

DON'T CURE PREVENT

ISSUE 27 JUNE 2025



MODIFICATIONS TO THE VESSEL'S PIPING SYSTEM



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CASE

During a recent **Engineering Audit** onboard, the PAS Auditor observed some modifications to the vessel's piping system. When the PAS Auditor requested to review the relevant piping drawings, it was found that subject modifications had not been documented and approved by the Classification Society.



REGULATORY FRAMEWORK

IMO ISM Code 10.1

The Company should establish procedures to ensure that the vessel remains in full compliance with applicable rules and regulations and with any additional requirements set by the Company.

IACS - Information Paper. Classification societies – what, why and how?

Section B1 – The effectiveness of classification depends upon the shipbuilder, during construction, and the shipowner, once the vessel enters service, cooperating with the Class Society in an open and transparent manner on all issues which may affect its class status.

TMSA Element 7.1.1

Documented procedure for management of change addresses both permanent and temporary changes onboard and ashore. These may include modification of existing equipment.

SIRE 2.0 – Question 2.5.1

Objective: To ensure that any change made to the vessel structure, machinery or equipment is properly managed to avoid any undesirable outcome.

DryBMS – Subject area No. 26

There is a MOC procedure which covers changes to personnel, systems, processes, equipment, products, materials, procedures and vessels.



WHAT WENT WRONG?

- ✗ The modifications observed onboard were not reflected in the piping drawings.
- ✗ No evidence of approval from either the Classification Society or the Flag Administration was available for these modifications.
- ✗ The modifications were implemented without a documented risk assessment.
- ✗ Management of Change (MoC) process was not followed, in accordance with the Company's established procedures.



OUR SUGGESTION

- 🕒 **Review and revise the Safety Management System (SMS)** to ensure that all modifications to the vessel's structure, machinery, or equipment are subject to a documented Management of Change (MoC) procedure.
- 🕒 **Integrate Risk Assessment as a mandatory step** in the initiation of every MoC, aiming to evaluate the potential impact of each modification on safety, operational and regulatory compliance.
- 🕒 **Ensure that any proposed changes or modifications** to the vessel's equipment are reviewed by the Head Office and subsequently submitted to the Classification Society for approval, in accordance with applicable requirements.
- 🕒 **Update all affected vessel drawings** promptly following the completion of any modification.



BEST PRACTICE

- ✅ **Maintain a comprehensive Management of Change (MoC) register**, ensuring proper retention of all supporting documentation both onboard and ashore.
- ✅ **Declare any modifications carried out within the past 12 months** in the vessel's Pre-Inspection Questionnaire, item 2.5. (This requirement specifically applies to tankers, gas carriers, and chemical carriers subject to the SIRE 2.0 inspection regime).
- ✅ **Incorporate detailed inspection of engine room piping** and verification of any potentially unapproved modifications into the internal superintendent's inspection checklist.
- ✅ **Promote awareness and understanding of the MoC process** and emphasize strict adherence during all onboard attendances and pre-joining briefings, especially in relation to modifications of the vessel's equipment and systems.

 **PREVENTION AT SEA**

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FOR MORE INFORMATION,
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