

## Improper implementation of manufacturers' service letters

### Background

Over the years Gard has seen a number of claims that could have been avoided if instructions and recommendations in manufacturers' service letters had been properly implemented in a ship's on board Planned Maintenance System (PMS). In some of the cases it appears that shipowners' and operators' shore organisations have not distributed the service letters to all the ships in their fleet. In other cases we find that the letters have been forwarded to all ships but since accompanying instructions on implementation and follow up are missing, the required changes have not been implemented on board.



Failure to implement changes and recommendations introduced in manufacturers' service letters may in some cases have serious consequences for the safety of the crew, the environment and the ship. The purpose of this circular is therefore to remind shipowners and operators of the importance of establishing clear company procedures where all service letters are reviewed and relevant changes and actions are entered in the company's planned maintenance system for the applicable ships. Failure to implement manufacturers' instructions and recommendations may also prejudice the insurance cover. Consequently, it is important to control the implementation of such changes and recommendations through the ships safety management system (SMS).

### Gard's experience

In one of Gard's recent cases the cause of engine damage was found to be improper tightening of connecting rod bolts. During the incident investigation it was established that the engine manufacturers' required retightening check after 200 hours of operation had not been carried out by the crew since this instruction, distributed in a service letter, had not been implemented in the ship's own PMS. The investigation concluded that the retightening of the bolts would most likely have prevented the engine breakdown. In another recent case the auxiliary engine suffered a piston fatigue breakdown only 120 running hours after a routine overhaul. Also in this case the investigation revealed that the ship's Technical Manager/ Shipowners had not updated the PMS to include a set of instructions and procedures issued in a service letter from the manufacturers, a letter which was issued and distributed at least one year before the incident occurred. The repair costs in this case exceeded USD 130,000.

Both of the above cases demonstrate the importance of the Technical Managers/Shipowners having proper procedures in place to timely implement manufacturers' service letters and instructions onboard.

### Regulatory requirements and implementation

The IMO ISM Code states that "*development, implementation and maintenance of all instructions and procedures to ensure safe operation of the ship and protection of the environment in compliance with relevant international and Flag state legislation shall be a part of the ship's safety management system (SMS)*" (ISM Code Section 1.4). Furthermore, it states that the shipowner is responsible for "*establishing procedures to ensure that the ship is maintained in conformity of the provisions of the relevant rules and regulations and with any additional requirements which may be established by the company*" (ISM Code Section 10).

### Recommendations

- Gard recommends the Technical Managers/Shipowners establish firm internal procedures in the company's Quality Management System (QMS) to ensure that all applicable manufacturers' service letters and instructions are reviewed and implemented in the ships PMS. Applicable manufacturers' service letters and instructions, including managers' recommendations, should also form part of the handover notes between the on board senior management.
- In case there is a change of ship's Technical management/Shipowner, always contact the manufacturers to ensure that the ship's PMS is up to date with the latest changes and recommendations.

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