# Final Report

# SINKING OF TANKER
# SILVER SINCERE
# IN SINGAPORE TERRITORIAL WATERS
# ON 12 JANUARY 2025

TIB/MAI/CAS.188

Transport Safety Investigation Bureau of Singapore
Ministry of Transport
Singapore

20 November 2025

***The Transport Safety Investigation Bureau of Singapore***

*The Transport Safety Investigation Bureau of Singapore (TSIB) is the air, marine and rail accidents and incidents investigation authority in Singapore. Its mission is to promote transport safety through the conduct of independent investigations into air, marine and rail accidents and incidents.*

*TSIB conducts marine safety investigations in accordance with the Singapore Transport Safety Investigations Act 2018, Transport Safety Investigations (Marine Occurrences) Regulations 2023 and the Casualty Investigation Code under SOLAS Regulation XI-1/6 adopted by the International Maritime Organization (IMO) Resolution MSC 255(84).*

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## Table of Contents

**ABBREVIATIONS**

| | |
|---|---|
| AIS | Automatic Identification System |
| CE | Chief Engineer |
| DOC | Document of Compliance (ISM related) |
| ISM | International Management System |
| MPA | Maritime and Port Authority of Singapore |
| NC | Non-conformities |
| NUC | Not Under Command |
| OPL | Off Port Limit |
| SCM | Ships Classification Malaysia |
| SMC | Safety Management Certificate |
| SMS | Safety Management System |
| SS | Silver Sincere |
| STCW | The International Convention on Standards of Training, Certification and Watch keeping for Seafarers |
| STS | Ship to Ship Transfer |
| TSS | Traffic Separation Scheme |
| VHF | Very High Frequence |
| VTIS | Vessel Traffic Information System |
| 2E | Second Engineer |

## SYNOPSIS

On 9 January 2025, the Malaysia registered oil tanker, Silver Sincere (SS), was on a coastal voyage to high seas for a ship-to-ship (STS) transfer operation. Due to its low freeboard (less than 1m) and moderate sea swells (1.5 - 2.5m), sea water entered the port side deck resulting in water ingression into one of the port side ballast tanks and the engine room which caused SS to list to the port side.

The ballast pump was inoperative and could not be used to correct the port listing, and eventually SS sank in Singapore territorial waters off Pedra Branca on 12 January 2025. The failure of the two generators resulted in the loss of propulsion and steering and resulted in SS being in a “not under command” situation.

All eight crew members abandoned the vessel and were safely rescued by a passing vessel.

The Transport Safety Investigation Bureau of Singapore classified the occurrence as a very serious marine casualty.

The investigation revealed that several defects on the hull and equipment were not addressed before commencement of the coastal voyage, such as an inoperative ballast pump, underperforming generator, corroded drain pipe in the engine room and broken air vent head on the port side deck. These defects caused seawater ingression into the port side ballast tanks and engine room resulting the port listing and subsequent sinking. SS was not fit for the intended coastal voyage.

The investigation also revealed that the Master did not exercise his overriding authority as stated in the Company’s SMS procedures to terminate the coastal voyage and acceded to the Company’s arrangement for the defects to be repaired after the coastal voyage. The decision to continue the voyage had compromised the safety of the crew and ship.

The investigation further revealed that the ship’s crew were concerned of the corroded and de-shaped mid floor structures of ballast tanks which were apparently not addressed during dry-docking, no follow-up repairs were carried out, indicating a possibility of inadequacy of ship maintenance.

## DETAILS OF VESSEL

| | |
|---|---|
| Name | Silver Sincere |
| IMO number | 8712829 |
| Flag registry | Malaysia |
| Classification society | Ships Classification Malaysia (SCM)[1] |
| Ship type | Oil tanker |
| Keel laid | October 1987 |
| Owner / ISM Manager[2] | CCK Capital SDN BHD / Peninsular Marine SDN. BHD. |
| Hull | Steel |
| Gross tonnage | 739 |
| Length overall | 64.238m |
| Moulded breadth | 10.0m |
| Moulded depth | 4.3m |
| Engine power | Hanshin LH 28G, 1400 PS x 395 RPM, diesel engine, 1029 kW |
| Service speed | Single screw propeller, at about 11.3 knots |


Silver Sincere (photo of ex-name: Arowana Sevilla)
(*Source:* MarineTraffic)

[1] As per the International Management Code for the Safe Operation of Ships and for Pollution Prevention (ISM Code), SCM was the Recognised Organisation (RO) for carrying out ISM audit and issuance of ISM related certificates (except the Document of Compliance was issued by the Surveyor General of Ships, Malaysia), as well as for survey and issuance of other statutory certificates.
[2] The "ISM Manager" is referred to as the Company in this investigation report.

## 1 FACTUAL INFORMATION

All times used in this report are Singapore Local Time, which is eight hours (H) ahead of Coordinated Universal Time (UTC+8H).

The investigation team reviewed supporting documents provided by the Company and crew of Silver Sincere. Interviews[3] were conducted with all eight crew members as well as to verify the information provided.

### 1.1 Sequence of events

1.1.1 At about 2327H on 9 January 2025, the Malaysia registered oil tanker, Silver Sincere (SS) departed Port Klang, Malaysia with waste oil cargo carried onboard. The voyage was expected to be between five and seven days depending on weather and operational conditions. SS was proceeding with an average speed of 2-4 knots due to head seas.

1.1.2 On 11 January 2025, at about 2015H, while SS was transiting the Sector 7 of the Singapore Strait (see **figure 1**), the Chief Engineer (CE) reported to the Master seawater ingressing intermittently into the engine room from a drain pipe[4] (see **figure 2**) located at the port side hull near the aft part of the engine room. The Master in turn informed the Company about the situation and was instructed to plug the leak using rags or wood materials to reduce the water ingression, and to use bilge pump and wilden pump[5] to cope with the situation. A wilden pump was deployed to clear the seawater from the engine room which was manageable and under control until the noon of 12 January 2025.

[3] TSIB recognises and appreciates the assistance and cooperation provided by Indonesia's National Transportation Safety Committee (NTSC), the Directorate General of Sea Transportation and the Harbour Master's Office of the Port of Tanjung Uban for facilitating the crew interviews.
[4] The drain pipe was connected to a scupper on the main deck port side to drain water overboard through engine room. The leak was at the welded connection of the drain pipe to the scupper.
[5] An air operated diaphragm pump used for transferring liquid like water or bilges.

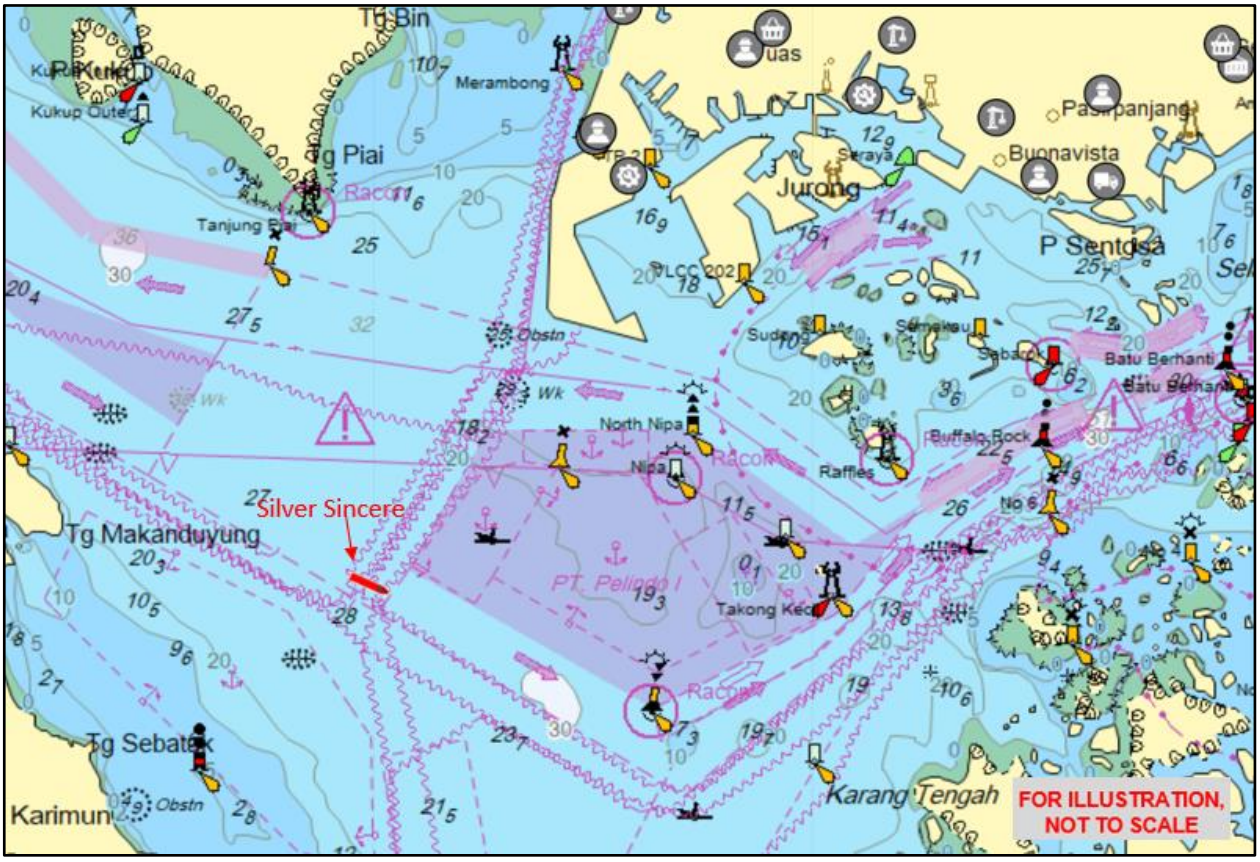


Figure 1 - Approximate location of SS (red annotation) when the first seawater ingression into engine room was reported (*Source*: MarineTraffic)

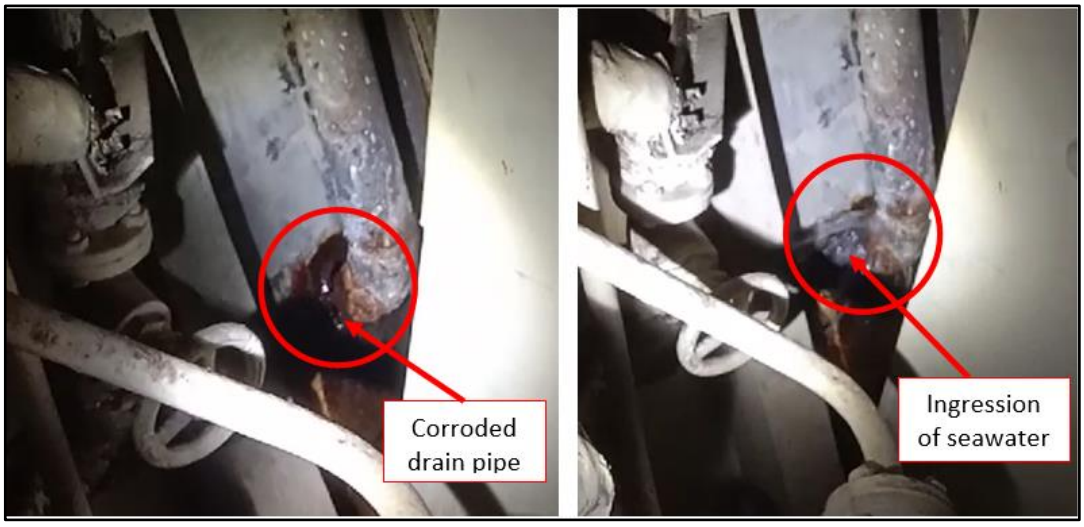


Figure 2 – Corroded drain pipe resulted in water ingress (*Source*: Video taken by the crew of SS, annotated by TSIB)

1.1.3 By about 1200H on 12 January 2025, the water level in the engine room had reduced. The Second Engineer (2E) started sounding all fuel tanks and confirmed no signs of seawater ingress into fuel tanks. Bunker fuel in the port tank was transferred to the centre tank due to the listing of one to two degrees to port side. The transfer did not help to upright the vessel. SS remained listing to its port side.

1.1.4 At about 1300H, the Master went on deck for an inspection and discovered a broken air vent[6] at a port side ballast tank. According to the Master, this broken air vent had caused seawater to enter the ballast tank and develop further list as SS continued to experience head seas. The main engine of SS also experienced intermittent overspeed when the propeller was out of seawater due to sea swells.

1.1.5 At about 1540H, SS reported to the VTIS[7] East on VHF radio channel 10 that the vessel was taking in water and listing to port about three to four degrees. The same report was made to the Company. The Maritime and Port Authority of Singapore (MPA) responded to the distress call.

1.1.6 About five minutes later, SS lost its propulsion due to the failure of generators, which also caused a loss of electrical power, SS's status became "Not Under Command" (NUC). A radio message of NUC status and Mayday with SS' position[8] was broadcasted over VHF radio channel 16 by SS.

1.1.7 More water, as a result of sea swells, continued getting on deck when SS rolled violently due to the loss of the capability to steer. SS listed further to its port side to about 15 to 20 degrees (see **figure 3**). The vessel took in more seawater through the broken air vent at the port ballast tank and other deck openings.

[6] The head of air vent was hit by waves and broke off from its base due to poor condition. The Master could not ascertain the broken air vent was from no.3 or no.4 ballast tank at the time of inspection.
[7] Vessel Traffic Information System. Ships in the Singapore Strait report to the VTIS under STRAITREP. The VTIS is operated by the Maritime and Port Authority of Singapore (MPA) for the safe and efficient navigation of ships.
[8] Latitude 01° 18.05´N Longitude 104° 22.25´E

Figure 3 – SS listed to port with half of the main deck immersed in water
(*Source*: Video taken by the crew of SS)

1.1.8 At about 1600H, the port list increased further to about 30 degrees, the Master of SS ordered all crew members to don lifejackets and prepare to abandon the vessel. Two liferafts were launched, the starboard liferaft was inflated and capsized due to the port list of the vessel. All eight crew members evacuated safely onto the port liferaft without injury.

1.1.9 Soon after the evacuation, the aft part of the vessel started sinking. A coordination of search and rescue efforts was made by the MPA, involving the Republic of Singapore Navy and Singapore Police Coast Guard.

1.1.10 After drifting for about two hours, the MPA coordinated with an Indonesia registered general cargo ship, Intan Daya 368, which proceeded to assist in recovering all eight crew members from the liferaft. All crew eventually disembarked at Batu Ampar, Indonesia.

1.1.11 At about 1804H, SS capsized and sank off the east-bound lane of the traffic separation scheme (TSS) of the Singapore Strait. Navigational advisories were

broadcasted by the MPA, informing passing vessels to keep clear of the incident location. At the time of publishing this investigation report, the sunken SS was not salvaged.

## 1.2 The ship

1.2.1 SS was registered as an oil tanker in 2007. She was previously named as "Arowana Sevilla" and renamed to "Silver Sincere" on 4 January 2021. According to a "Statement of Fact" issued on 6 December 2021 by its classification society, SCM[9], SS was constructed with a double hull and a double bottom.

1.2.2 Prior to departing its last port on 9 January 2025, SS had been operating in Port Klang as a bunker tanker since 19 July 2024. A Domestic Shipping Licence was issued to SS on 22 April 2024, by the Domestic Shipping Licencing Board of Malaysia, authorising the bunkering service in Port Klang.

1.2.3 According to the Chief Officer, about 1000mt of waste oil cargo was loaded onboard SS in three phases in Port Klang since September 2023, and the last phase of loading was completed in January 2025. The waste oil cargo was distributed to all four cargo oil tanks (COTs, see **figure 4**) and two slop tanks. Eight ballast tanks, one on each side of the COT, served as double hull[10].

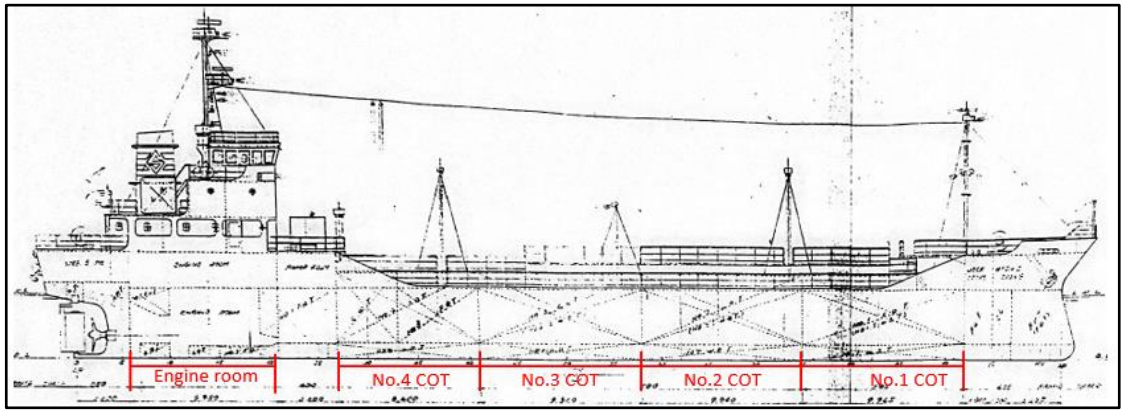


Figure 4 – location of COTs and engine room on General Arrangement plan (*Source*: the Company, annotated in red by TSIB)

1.2.4 The departure draft was about 3.5m with a freeboard of less than 1m. In laden

[9] A Recognised Organisation approved by the flag Administration of Malaysia.
[10] MARPOL, Annex I, Regulation 19, double hull and double bottom requirements for oil tankers.

condition, SS could sail at a maximum speed of about 6 knots in calm seas.

1.2.5 There were two generators onboard of the same make and capacity, both had been overhauled in April 2024 before an intermediate survey by SCM. However, according to the Master, one of them was typically providing output of 60-70% of its designed capacity and any slight increase of electrical load above 70% would trip this generator. The other generator functioned normally and capable of providing output of its designed capacity.

1.2.6 According to the CE, prior to this voyage, SS' engine had never been operating for more than 24 hours continuously since he joined SS. The ballast pump had some issues and was inoperative, the Master could not use it to adjust the ballast to reduce the port list.

1.2.7 The Cargo Ship Safety Construction Certificate issued to SS on 25 May 2021 with a validity till 30 March 2026, indicating that the inspection of bottom hull was done in March 2019 and March 2021. The Cargo Ship Safety Construction Certificate was last endorsed by SCM after the intermediate survey conducted on 22 April 2024.

1.2.8 SS was certified to trade in coastal areas, not exceeding 20 nautical miles from the nearest land.

## 1.3 The crew

1.3.1 The complement of crew onboard SS were Indonesians, except the Chief Officer was from Myanmar. All crew held valid STCW[11] competency certificates required for their respective positions onboard. The working language was English and Bahasa Malaysia[12].

1.3.2 The qualification and experience of the Master, relevant officers and crew are tabulated in the table 1 below.

| Designation onboard | Age | Qualification | Duration onboard (Months) | In rank service (Years) | Service in Company (years) | Working schedule onboard |
|---|---|---|---|---|---|---|

[11] The International Convention on Standards of Training, Certification and Watch keeping for Seafarers (or STCW), 1978 sets qualification standards for masters, officers and watch personnel on seagoing merchant ships.
[12] As part of qualification requirements for crew recruitment.

| | | | | | | |
|---|---|---|---|---|---|---|
| Master | 50 | COC – Master[13] / STCW II/2, IV/2 | 11 | 22 | 3 | On daywork[14] |
| Chief Officer (CO) | 41 | COC – Chief Officer / STCW II/2, IV/2 | 11 | 3 | 2 | 1200H – 1800H<br>0000H – 0600H |
| Second Officer | 31 | COC – Deck Officer, Class III / STCW II/1, IV/2 | 5 | 2 | 2 | 0600H – 1200H<br>1800H – 2400H |
| Chief Engineer (CE) | 32 | COC – Chief Engineer[15] / STCW III/2, III/3 | 11 | 2 | 2 | 0800H – 1200H<br>2000H – 2400H |
| Second Engineer (2E) | 33 | COC – Second Engineer / STCW III/2, III/3 | 11 | 2 | 2 | 1200H – 1600H<br>0000H – 0400H |
| Bosun | 35 | Deck Rating as per STCW IV/1 | 11 | 2 | 2 | 1200H – 1800H<br>0000H – 0600H |
| ASD | 32 | Deck Rating as per STCW II/5 | 11 | 5 | 2 | 0600H – 1200H<br>1800H – 2400H |
| Greaser | 46 | Engine Rating as per STCW III/5 | 11 | 14 | 3 | 1600H – 2000H<br>0400H – 0800H |

Table 1

1.3.3 The Master had 12 years' experience sailing on oil tankers. He attended advanced training, and a subsequent refresher course, on oil tanker cargo operations and was certified to serve on oil tankers. The Master also attended the training on the leadership and managerial skills in April 2018. According to the Company's safety management system (SMS) procedures, one of its masters' responsibilities was to log down all damages sustained on a vessel and ensure that all accidents were reported to the Company at the earliest possible time.

1.3.4 The CO had three and half years' experience sailing on oil tankers. He attended a training in September 2023 and obtained a certificate of proficiency for serving onboard oil and chemical tankers.

1.3.5 The CE and 2E had sailed onboard oil tankers for four and nine years respectively. Prior to the order of abandoning ship, the 2E was on duty but stayed outside the engine room with a portable radio due to the rising water

[13] Restricted to near coastal voyages on vessels with gross tonnage 3000 or more.
[14] Normally from 0800H to 1700H. The Master remained on call at any time if needed from any other crew onboard SS.
[15] Restricted to near coastal voyages on vessels with 3000kW propulsion power or more.

level in the engine room. The CE was resting in his cabin, and he was aware of the water leak issue in the morning.

1.3.6 According to the interviews, all crew members kept their work/rest hours as rostered. At the time of abandoning ship, only essential documents such as trading certificates were carried along by the crew, all other records and logbooks were left onboard. The investigation team was unable to access records to verify the work/rest hours for compliance with the STCW and Marine Labour Convention requirements.

## 1.4 The voyage

1.4.1 According to the Report of Port Clearance issued to SS on 9 January 2025, the next port of call was Pulau Sambu Riau, Indonesia[16] as declared by a boarding officer of the Company. The AIS[17] track indicated that SS had passed the route to Pulau Sambu Riau at about 0715H on 12 January 2025. Instead, SS continued its passage easterly and encountered the listing and sinking in Singapore territorial waters off Pedra Branca.

1.4.2 According to the Master and other crew members, the instructions given by the Company, prior to the departure of last port, Port Klang, was to proceed to east OPL[18] of Malaysia, to carry out a ship-to-ship (STS) transfer of waste oil cargo to another vessel at high seas. The cargo receiving vessel was unknown. The occurrence happened before reaching the intended location for STS transfer.

## 1.5 The safety management system

1.5.1 The Company managed a fleet of oil tankers including SS. The Document of Compliance (DOC) was issued to the Company on 27 June 2024 by the Malaysia Marine Department, based on the completion date of audit on 26 June 2024. The DOC was valid till 26 June 2029.

1.5.2 The full-term Safety Management Certificate (SMC) was issued to SS on 5 December 2024 by SCM, based on the completion of verification audit on 2 October 2024. The SMC was valid until 1 October 2029. Two minor non-

[16] According to the Master, the next port of call is referred to Pulau Sambu, Indonesia.
[17] Automatic Identification System.
[18] Off port limit.

conformities[19] (NCs) were raised during the audit and subsequently rectified and closed on 29 November 2024.

1.5.3 The Company carried out an internal audit onboard SS on 26 February 2024 as required by the International Safety Management (ISM) Code. There was no deficiency raised.

1.5.4 The Company's SMS procedures written in English covered many areas. A section on "Staff Matters", in respect to the "Conduct in Emergencies", highlighted that the master had overriding authority in any emergency or any other situation when the safety of the vessel or any person onboard was at stake. The master also held full responsibilities and entitled to decline management's decision affecting the safety of crew and vessel.

1.5.5 The navigation section under the "Vessel Operations Manual" in the SMS procedures stated that the intended voyage was to be planned in advance taking into consideration all pertinent information and any courses laid down were required to be checked before commencement of the voyage.

## 1.6 Additional information

1.6.1 The leaking drain pipe discovered by the CE could not be temporarily clamped or welded due to its location. The engineers attempted to arrest the leak using rags but to no avail. The wilden pump was not able to cope with the continuous ingress of seawater and the situation was exacerbated by the further port listing.

1.6.2 According to the Master, due to the low freeboard, SS occasionally encountered seawater coming on deck from port side and slowly developed[20] to a port list about one to two degrees when transiting the Malacca Strait. As the passage continued easterly, the moderate sea had worsened the situation as sea waves frequently washed on deck from its port side (see **figure 5a**). As a result, the port list deteriorated to about 15-20 degrees after passing north of Pulau Bintan, Indonesia while on the north-easterly course in the Singapore

[19] One NC was related to master's responsibilities and shipboard operation, e.g. missing testing procedures on oily water separator and emergency steering. Another NC was related to the maintenance of equipment, e.g. to request for new smoke detector tester and to replace damaged fuel filter for rescue boat engine.

[20] The Master suspected seawater had entered the port no.3 or no.4 water ballast tanks through the broken vent head, or the ballasting pipes located on deck which were in poor condition. The investigation team was unable to verify this statement as SS had sunk and had not been salvaged.

Strait. Due to the port list, the Master decided to deviate from the eastbound lane of the TSS of the Singapore Strait (see **figure 5b**) for an opportunity to drop anchor at a safe place.

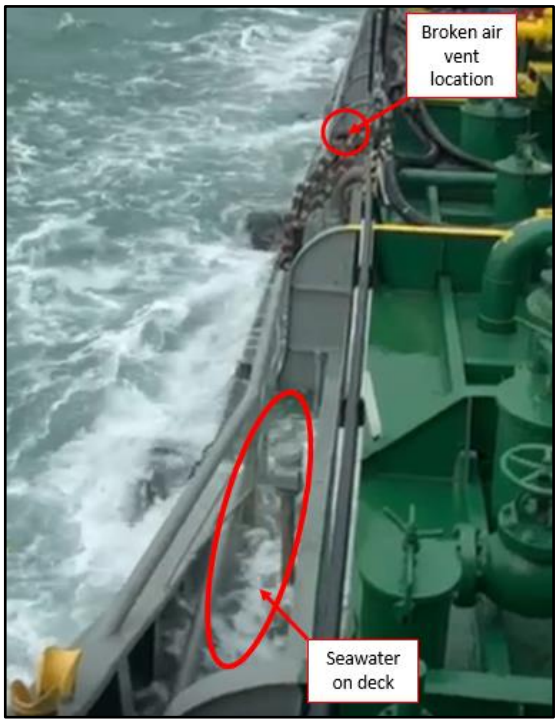


Figure 5a – Seawater washed on port deck and location of the broken air vent (*Source*: the crew of SS, annotated by TSIB)

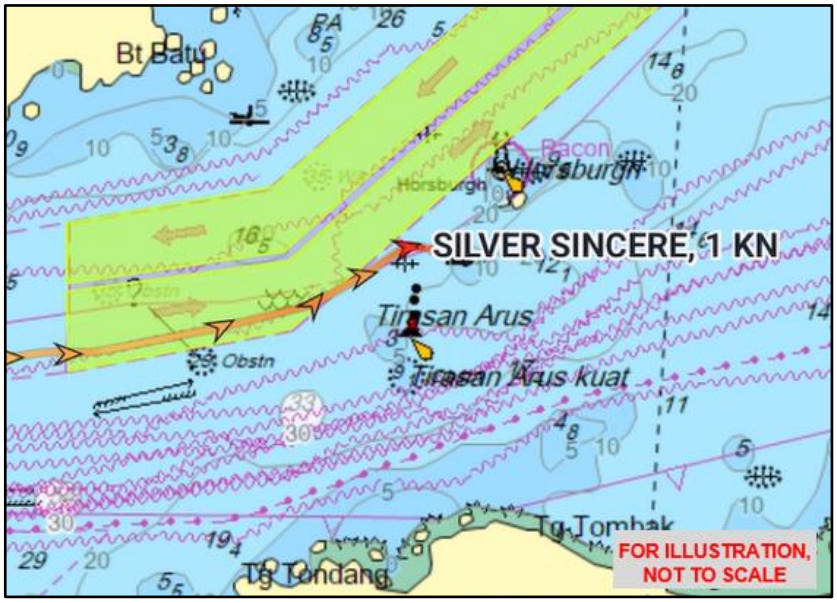


Figure 5b – SS (orange arrow marks) deviated from the eastbound lane of the Singapore Strait (*Source*: MarineTraffic)

1.6.3 During the interview, the crew members expressed their concerns on the poor condition of SS citing heavily corroded ship structures and thinned plating observed in many areas as the vessel was more than 30 years old. The crew also mentioned that the mid floor structures of ballast tanks were corroded and de-shaped. These poor structures were not addressed adequately during the last dry-docking in February-March 2024, and there were no follow-up repairs (see **Figure 6**).

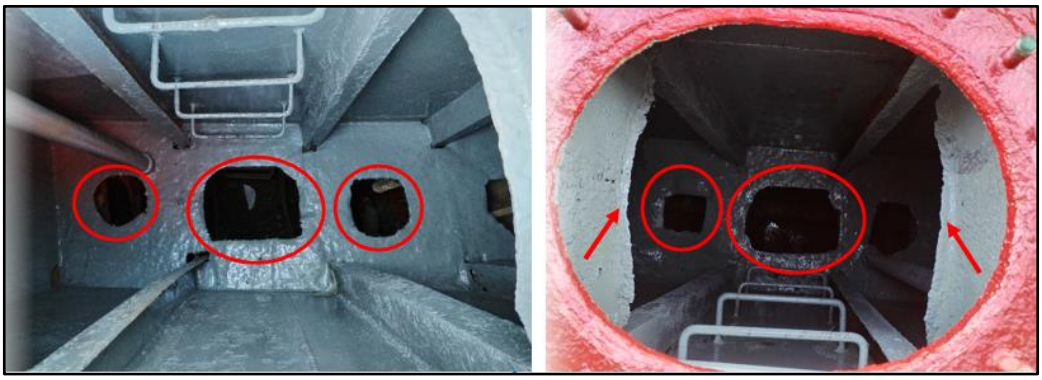

Figure 6 – View of the de-shaped and thinned tank structures in two ballast tanks painted over
(*Source*: the crew of SS taken in August 2024, annotated by TSIB)

1.6.4 The Master recalled[21] that he made a report of the broken air vent to the Company on the occurrence day through WhatsApp[22] call, however, the Master was told to continue the voyage to the STS transfer location. The Company informed the Master that the repair of the broken air vent would be arranged when SS completed its STS operations and returned to Port Klang.

1.6.5 After the sinking occurrence, SS was deregistered from SCM's classification list.

## 1.7 Environmental condition

1.7.1 At the time of the occurrence, there was north-easterly moderate to fresh breeze of about 11-20 knots (Beaufort wind force 4 - 5), the sea condition was moderate with swell heights at about 1.5- 2.5m. The sky was overcast but the visibility was more than 6nm.

[21] This statement could not be verified as the Company was not providing and verifying the information.
[22] A social media application used for communication such as instant messaging and voice calls.

## 2 ANALYSIS

### 2.1 Sinking of SS

2.1.1 The contributing factors for the port listing and subsequent sinking of SS were mainly due to the following:

a) Seawater getting on port side deck due to the low freeboard (less than 1m);

b) Water ingress into the port ballast tank (no.3 or no.4) due to the broken air vent head located on the port side deck;

c) Water ingress into engine room through the hole of the corroded drain pipe located at the port side hull near the aft part of the engine room; and

d) Moderate sea swells (about 1.5-2.5m height) causing more seawater onto port side deck and into the port ballast tank and engine room.

2.1.2 The inoperative ballast pump could not be used to correct the port listing situation, and the situation exacerbated when the main engine of SS experienced intermittent overspeed when its propeller was riding on sea swells in and out of water. SS eventually lost its propulsion when the generators failed which also resulted in the loss of electrical power and steering and resulted in SS's status becoming NUC.

### 2.2 Fitness for sea voyage

2.2.1 SS was licensed to operate in Port Klang as a bunker tanker about a half year prior to the occurrence, she was also certified to leave Port Klang trading in coastal areas as in this occurrence. However, she had never been operated for more than 24 hours continuously in the past six months before the coastal voyage.

2.2.2 Though SS passed the intermediate survey carried out by SCM in April 2024 for endorsing the Cargo Ship Safety Construction Certificate, as well as SCM's verification audit conducted in October 2024 for the issuance of SMC for safety management compliance, the hull and equipment conditions onboard SS seemed to be unfit for the intended coastal voyage with the following

observations from the ship's crew:

a) The corroded drain pipe was not addressed before the voyage commencement, which caused the engine room flooding. The Wilden pump could not cope with the continuous seawater ingression, and the leak from the corroded pipe could not be resolved temporarily by clamping or welding.

b) Poor condition of the air vent head on port side deck, which was broken.

c) Inoperative ballast pump which could not be used to adjust the ballast to correct the port listing.

d) One of the two generators was under-performing and would trip when the electrical load was above 70% of its designed capacity. Though the other generator functioned normally and was capable of providing output of its designed capacity, it failed during the challenging voyage.

2.2.3 It is the Company's responsibility to ensure its vessels are in seaworthy condition and fit to be put into service, especially for a vessel used for trading in an open sea environment. Any defects should be addressed in a timely manner before the coastal voyage.

2.2.4 The ship's crew, knowing the defects of the vessel, should have highlighted to the Company for the defects to be rectified before the commencement of the coastal voyage.

2.3 Master's overriding authority

2.3.1 When the Master reported to the Company of the broken air vent head which was causing water ingression into the ballast tank and deteriorating the port listing of SS, the Master did not exercise his overriding authority, as written in the SMS, to terminate the voyage but acceded to the Company's arrangement for the broken air vent head to be repaired after the coastal voyage. This appears to be an ineffective implementation of SMS onboard SS.

2.3.2 The Master, being the person on site, was in a better position to assess if the vessel was safe to continue the voyage. This is the reason for the SMS to accord overriding authority to a master. The Company, on the same note, should have taken the assessment of the Master seriously and terminated the voyage.

2.4 Inadequate ship maintenance

2.4.1 SS had undergone dry-docking in February-March 2024. Based on the account of the ship's crew, the condition of the mid floor structures of ballast tanks were corroded and de-shaped. Though these defects did not contribute to the sinking occurrence, they were of concerns to the adequacy of ship maintenance.

2.4.2 The last internal audit conducted onboard SS by the Company was on 26 February 2024, which found no deficiency. Though these defects and other observations on SS' hull and equipment may not have been discovered during the internal audit or could have deteriorated after the audit, the ship's crew including the Master should have brought these defects to the attention of the Company and have them rectified before the coastal voyage.

## 3 CONCLUSIONS

*From the information gathered, the following findings are made. These findings should not be read as apportioning blame or liability to any particular organisation or individual.*

3.1 The contributing factors for the port listing and subsequent sinking of SS was mainly due to its low freeboard which caused seawater ingress into the port ballast tank (no.3 or no.4) through the broken air vent. The leak from the hole of a corroded drain pipe in the engine room had also caused seawater to ingress into the engine room**.**

3.2 The inoperative ballast pump could not be used to correct the port listing.

3.3 The failure of the two shipboard generators and the loss of propulsion and steering exacerbated the situation and resulted in SS's status becoming NUC.

3.4 The defects of the hull and equipment observed by ships' crew suggested that SS was not fit for the intended coastal voyage. These defects were not rectified before commencement of the coastal voyage.

3.5 The Master did not exercise his overriding authority as stated in the Company's SMS procedures to terminate the coastal voyage knowing the defects were affecting the safety of the crew and vessel, and acceded to the Company's instruction to continue the voyage and to have the defects rectified after the voyage.

3.6 Based on ship's crew account, the condition of the mid floor structures of ballast tanks were corroded and de-shaped. These defects were not addressed during dry-docking, nor any follow-up repairs were carried out, suggesting a possibility of inadequacy in ship maintenance.

## 4 SAFETY ACTIONS

4.1 There was no information on safety actions taken provided to the investigation team by relevant stakeholders at the time of publishing the report.

## 5 SAFETY RECOMMENDATIONS

*A safety recommendation is for the purpose of preventive action and shall in no case create a presumption of blame or liability.*

For the ISM Manager (Peninsular Marine SDN. BHD.):

5.1 To ensure its fleet of vessels are fit for the intended coastal voyage. [TSIB Recommendation RM-2025-012]

5.2 To ensure effective implementation of its Safety Management System procedures, including master's overriding authority for the safety of crew and vessel. [TSIB Recommendation RM-2025-013]