code), 11 (Documentation) and 12 (Company Verification, Review and Evaluation).
- iii. SMC Audits (2023-2024): About 32% of all findings are found to be in Clause 10, while 15-20% of all findings are noted to be in Clause 11 (Documentation). About 10% of all findings in each year are noted to be in each of the Clauses 7 (Shipboard operations) and 8 (Emergency Preparedness).
- iv. Other Cargo ships DOC Companies with an average of 1.4 to 1.6 findings per audit are having more findings per audit compared to other ship types. The Passenger HSC operating companies are also noted to be issued on an average 1.2 to 1.5 findings per Audit.

### **3) Interim Audits and Nature of Findings**

- i. Conversion of DOC Interim Audit to Initial Audit: An Initial DOC Audit is an indication that the Company acquiring a DOC for a new ship type has taken for management that particular ship type and operated it for at least 3 Months. An Interim Document of Compliance should be issued for a period not exceeding 12 months. The mismatch between number of interim audits. Interim audits and Initial Audit is an indication that the new established Company or existing company is unable to acquire that ship type under its management.
- ii. As seen from Interim SMC Audits, about of ships entering in Indian Flag are 22% Oil Tanker, 13% Bulk Carrier and maximum 37% are other cargo ships.
- iii. On an average about 20% of all Interim DOC Audits are with findings while about 100% of all Interim SMC Audits in 2024 are with findings.
- iv. i Most of the findings in Interim DOC Audits are related to ISM Clauses 1.2.3 (Objectives), 7 (Shipboard Operations), 10 (Maintenance of the Ship and Equipment) & 11(Documentation).
- v. Most of the findings in Interim SMC Audits related to ISM Clauses 3, 6, 7,10 & 11

### **4) Initial/Annual/Renewal DOC Audits**

- i. During Initial DOC Audits average findings per Audit is about 1.2 to 1.4, and this figure rises to 1.3-2 during annual and renewal audits.
- ii. More than 50% of all findings are on Other Cargo Ships. This is because the number of Other Cargo Ships in Indian Flag are more than twice the other types. I
- iii. However, when considering Average findings per audits it is found that among all ship types except passenger ships, the average findings per

audit is that for other cargo ships in the range of 1.8- 2.13.

**5) Initial/Intermediate/Renewal SMC Audits**

- i. There are about 1.8 findings per audit on an average during SMC Initial/Intermediate/Renewal Audits.
- ii. During Initial SMC Audits the average number of findings per audit is 1.5 and during renewal, it is about 1.8.
- iii. The other cargo ships and Chemical Tankers are noted to have average findings per SMC Audit of more than 2.

**6) Performance of Bulk Carriers DOC Companies and Bulk Carrier Ships during Ship Audits**

- i. Bulk Carriers DOC Companies have an average audit finding of 1-2.08 per audit in last two years.
- ii. The average findings per SMC Audit is noted to be around 1.0-1.2
- iii. The maximum findings during DOC Audits were noted to be in Clause 10 of the ISM Code, while that during SMC noted to be in Clause 8.

**7) Performance of Other Cargo Ships DOC Companies and Other Cargo Ships during Ship Audits**

- i. The average findings per DOC (Initial/Annual/Renewal) noted to be in the range of 1.9 to 2.2 in last two years, while that in SMC Audits (Initial, Intermediate, Renewal) noted to be range of 2 to 2.13.
- ii. 20% of average findings during DOC Audits and SMC noted to be under ISM Clause 10.
- iii. Multiple companies had ≥3 findings in at least 1 audit in the past 3 years (e.g., Columbia Aurus, Seamac).

**8) Performance of Oil Tanker Ships DOC Companies and Oil Tankers Ships during Ship Audits**

- i. There were 8 Oil tankers Companies which underwent DOC Audits in between 2023-2024.
- ii. The average findings per DOC audit ranged from 1.6 to 2 in between 2023-2024.
- iii. The average findings per SMC Audit in 2024 was 0.77

**9) Performance of Passenger HSC and Passenger Ship DOC Companies**

- i. Primarily LDCL and SIC are managing Passenger vessels.

**10) Performance of Chemical Tanker Ships DOC Companies and Chemical Tankers Ships during Ship Audits**

- i. Based on DOC Audits, there are 5 Companies Chemical tankers.
- ii. There have been on an average 1 non-conformities issued per ships in 2024.

- iii. On average there have been 1 non-conformity issued to ships audited in 2024

### **11) Performance of Gas Carriers Ships DOC Companies and Gas Carriers Ships during Ship Audits**

- i. Based on DOC Audits, there are 8 Companies managing gas carriers. The average number of non-conformities issued per DOC Audit in between 2024 were 0.5 to 1.0

### **12) Additional DOC Audits**

- i. There were 19 additional DOC Audits conducted between 2024
- ii. Out of these b) Out of these 9, about 6 were due to change of address, 1 was for Name change and remaining were related to additional audits at last audit, PSC/FSI detentions etc.

### **13) Analysis of Compliance to Maritime Labor Convention**

- 1. In last 1-Year on an average 330-400 MLC inspections are conducted every year. Nearly 1/3<sup>rd</sup> of these inspections are initial inspections and about 40% renewal inspections. 25% to 30% of all inspections are on other cargo ships.
- 2. The percentage of inspections without any deficiencies has shown a slight decrease with 84% in 2023 to about 81.5% in 2024 indicating a slight decrease in compliance by ships. The Nil deficiency ratio (Number of Inspections without deficiencies ÷ Total Number of Inspections) is around 0.60 ; Higher this index, means more and more ships are found 100% compliant with MLC), there is also a reduction in deficiency ratio (Total Number of Deficiencies ÷ Total Number of Inspections; Higher this index, more are the number of deficiencies per ships) from 0.23 in 2023 to 0.31 in 2024 indicating a slight dip in compliance.
- 3. In both the areas, that is, Seafarer Employment Agreement and Accommodation and Recreational Facilities, the deficiencies have ranged from 20-40% in last Year for each of these areas and thus constitute the areas of concern.
- 4. Non-payment of wages also ranges from 10% of all deficiencies last year. However, it is noted that deficiencies are replication of Regulations and does not reflect the areas of concern and the wages issues considering the number of complaints is either not identified or not identified properly on paper and require to be re-addressed in future inspections. Majority of deficiencies related to wages and SEA are found on other cargo ships such as Multipurpose OSV, Offshore support vessel, OSV, MSV.
- 5. 90% of General Cargo ships and Container vessels in the year 2024 have demonstrated nil deficiencies in more than 80% of all inspections.

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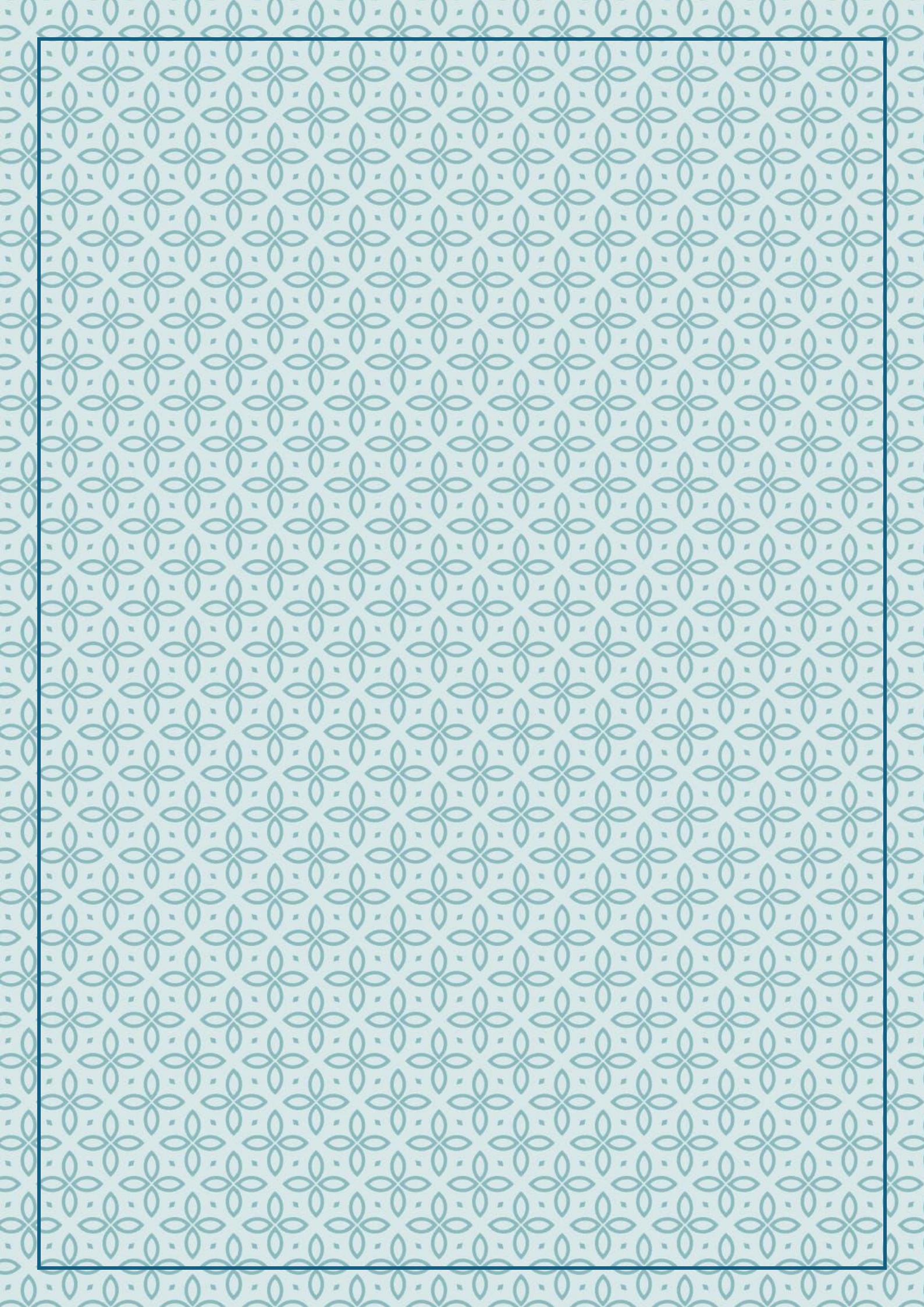
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10. 90% of General Cargo ships and Container vessels in the year 2024 have demonstrated nil deficiencies in more than 80% of all inspections.

- i. No. of the ships in any age grouping is noted to have an average deficiency index of more than 0.2 for the year 2024. However, year to year variation in average deficiency index is indicative of variation in maintenance of ships within each age group and thus no inference can be drawn.
- ii. The **Oil Tankers** performed well with 81% of total inspections resulting in Nil deficiency. The major areas requiring attention are seafarer agreement, accommodation and wage payment.
- iii. The performance of **Chemical Tankers** since 2023 has improved and is present nearer to performance of average Indian ships inspected. The main areas of concern are SEA related deviation.
- iv. The **Other Cargo Ships (AHTS, AHTS/Supply, AHTS/Tug, Offshore Support, Supply, Multi-Purpose Supply, and Diving Support)** have performed below the average performance of all ships with nil deficiency index of about 0.8 compared to same being about 0.85 for

all Indian ships, that is, below the average of all Indian ships and also with a higher number of deficiencies per ship than that for an average Indian ship, that is about 0.4 to 0.5. The main areas requiring attention are Seafarer wages, Seafarer employment agreement and accommodation and recreational facilities.

- v. The performance of **Gas Carriers** are much above the average Ship inspected in each of last 3-Years with hardly any areas of concern.
- vi. The performance of Other Cargo (Buoy, Floating Crane, Lighthouse Vessel, Patrol Boat, Pilot, survey Launch, Trailing suction Barge, Research Vessel, Oil Barge) are much above the average Ship inspected in each of last 3-Years with hardly any areas of concern.
- vii. Considering the small size of **Other Cargo ships (Crew Boat, Utility Vessel, Work Boat)**, the performance of these ships are outstanding Indian ship inspected in 2024.
- viii. Considering the complex nature of Dredgers, the performance of these ships are nearer to the average Indian ship inspected in the year 2024 with 3 deficiencies.
- ix. The average performance of **Container Ship** is higher than that of average Indian ship with nil deficiency ratio of 0.9 as compared to 0.85 of average Indian ship and the deficiency ratio is in range of 0.1 and is above that of average Indian ship. The main areas requiring attention are: Accommodation recreation facilities, food and catering.
- x. The **General Cargo Ships** have performed better than the average performance of all ships with nil deficiency index above the average and also with reduced number of deficiencies per ship. The main areas requiring attention are: Accommodation and recreational facilities.
- xi. The **Cement Carrier Ships** have performed nearly same as average Indian ship in 2024.
- xii. Tugs have performed fairly better considering that these vessels constitute almost 40% of all Indian ships in numbers, this is a huge concern. The other concerns are related to Accommodation and recreational facilities, Seafarers' employment agreements and Health and safety protection and accident prevention.





सत्यमेव जयते

**Ministry of Ports,  
Shipping & Waterways**  
Government of India

