

Company Circular no. 05 - 2026

MONTHLY SAFETY CAMPAIGNS - MAY 2026

Dear Captain/CE

Please note as following for your compliance and discussion with all officers and crew members. Lessons Learned to be discussed during the monthly Safety Meeting.

1. ClassNK PSC Bulletins – NK-PSC-24

Oil filtering equipment does not comply with AMSA Marine Notice 2024/03 "Considerations during testing."

Attached ClassNK PSC bulletin PSC-24 and AMSA Marine Notice 2024/03. Check your OWS arrangement about flow sensor and valve on sampling line for 15ppm bilge alarm. Right Ship inspector is also expected to carry out the test in accordance with AMSA Marine Notice 2024/03, **refer RISQ 5.15**. RightShip's view aligns with AMSA's interpretation that the failure of the 15ppm bilge alarm to activate the automatic stopping device, in the absence of a representative sample of the effluent, constitutes noncompliance with Resolution MEPC.107(49). Please ensure vessel is in compliance with ClassNK PSC bulletin PSC-24 and RISQ 5.15.

Inspector may conduct the following operational tests of the oily water separator:

1. The equipment should be configured to circulate liquid from bilge tank to bilge tank (recirculating facility) and provide an effluent sample to the 15ppm bilge alarm, simulating the discharge of 15ppm bilge separator effluent overboard. When a simulation of an effluent sample greater than 15ppm is applied, the inspector shall witness that the alarm is activated, and that the automatic stopping device (3-way valve) stops effluent discharge overboard.
2. If a sampling valve is provided and is not sealed by Class, the inspector shall request the accompanying engineer officer to close the sample valve, thereby interrupting the effluent flow to the 15ppm bilge alarm. The 15ppm bilge alarm must activate within 5 seconds of the effluent sample flow being stopped, and the automatic stopping device must activate within 20 seconds. If not, this is considered a failure of the oily discharge monitoring and control system and the 15ppm alarm arrangements.

The inspector may require OWS operational test on circulation mode. All engineers to familiarize with this test procedure.

- Operational testing of oil filtering equipment will require the equipment to be configured to circulate liquid from bilge tank to bilge tank (recirculating facility) and provide an effluent sample to the 15ppm bilge alarm – simulating the discharge of 15ppm bilge separator effluent overboard. When a simulation of effluent sample greater than 15ppm is applied, the inspector shall confirm that the alarm is activated, and that the automatic stopping device (3-way valve) stops effluent discharge overboard. This indicates compliant operation of the system.

Please contact your Ship Manager for any clarification and assistance.

2. Hull Contact Damage Incident

Attached please find incident report pertaining to the hull damage on our vessel caused by lightering barge departure during squally weather called Nor'wester.

Please discuss following Lessons Learned with all staff to avoid recurrence.

Lessons Learned

- Establish stricter weather criteria for lightering operations (e.g., suspend operations above Beaufort 6)
- Closely monitor weather condition, inform concerned parties immediately if bad weather/strong wind occur to suspend the operation. The the Kalbaishakhi (or Nor'wester) in the eastern and northeastern parts of India and Bangladesh can strike suddenly and at night in March to May. Observe following:
 - Continuously monitor meteorological forecasts and local warnings. Check with port control/agent about port warning and advisory.

- Keep extra lookouts in Nor'westers season for lightening, heavy rain, low bank dark cloud
- Keep engine ready at short notice for immediate use
- Double-check mooring lines, anchor chains as applicable
- Maintain adequate ballast to improve stability and reduce windage.
- Limit crew movement on deck during storm onset to avoid injury
- Implement a dynamic risk assessment for ship-to-ship operations, factoring adverse weather and equipment failure.
- Improve coordination protocols between Mother Vessel and Barge Masters during lightering.

3. Immediate action taken by our vessel to avoid cargo contamination issue at disport

Our vessel was loading the cargo of Salt in Dampier, Australia. Crew noticed the salt of abnormal colour being loaded at completion stage in cargo hold No. 2. Master took immediate action and notified to all concerned parties about abnormal colour and some contamination to salt cargo with evidence of photos. Master issued Note of Protest about the abnormal colour and contamination to the cargo.



Above immediate action by Master keeps us better prepared in case of any cargo contamination claim at disport. Please watch for any cargo contamination at load port and take photos of the cargo as evidence.

4. GARD - Flighted spongy moth complex (FSMC) - Do not let a moth hold up your vessel

Attached please find GARD bulletin on FSMC, in 2025, numerous vessels arriving in Canada and the United States were found carrying flighted spongy moth complex egg masses, and some were so heavily infested that they were denied port entry. With populations in the moth's native Asian region potentially reaching outbreak levels again in 2026, strict pre-departure inspection and certification at affected regional ports are essential.

FSMC populations are established in some port areas of Northern China, Korea, Japan, and the Russian Far East. Countries known to carry out seasonal FSMC inspections are Canada, the United States (US), Chile, New Zealand, Argentina, and Australia. Refer Table for the key FSMC requirements for each relevant country provided in the bulletin.

In summary, **in addition to obtaining pre-departure certification**, vessel crews should:

- Carry out thorough visual inspections of all accessible areas of the superstructure, decks, holds, cargo, and cargo gear. Use binoculars to check hard-to-reach areas. Egg masses are often deposited in sheltered locations, crevices or cavities, under tarps, behind doors, around light fixtures, and underneath cargo hold rims. Remember that female FSMCs are attracted to light and that egg masses may be deposited on surfaces exposed to night lighting.
- Scrape off any egg masses found and destroy them in alcohol, boiling water or by incineration. Do not paint over egg masses or drop them into the sea, as this will not kill the eggs or larvae.

- Record all inspections and removals in the vessel's deck logbook, including details FSMC egg mass disposal methods.

5. HSE Shares for awareness and good practice sharing (RioTinto)

RTM_2026_006 : Hand & Finger Injuries – Safe Working Practices

Hand and finger injuries remain among the most common personal injury types across the maritime industry, particularly during routine maintenance and workshop activities. Discuss attached Rio Tinto Notification which includes GRIP approach.

Key Points:

- Hand and finger injuries often occur during routine, familiar tasks, rather than high-energy or abnormal operations.
- Line-of-fire exposure can exist even when tasks appear controlled and conditions are stable.
- Manual tasks involving impact, torque, or leverage present inherent risks when hand placement is not actively managed.
- PPE provides protection but does not, on its own, eliminate line-of-fire and pinch-point hazards.

Causal Factors / Root Causes:

- Hands positioned within the line of fire during impact, tightening or cutting activities.
- Stabilisation of tools or components by hand during force-applied tasks.
- Task familiarity leading to reduced perception of risk during routine maintenance activities.
- Insufficient consideration of hand placement as part of task setup and execution..

Prevention:

- Use engineered hand-protection aids (e.g. finger savers, thumb-saver chisel and punch holders, clamps, vices) to maintain separation between hands and impact or pinch points.
- Avoid stabilising tools or components by hand where purpose-designed holding or securing devices are available.
- Ensure toolbox talks cover correct tool selection and explain when hand-protection tools apply.
- Promote crew familiarisation with the range of injury-prevention tools available onboard, including understanding their purpose, availability, and appropriate application.
- Collision-avoidance actions must be taken early, wide, and clear.
- Voyage plans should avoid fishing hotspots and use the China Coastal Main Public Routes where possible.
- All navigation equipment must remain fully operational, and Masters and OOWs should study the China coastal collision-prevention guidelines and safety notice.

6. OJT on Cyber Security

Please familiarize crew on cyber security using the attached OJT 068 on Cyber Security by 31st May 2026 and file the signed OJT 068 in Share Point folder 3.2.3.

7. KARCO TRAINING

The ship staff shall conduct the following training modules this month:

- **Ten Sure Ways To Hurt Your Hands And Arms - VOL 1**
- **Bilge Water Management (Including Ship Specific OWS)**
- **Shallow Water Effects**

The duration of each title is only about 10-15 minutes.

Training must be carried out in two sessions (based on work/rest hours) to ensure all crew are able to attend. Each session must be opened and concluded by a Senior Officer.

After the training, the Senior Officer should have an interactive session with the crew, discuss questions and the crew can also share their experience (Reflective learning). Once the training is completed, each crew member shall log on individually and an assessment must be completed, and the records must be exported to KARCO system.

The Master can contact IT department and support team (support@karcoservices.com) for any queries regarding KARCO. Records of training to be maintained in form 3.2.3 filed in Share Point.

8. RIGHTSHIP – RISQ Frequently Raised and High-Risk Findings

Attached RISQ Frequently Raised and High-Risk Findings. Please check again the items which are not in compliance by 31st May 2026.

Master/CE to ensure that each section is checked diligently by respective officers in charge and corrective/preventive action is taken to the deficiencies identified.