Report of the 2023 Concentrated Inspection Campaign (CIC)

on Fire Safety



CIC on Fire Safety 2023

Standard format evaluation report of a CIC

Executive Summary

The Memorandum of Understanding on Port State Control (PSC) in the Asia-Pacific region (Tokyo MOU) carried out a Concentrated Inspection Campaign (CIC) on Fire Safety in collaboration with the Paris MoU from 1 September to 30 November 2023. During the CIC, member Authorities focused on compliance with areas specified by the CIC during PSC inspections. This report documents the results of the campaign for the member Authorities of the Tokyo MOU.

A Concentrated Inspection Campaign (CIC) on Fire Safety was conducted in views of an annual recurrence of a high number of deficiencies related to fire safety and fire safety being consistently in the top three detainable deficiency categories across all regions.

A CIC questionnaire was devised and approved by the Tokyo MOU Port State Control Committee. The intention of the questionnaire was to provide a supplementary series of questions to the regular inspection process to specifically address areas where there are reoccurring deficiencies with respect to fire safety. The questions provided additional guidance to Port State Control Officers (PSCO) to help:

- determine if ships meet the mandatory requirements for fire safety prescribed in the International Convention for the Safety of Life at Sea (SOLAS) and the International Code for Fire Safety Systems (FSS Code); and
- foster consistent and harmonized inspection and implementation of the requirements by all PSCOs.

The objective of the CIC was to verify the level of compliance and create awareness with the requirements of Fire Safety. Fire Safety is one of the key areas to be checked for PSC inspections. During the CIC, a total of 7190 inspections were carried out with the questionnaire. The CIC-topic detention rate in the period was 1.22% (88 ships were detained).

Of the CIC related deficiencies marked as grounds for detention, the highest number, by flag State, was Panama (163), Liberia (110), Belize (47) and Sierra Leone (46).

Of the Tokyo MOU member Authorities, China reported the highest number of CIC related deficiencies (1483) followed by Japan (498) and Republic of Korea (153). China had the highest number of CIC topic related deficiencies recorded as grounds for detention (368). It is important to note however that these numbers are not proportional to the number of inspections done by the members.

The report concludes that the results of the CIC indicate that the industry has achieved a

good level of compliance with the specific provisions inspected during the CIC of Fire Safety. However, this should be considered in the context that the industry was informed well in advance of the intention to carry out CIC in this area.

It is recommended that industry collaborates with crews and flag States to enhance awareness regarding the CIC topics of the recent CIC, with particular attention brought to the requirements that raised the most concern in the CIC relating to fire doors and fire drills (crew performance).

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Introduction

1.1 Purpose of this Report

The purpose of this report is to present the results of the CIC on Fire Safety Systems.

1.2 Objective of the CIC

The purpose of the campaign on fire safety systems in general was to determine that ships are meeting the mandatory requirements for fire safety prescribed in the:

- a) Safety of Life at Sea (SOLAS) convention, Chapter II-2 (as related to the CIC); and
- b) Fire Safety Systems Code (FSS).

1.3 Scope of the CIC

The CIC applied to all ships targeted for inspection within the Tokyo MOU Region between 1 September to 30 November 2023.

The CIC was designed to offer additional focus on areas where a number of detainable deficiencies remain high as it relates to fire safety and not intended to detract from the normal coverage of PSC inspections. It was conducted in conjunction with the regular PSC targeting and inspection activities.

1.4 General Remarks

- 1. For the purpose of this report, a detention is an inspection containing at least one deficiency that is considered a ground for detention.
- 2. The tables do not take into account inspections where the CIC questionnaire was not recorded, with exception of table 2.
- PSCOs were advised that a "No" answer in the questionnaire should not automatically lead to detention of the ship. In this case, the PSCO was encouraged to use his/her professional judgement to determine whether the ship should be considered for detention.

Summary, Conclusions and Recommendations

2.1 Summary

The highest compliance was observed in relation to Question 5, relating to whether the means of control for power ventilation of machinery spaces are operable from two grouped positions, where 99.69% responded 'yes'. The second highest compliance was relating to Question 6 on whether each fire pump can deliver at least the two required jets of water, 99.45% responded 'yes'. Notably, when comparing Questions 5 and 6 even though compliance was high for Question 6 it resulted in 9 detentions compared with 3 detentions for question 5.

- With the exception of Question 2– Fire Doors and Question 10 Fire Drill there was an overall high compliance rate averaging 98.41%.
- Question 10 Fire Drills had the lowest rate of compliance at 91.56%, just 2.97% less than Question 2 – Fire Doors. Notably, however, Question 10 on Fire Drills had highest number of detentions at 43.
- The lowest compliance was noted with respect to Question 10, which related to witnessing and level of satisfaction of a fire drill. On this question 8.44% responded 'no'. Notably, Question 10 also had the highest "n/a" response at 38.53%, it is assumed this could be due to fact that operational drills are not required for an initial inspection, despite advising that the drill should be done on all inspections.
- As it relates to other areas of low compliance, Question 2 followed closely with 6.47% responding 'no' with respect to whether fire doors are maintained in good working condition.
- > The overall detention rate based on total CIC inspections was 1.22%.
- 364 vessels with deficiencies marked as grounds for detention were in the High Risk category.
- By ship type, there was a change in the top ship type from previous years having the highest CIC-topic detention rate with bulk carrier (38.6%) followed by General cargo/multipurpose ships (32.2%) which was highest in 2022. The results also highlighted a change in third place from 2022 from oil tanker to containership (9.9%).
- Similar to previous CICs, ship age <6 years had 0% detention rate for CIC-topic detentions, while the highest rate was for ships 13-18 years (39.5%).</p>
- The flag State with highest number of CIC related deficiencies was Panama (898) followed by Liberia (372), Marshall Islands (213) and Hong Kong, China (208).
- Ships with CIC related deficiencies marked as grounds for detention, the highest number, by flag State, was Panama (163), Liberia (110), Belize (47) and Sierra Leone (46).
- The flag States which had CIC topic detentions were a mix of White, Grey, Black and not listed in the Tokyo MOU WGB list therefore no trend could be discerned.

2.2 Conclusions

The results show that there is generally a good level of compliance, however this should be considered in the context that the shipping industry were informed well in advance of the intention to carry out a CIC in this area. The majority of the questions asked during the CIC already form part of an initial inspection and are checked each time an inspection is carried out.

In conclusion, the examination of CIC results highlights concerns regarding fire safety compliance, notably with Questions 2 and 10. Question 2, addressing the upkeep of fire doors, revealed a non-compliance rate of 6.47%, indicating a notable proportion of vessels where fire doors may not be adequately maintained. Similarly, Question 10, assessing the satisfactory execution of witnessed fire drills, demonstrated a non-compliance rate of 8.44%.

The identified non-compliance in these critical areas raises potential risks for maritime safety. In the case of fire doors, inadequately maintained barriers could compromise the containment of

fire, posing a threat to both crew and vessel integrity. Additionally, Lack of familiarity of the crew with fire drills undermines the readiness of the crew in responding effectively to fire emergencies. Based on this CIC exercise, an issue remains with respect to Fire Drill performance, similar to the results of the CIC on fire Safety completed in 2012.

2.3 Recommendations

To mitigate risks related to the fire doors and fire drills, it is imperative for stakeholders to take proactive measures.

Implementing stringent maintenance protocols for fire doors and conducting regular, realistic fire drills are essential.

Failure to address these non-compliance issues may result in heightened vulnerabilities during emergency situations, potentially leading to more severe consequences, such as increased damage to vessels, injury to crew members, and environmental hazards.

Port States to consider witnessing a drill more frequently during initial PSC inspections to ensure that ship's crew are suitable familiar with this essential shipboard operation, while taking into account cargo operations and port requirements.

CIC Questionnaire Results

3.1 Analysis

The CIC was carried out between the period of 1 September to 30 November 2023. A total of 8273 inspections of these 7190 completed a CIC questionnaire.

There were 1083 inspections carried out where the CIC was not completed this may be due to the fact that the CIC was completed previously, or no CIC was completed due to other factors.

The highest number of N/A's recorded was 2770 in relation to Question 10 – Fire Drills. It is assumed that this was due to operational reasons. The second highest N/A's (501) was in respect of Question 8, which was predicted while recognizing the Note in the guidelines relating to this Question where the question relates to a newer convention reference, which was not retroactive for existing ships. For ease of reference, the Note indicated that <u>"For ships constructed before 01/07/2002 the answer to this question should be N/A. However, in case a ship constructed before 01/07/2002 has the system installed, it should comply with the same requirements."</u>

In the recording of the CIC questions there were no "Blank" results received for any of the questions.

3.1.1 Response to CIC questionnaire (Table 1)

The following table (Table 1) shows the results on the CIC questionnaire.

For the 7190 inspections using the questionnaire the results are divided into "Yes", "No", "N/A", "Blank" and 'Detained'.

Table 1 Response to CIC questionnaire

	Υ (ES' [1]	'NO' (1)		N/A (2)		Blank (2)		Detained* (2)	
	#	%	#	%	#	%	#	%	#	%
Q1 - Are the emergency escape routes maintained in a safe condition?	6975	97.20	201	2.80	14	0.19	0	0	10	0.13
Q2 Are the fire doors maintained in good working condition?	6711	93.53	464	6.47	15	0.21	0	0	13	0.18
Q3 Has the fixed fire detection and fire alarm systems, been periodically tested in accordance with the requirements of the Administration?	7020	97.95	147	2.05	23	0.32	0	0	7	0.09
Q4 Are ventilation closing appliances capable of being closed?	6935	96.61	243	3.39	12	0.17	0	0	13	0.18
Q5 Are the means of control for power ventilation of machinery spaces operable from two grouped positions?	7115	99.69	22	0.31	53	0.74	0	0	3	0.04
Q6 Can each fire pump deliver at least the two required jets of water?	6934	99.45	38	0.55	218	3.03	0	0	9	0.12

Q7 Are the means of control provided in a position outside the machinery space for stopping ventilation and oil transfer equipment operational?	7009	99.17	59	0.83	122	1.70	0	0	10	0.13
Q8 Is the room for the fixed gas fire extinguishing medium used only for this purpose?	6643	99.31	46	0.69	501	6.97	0	0	0	0.0
Q9 Are the valves used in the fire main line operational?	7026	97.92	149	2.08	15	0.21	0	0	25	0.35
Q10 Where a fire drill was witnessed, was it found to be satisfactory?	4047	91.56	373	8.44	2770	38.53	0	0	43	0.60

* 'If the answer to this question is 'NO' the ship may be considered for detention. The details of any detention should be appropriately entered on the PSC report B.

(1) The percentages are calculated using the total number of inspections where the answer was "YES" or

"NO" only.

(2) The percentages are calculated using the total number of inspections.

3.1.2 Analysis of answers to questionnaire in relation to detention (text)

Question 10 – Where a fire drill was witnessed – was it found satisfactory, had the second highest number of "No" answers (373) although highest number of detentions 43 (0.59%).

Question 9 – are the valves used in main fire line operational, followed with 25 detentions (0.35%).

Question 2 – fire doors maintained in good working condition, followed with 13 detentions (0.9%) along with highest number of "No's" (464). Note: there was no in-depth analysis of inspection reports to determine why this occurred, however the details around if it was a single fire door compared to several may feed into the professional judgement of the PSCO in the detention decision.

Question 5 - are the means of control for power ventilation of machinery spaces operable from two grouped positions shows a high compliance of 99.69%, with only 3 detentions. Note: no in-depth analysis was completed to determine why this is the case, however this item is typically designed into the vessel and not something that is likely to have been altered since build to standards. Further, Questions 4 and 5 were recording the same deficiency code but different Convention references, therefore it would be difficult to determine if this result is accurate.

3.1.3 Analysis of CIC-topic related deficiencies (ISM related deficiencies) (text)

3.1.4 Number of inspections and number of ships in CIC

(Table 2)

Table 2 Number of inspections and number of ships in CIC

	INSPECTIONS PERFORMED WITH A CIC QUESTIONNAIRE	INSPECTIONS WITHOUT A CIC QUESTIONNAIRE
Total	7190	1083
Number inspections with deficiencies	1287	
Number CIC detentions	88	

3.1.5 Specification of CIC-topic related deficiencies

(Table 3)

Table 3 Specification of CIC-topic related deficiencies

Based on Inspections with CIC related deficiencies Months 9/10/11							
CIC-topic related deficiencies		# of defi (One in can have deficie	ciencies, spection e multiple encies)	#of define recorded for define	ciencies as ground ention	# of deficiencies recorded as RO related	
Deficiency	Convention	2022	2023	2022	2023	2022	2023
Emergency, lighting,batter 04103 and switches	ries SOLAS ch. II-1 Parts C, D, E, F	238	361	19	42	0	0
04109 Fire drills	SOLAS ch. III	62	238	4	59	0	0
Fire doors/openings in 07105 fire-resisting divisions	SOLAS ch. II-2	260	490	61	86	0	0
07106 Fire detection and alarm system	SOLAS ch. II-2	119	245	39	61	1	0
07109 Fixed fire extinguishing installation	SOLAS ch. II-2	97	260	35	73	2	0
07110 Fire fighting equipment an appliances	d SOLAS ch. II-2	162	392	22	57	1	3
07113 Fire pumps and its pipes	SOLAS ch. II-2	45	115	33	37	3	2
07114 Remote Means of control (opening,pumps,ventilation Machinery spaces	n,etc.) SOLAS ch. II-2	48	146	10	40	3	1
07116 Ventilation	SOLAS ch. II-2	62	336	56	68	4	3
07120 Means of escape	SOLAS ch. II-2	63	171	14	31	1	1
07125 Evaluation of crew perform (fire drills)	nance SOLAS ch. II-2	15	106	0	18	0	0
Grand total		1171	2860	293	572	15	10

3.1.6 Number of inspected ships per Ship Risk Profile

(Table 4)

Table 4 Number of inspected ships per Ship Risk Profile shows that the majority of the vessels with CIC deficiencies and CIC related detentions were High Risk ships.

	Based on Inspections with CIC related deficiencies in Months 9/10/11								
CIC-topic related deficiencies	# of defic (One ins can have deficie	ciencies, spection multiple ncies)	#of defic record grour dete	ciencies led as nd for ntion	# of deficiencies recorded as RO related				
Ship Risk Profile	2022	2023	2022	2023	2022	2023			
HRS	469	1353	162	364	8	5			
LRS	141	187	21	21	0	2			
SRS	557 1320		110	187	7	3			
UNKNOWN	4	0	0	0	0	0			
Grand Total	1171	2860	293	572	15	10			

Table 4 Number of inspected ships per Ship Risk Profile

3.1.7 Number of inspected ships and detentions per ship type (Table 5)

Bulk Carriers had the highest number of CIC related deficiencies and CIC related deficiencies recorded as grounds for detention (1018/221) followed by General cargo/multipurpose ships (704/184).

	Based on Inspections with CIC related deficiencies in Months 9/10/11								
CIC-topic related deficiencies	# of deficiencies, # (One inspection can r have multiple f deficiencies)		#of deficier recorded as for detentio	ncies s ground n	# of deficiencies recorded as RO related				
Shiptype	2022	2023	2022 2023		2022	2023			
Bulk carrier	402	1018	75	221	3	2			
Chemical tanker	17	33	0	8	0	1			
Container	154	507	25	57	0	1			
Gas carrier	7	63	3	25	0	2			
General cargo/multipurpose	373	704	128	184	10	2			
Heavy load	3	11	0 0		0	0			
Offshore supply	1	16	2 0		0	0			
Oil tanker	92	123	38	44	2	2			
Oil tanker/Chemical tanker	59	131	21	13		0			
Other	34	27	3	2	0				
Other special activities	13	26	6	6	0	0			
Passenger ship	20	16	0	0	0	0			
Refrigerated cargo	20	91	2	6	0	0			
Ro-Ro cargo	6	10	11	6	0	0			
Ro-Ro passenger ship	12	8	0	0	0	0			
Special purpose ship	2	5	0	0	0	0			
Tug	15	14	0	0	0	0			
Vehicle carrier		57		0		0			
Grand Total 63+	1171	2860	293	572	15	10			

Table 5 Number of inspected ships and detentions per ship type

3.1.8 Inspections and detentions per Flag State

(see Annex 1.2)

The flag State with highest number of CIC related deficiencies was Panama (898) followed by Liberia (372), Marshall Islands (213) and Hong Kong, China (208).

Ships with CIC related deficiencies marked as grounds for detention, the highest number, by flag State, was Panama (163), Liberia (110), Belize (47) and Sierra Leone (46).

No trend could be discerned for the Flag State performance which had CIC related deficiencies or detentions as they were made up of a combination of White, Grey, Black and Not Listed on the Tokyo WGB list.

3.1.9 Ship age overview

(Table 6)

Based on the CIC's related deficiencies the ship age group with the highest number of deficiencies was 13-18 years

Table 6 Ship age overview

	Based on 9/10/11	Based on Inspections with CIC related deficiencies in Months 9/10/11										
CIC-topic related deficiencies	# of deficie (One insp have mult deficienci	encies, ection can iple es)	#of deficier recorded as for detentio	ncies s ground n	# of deficiencies recorded as RO related							
Shipage	2022	2023	2022 2023		2022	2023						
0 - 6	57	180	4	6	0	0						
7 - 12	186	605	17	69	0	3						
13 - 18	467	1099	127	226	8	2						
19 - 24	227	571	83	156	6	2						
25 - 30	173	292	43	97	1	3						
31 - 35	42	70	13	14	0	0						
35+	19	43	6	4	0	0						
Grand Total	1171	2860	293	572	15	10						

Annex 1.1 Inspection form for the CIC

MEMORANDUM OF UNDERSTANDING ON PORT STATE CONTROL IN THE ASIA-PACIFIC REGION



CONCENTRATED INSPECTION ON FIRE SAFETY 01/09/2023 to 30/11/2023

CIC on FIRE SAFETY							
Inspection Authority							
Ship Name	IMO Number						
Date of Inspection	Inspection Port						

QUESTIONS 1 TO 10 ANSWERED WITH A "NO" MUST BE ACCOMPANIED BY A RELEVANT DEFICIENCY ON THE REPORT OF INSPECTION.

No.	Item	Yes	No	N/A	Detention
1*	Are the emergency escape routes maintained in a safe condition? (07120/04103)				
2*	Are the fire doors maintained in good working condition? (07105)				
3*	Has the fixed fire detection and fire alarm systems, been periodically tested in accordance with the requirements of the Administration? (07106)				
4*	Are ventilation closing appliances capable of being closed? (07116)				
5*	Are the means of control for power ventilation of machinery spaces operable from two grouped positions? (07116)				
6*	Can each fire pump deliver at least the two required jets of water? (07113)				
7*	Are the means of control provided in a position outside the machinery space for stopping ventilation and oil transfer equipment operational? (07114)				
8*	Is the room for the fixed gas fire extinguishing medium used only for this purpose? (07109)				
9*	Are the valves used in the fire main line operational? (07110)				
10*	Where a fire drill was witnessed, was it found to be satisfactory? (04109/07125)				

<u>Note</u>: If "No" is ticked for questions marked with an asterisk "*", the ship may be considered for detention.

Inspections and detentions per Flag State Annex 1.2

Table Annex 1.2 Inspections and detentions per Flag State										
	Based on 9/10/11	Inspectio	ns with	CIC relate	ed deficier	ncies in	Months			
CIC-topic related deficiencies	# of defic (One insp have n deficie	# of deficiencies, (One inspection can have multiple deficiencies)		encies led as d for ion	# of defic recorded relat	Current position on WGB list				
Flag	2022	2023	2022	2023	2022	2023				
Antigua and Barbuda	7	18	1	2	0	0	Grey			
Bahamas	14	43	5	7	0	0	White			
Bangladesh	3	9	0	0	0	0	White			
Barbados	1	2	0	0	0	0	Grey			
Belgium	0	1	0	0	0	0	Grey			
Belize	93	193	51	47	1	2	Grey			
Cameroon	0	1	1	0	0	0	Not Listed			
Cayman Islands	0	6	0	0	0	0	White			
China	27	44	0	0	0	0	White			
Comoros	0	4	0	0	0	0	Not Listed			
Cook Islands	6	4	1	7	1	0	Grey			
Curacao	0	2	0	0	0	0	Not Listed			
Cyprus	11	36	2	4	0	0	White			
Denmark	1	15	1	2	0	0	White			
Djibouti	0	0	0	1	0	0	Not Listed			
Dominica	0	0	2	1	0	0	Black			
Egypt	0	1	0	0	0	0	Not Listed			
France	1	3	0	0	0	0	White			
Gabon	0	1	3	0	0	0	Not Listed			
Germany	1	3	0	0	0	0	White			
Gibraltar	0	1	0	0	0	0	Grey			
Greece	2	17	0	4	0	0	White			
Guinea-Bissau	2	4	0	0	0	0	Not Listed			
Hong Kong, China	82	208	8	4	0	0	White			
India	0	2	0	4	0	0	Grey			
Indonesia	16	10	12	12	0	0	White			
Iran, Islamic Republic of	0	1	0	5	0	0	White			

	Based on 9/10/11	Inspectio	ns with	CIC relate	ed deficier	ncies in	Months
CIC-topic related deficiencies	# of deficiencies, (One inspection can have multiple deficiencies)		#of deficie record ground detent	encies ed as d for ion	# of defic recorded relat	Current position on WGB list	
Flag	2022	2023	2022	2023	2022	2023	
Isle of Man (UK)	7	11	0	0	0	0	White
Israel	0	1	0	0	0	0	Not Listed
Italy	4	5	0	3	0	0	White
Jamaica	2	1	0	0	0	0	Grey
Japan	4	19	0	2	0	0	White
Korea, Republic of	41	132	0	14	0	0	White
Kuwait	0	3	0	0	0	0	Not Listed
Liberia	91	372	18	110	1	1	White
Luxembourg	0	0	0	1	0	0	White
Malaysia	5	28	3	0	0	0	White
Malta	24	49	1	16	0	1	White
Marshall Islands	64	213	14	19	0	1	White
Mongolia	9	10	8	5	1	0	Black
Montenegro	0	2	1	1	0	0	Not Listed
Nauru	1	1	0	0	0	0	Not Listed
Netherlands	2	7	0	0	0	0	Grey
Niue	1	1	0	0	0	0	White
Norway	14	14	1	1	0	0	White
Palau	4	8	2	12	0	0	Grey
Panama	385	898	92	163	8	4	White
Philippines	8	18	0	3	0	0	White
Portugal	8	26	2	3	0	0	White
Russian Federation	4	34	0	0	0	0	Grey
Saint Kitts and Nevis	0	4	0	4	0	0	Not Listed
Saint Vincent and the Grenadines	1	1	0	3	0	0	Grey
Sao Tome and Principe	0	0	0	1	0	0	Not Listed
Sierra Leone	55	77	31	46	2	0	Black
Singapore	54	146	4	4	0	0	White
Spain	0	1	0	0	0	0	Not Listed

	Based on Inspections with CIC related deficiencies in Months 9/10/11									
CIC-topic related deficiencies	# of defic (One insp have n deficie	ciencies, ection can nultiple encies)	#of deficie record ground detent	encies ed as d for ion	# of defic recorded relat	Current position on WGB list				
Flag	2022	2023	2022	2023	2022	2023				
Sweden	0	1	0	0	0	0	Not Listed			
Switzerland	0	1	0	1	0	0	Not Listed			
Taiwan, China	1	4	0	0	0	0	White			
Tanzania, United Republic of	1	4	2	15	1	0	Not Listed			
Thailand	10	13	0	2	0	0	White			
Тодо	19	26	18	10	0	0	Black			
Turkey	2	2	0	0	0	0	White			
Tuvalu	7	6	0	6	0	0	White			
United Kingdom	7	7	1	0	0	0	White			
United States	0	3	0	3	0	1	Grey			
Vanuatu	1	3	0	0	0	0	White			
Viet Nam	60	79	4	22	0	0	White			
Unknown Flag	0	0	0	3	0	0	Not Listed			
Grand Total	1171	2860	293	572	15	10				

* The official BGW-list of Tokyo MoU is published in the annual report. The scope of this table is only the CIC.