

## Non-Compliance with M190 Categorisation and Recording of Findings

### Introduction

It has come to the attention of the International Marine Contractors Association (IMCA) that there have been reports of non-compliance with IMCA M190 Code\* of practice for developing and conducting DP Annual Trials programmes concerning the categorisation and recording of findings, particularly those classified as 'A' findings. This note addresses the significance of adhering to these guidelines, the responsibilities of DP practitioners, vessel operators and clients, and the impact of failing to comply with these standards.

\* **IMCA Code of Practice** – A document produced by the Association, the uniform application of which is recognised as essential for the safe and efficient conduct of marine contracting projects. IMCA expects the highest level of compliance with this category of document from its Members.

### Importance of Compliance with IMCA M190

IMCA M190 provides an industry-recognised framework for categorising and recording findings during DP Annual Trials. This Code of Practice is designed to ensure that any issues identified during Annual DP Trials are properly documented and addressed. This process is critical for maintaining the integrity and safety of DP systems. Categorising findings accurately, especially those that fall into the 'A' category, is essential for identifying serious deficiencies that could potentially jeopardise vessel safety.

### Roles and Responsibilities

It is incumbent upon both the DP practitioner witnessing the trials and the vessel operator to issue and accept 'A' and 'B' findings in the spirit in which they are given. The DP practitioner plays a crucial role in objectively assessing the DP system and identifying any deviations from expected performance and documenting the findings in the DP Trials report. Meanwhile, the vessel operator is responsible for addressing these findings and implementing necessary corrective actions.

The categorisation of findings into 'A' (critical), 'B' (non-critical), or 'C' (observations) categories is a fundamental aspect of this process. 'A' findings denote significant issues that require immediate attention and rectification before the vessel can safely operate in DP mode. 'B' findings indicate issues that need to be addressed but do not pose an immediate threat to vessel safety. 'C' findings are observations that may not directly impact safety but still require attention.

When issuing a finding, the DP practitioner must clearly explain the reason for the non-conformity and whether the Code of Practice/Class Rule or IMO regulation has been violated. The assigning of a Finding must be evidence-based. IMCA DP practitioners and company DP authorities must follow the code of conduct associated with their professional accreditation. IMCA is monitoring this and may suspend accreditation for practitioners and company authorities who wilfully violate the code of conduct.

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## **Pressure on DP Consultancies from Vessel Operators and Clients**

It has been reported that some vessel owners/operators are pressuring DP consultancies to downgrade findings. This practice is highly detrimental to the safety culture that IMCA strives to promote. DP consultancies should conduct their assessments without undue influence, ensuring that all findings are reported accurately, objectively and with integrity.

The pressure to downgrade findings stems directly from 'Commercial Pressure'. It flows from higher management to operations and then onwards. Vessel operators, clients, and DP practitioners must understand the true value of DP Trials being carried out independently, without fear or favour, and embrace and leverage the entire process for continuous safety improvement.

The integrity of the DP assurance process relies on the honest and transparent reporting of findings. Downgrading findings for convenience or to avoid inconvenience undermines the purpose of these assessments and can lead to serious safety hazards. Vessel owners must understand that findings are not criticisms but opportunities for improvement. Addressing these findings proactively enhances the overall safety and reliability of DP operations.

## **Benefits of Addressing Findings**

Findings, especially those classified as 'A', must be viewed as critical opportunities to bolster the safety of DP operations. These findings highlight threats that compromise the redundancy concept or violate the protocols established in IMCA M190 as well as IMO/Class requirements. It is imperative to address these threats promptly and effectively to ensure operational integrity and safety.

The spirit in which findings are given and received is crucial. DP practitioners and vessel operators should view findings as constructive feedback to improve vessel safety standards. A culture of openness and continuous improvement is essential for maintaining high safety standards in the DP sector.

## **Conclusion**

Adherence to IMCA M190 Code of Practice for categorising and recording findings is essential for maintaining the safety and integrity of DP operations. DP practitioners and vessel operators are responsible for ensuring that findings are accurately reported and addressed. DP consultancies must resist pressure to downgrade findings and conduct their assessments with integrity and objectivity.

We urge all stakeholders to commit to these standards and to view findings as opportunities for improvement. The collaborative effort of all parties involved is vital to enhancing the safety and efficiency of DP operations.

Your cooperation and commitment to these standards are highly appreciated. By working together, we can ensure that DP operations continue to meet the highest safety standards.

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## **Related Guidance**

- ◆ [IMCA M190](#) – Code of practice for developing and conducting DP annual trials programmes
- ◆ [IMCA M191](#) – Code of practice for DP annual trials for mobile offshore drilling units
- ◆ [IMCA M166](#) – Code of practice on failure modes and effects analysis (FMEA)