Report of the 2023 Concentrated Inspection Campaign (CIC) on Fire Safety





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Executive Summary

The Paris Memorandum of Understanding (Paris MoU) on Port State Control (PSC) carried out a Concentrated Inspection Campaign (CIC) on Fire Safety in collaboration with the Tokyo 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 Maritime Authorities of the Paris MoU.

A Concentrated Inspection Campaign (CIC) on Fire Safety was conducted in view of an annual recurrence of a high number of deficiencies related to fire safety.

A CIC questionnaire was devised and approved by the Paris 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 considered an inspection item for PSC inspections. During the CIC, a total of 3856 inspections were carried out with the questionnaire. The CIC-topic detention rate in the period was 3.9% (151 ships were detained).

Of the CIC related detentions, the highest number of ships detained were Comoros and Marshall Islands Flagged (5 each) followed by Togo and Antiqua and Barbuda (4 each).

Of the Paris MoU member Authorities, the United Kingdom reported the highest number of CIC related deficiencies (251) followed by Italy (228) and Belgium (199). Italy detained the highest number of ships for CIC-related deficiencies (86). 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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Table of Contents

Introduction

- 1.1 Purpose of this report
- 1.2 Objective of the CIC
- 1.3 Scope of CIC
- 1.4 General Remarks

Summary, Conclusions and Recommendations

- 2.1 Summary
- 2.2 Conclusions
- 2.3 Recommendations

CIC Questionnaire Results

- 3.1 Analysis
 - 3.1.1 Response to CIC questionnaire
 - 3.1.2. Analysis of answers to questionnaire in relation to detention
 - 3.1.3. Analysis of CIC-topic related deficiencies, including ISM related deficiencies
 - 3.1.4. Number of inspections in CIC
 - 3.1.5 Specification of CIC-topic related deficiencies
 - 3.1.6 Number of inspected ships per Ship Risk Profile
 - 3.1.7 Number of inspected ships and detentions per ship type
 - 3.1.8 Inspections and detentions per Flag State
 - 3.1.9 Ship age overview

Annex 1

Annex 1.1 CIC Questionnaire

Annex 1.2 Inspections and detentions per Flag State



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) SOLAS Fire Safety Systems Code (FSS).

1.3 Scope of CIC

The CIC was to be applied to all ships targeted for inspection within the Paris 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.

Paris MoU member Authorities were provided with a standardized questionnaire format to record and report their results against the 10 targeted questions that comprised the CIC. PSCOs were required to indicate if the ship was detained as a result of the CIC. For each "No" answer, PSCOs were directed to document the deficiency using the appropriate deficiency code on Form B of the PSC inspection report. Further, PSCOs were directed to use "N/A" should the question not be applicable to the ship and consequently the question could not be answered.

1.4 General Remarks

- For the purpose of this report, a detention is an inspection containing at least one deficiency in the area of the CIC that is considered a ground for detention.
- 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 following summarizes the results of the CIC:

- ➤ 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 99.8% 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, 99.3% responded 'yes'. Notably, when comparing Questions 5 and 6 even though compliance was high for Question 6 it resulted in 12 detentions compared with 0 detentions for question 5.
- With the exception of Question 2− Fire Doors and Question 10 Fire Drill there was a high compliance rate averaging 98.2%. Question 2 − Fire Doors had the lowest rate of compliance at 90.75%, just 0.1% less than Question 10 − Fire Drills. Notably, however, Question 10 on Fire Drills had a higher rate of detentions at 1.3% compared to Question 2 − Fire Doors at 0.9%.



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- The least compliance was noted concerning Question 2, whether fire doors are maintained in good working condition. On this question, 9.3% responded 'no'.
- As it relates to areas of low compliance, question 10 followed very closely with 9.2% responding 'no' with respect to when a fire drill was witnessed, was it found to be satisfactory. Notably, Question 10 also had the highest "n/a" response at 24.4%, it is assumed this could be due to fact that operational drills are not required for an initial inspection, despite the FAQ advising that the drill should be done on all inspection types.
- The overall detention rate based on total CIC inspections was 3.6%.
- 215 vessels with deficiencies marked as grounds for detention were in the Standard Risk category.
- ➤ By ship type, as in previous years, General cargo/multipurpose ships has highest CIC-topic detention rate (41.4%) followed by bulk carrier (24.9%) and oil tanker (7.3%).
- ➤ 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 (37.9%).
- The flag State with highest number of CIC related deficiencies was Panama (291) followed by Liberia (242), Marshall Islands (186) and Antigua and Barbuda (100).
- > Ships with CIC related grounds for detention, the highest number of detentions, by flag State, were Comoros and Marshall Islands with (5) each, followed closely by Antiqua and Barbuda and Togo with (4) each. Tanzania and United Arab Emirates with (2) each and eight other flag States with (1) CIC topic-related detention.
- The Flag administrations which had CIC topic detentions were a mix of White, Grey, Black and not listed in the Paris 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 9.3%, 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 9.2%.

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.



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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.

CIC Questionnaire Results

3.1 Analysis

The CIC was carried out between the period of 1 September to 30 November 2023. A total of 4005 inspections of these 3856 completed a CIC questionnaire.

There were 149 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 941 in relation to Question 10 – Fire Drills. It is assumed that this was due to completion of Initial Inspections during the CIC period whereby operational drills are not mandatory. The second highest N/A's (287) 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 "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."

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

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

For the 3856 inspections using the questionnaire the results are divided into "Yes", "No", "N/A", "Blank" and 'Detained'.

		nr Yes	"/Total Y+N"	nr No	"/Total Y+N"	nr N/A	"/Line Total Insp"	Nr Blank	"/Line Total Insp"	Nr Detained	"Dets/Total Q CIC"
		Measu	red over No ans	-	es and		Measur	ed over	Total of	CIC Inspec	ctions
Nr.	Nr. CIC on Fire Safety		S'(1)	'N	O'(1)	N	'A(2)	Blar	nk(2) Detained		ained
		#	%	#	%	#	%	#	%	#	% of CIC
1*	Are the emergency escape routes maintained in a safe condition?	3,692	96.8%	122	3.2%	42	1.1%	-		10	0.3%
2*	Are fire doors maintained in good working condition?	3,453	90.7%	355	9.3%	48	1.2%	-		34	0.9%
3*	Has the fixed fire detection and fire alarm systems, been periodically tested in accordance with the requirements of the Administration?	3,719	97.8%	82	2.2%	55	1.4%	-		16	0.4%
4*	Are ventilation closing appliances capable of being closed?	3,667	96.2%	143	3.8%	46	1.2%	-		17	0.4%
5*	Are the means of control for power ventilation of machinery spaces operable from two grouped positions?	3,740	99.8%	9	0.2%	107	2.8%	-			
6*	Can each fire pump deliver at least the two required jets of water?	3,727	99.3%	28	0.7%	101	2.6%	-		12	0.3%



		nr Yes	"/Total Y+N"	nr No	"/Total Y+N"	nr N/A	"/Line Total Insp"	Nr Blank	"/Line Total Insp"	Nr Detained	"Dets/Total Q CIC"
		Measu	red over No ans	-	es and		Measur	ed over	Total of	CIC Inspec	ctions
Nr.	Nr. CIC on Fire Safety		S'(1)	'NO'(1)		N/A(2)		Blank(2)		Detained	
		#	%	#	%	#	%	#	%	#	% of CIC
7*	Are the means of control provided in a position outside the machinery space for stopping ventilation and oil transfer equipment operational?	3,732	98.9%	40	1.1%	84	2.2%	ı		8	0.2%
8*	Is the room for the fixed gas fire extinguishing medium used only for this purpose?	3,541	99.2%	28	0.8%	287	7.4%	-		1	0.0%
9*	Are the valves used in the fire main line operational?	3,710	97.8%	82	2.2%	64	1.7%			15	0.4%
10*	Where a fire drill was witnessed, was it found to be satisfactory?	2,646	90.8%	269	9.2%	941	24.4%	-		51	1.3%

^{*} If the answer to this question is 'NO' the ship may be considered for detention, in case of a Detention, "No" is replaced with "Detained", the score of "Detained" is added to the "NO" scores (In Thetis just 1 answer is possible). 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

Question 10 – Where a fire drill was witnessed – was it found satisfactory, had the second highest number of "No" answers (269) although highest number of detentions 51 (1.3%).

Question 2 – fire doors maintained in good working condition, followed with 34 detentions (0.9%) along with highest number of "No's" (355). 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 99.8%, with no 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, including ISM related deficiencies

The data extract for this report did not specify which deficiencies were ISM related.

The number of deficiencies recorded against each deficiency code for the period of the CIC shows an increased focus being placed on the particular areas of the CIC when compared with 2022.

The comparison of the data for 2022 and for 2023 shows that whilst there was an increased focus in the area of the CIC in 2023, PSCOs inspect these areas during routine PSC inspections.

3.1.4. Number of inspections in CIC

Table 2 Number of inspections and number of ships in CIC

	INSPECTIONS WITH* A CIC QUESTIONNAIRE	INSPECTIONS WITHOUT A CIC QUESTIONNAIRE
TOTAL	3,856	149
DETENTIONS	151	-
DETENTIONS WITH CIC-TOPIC RELATED DEFICIENCIES	151	-

^{*} Conform the questionnaire 2023 there are 140 related detentions recorded instead of 151 recorded in Thetis.

Be aware that "with a CIC" does not means related to a CIC.



3.1.5 Specification of CIC-topic related deficiencies

Table 3 Specification of CIC-topic related deficiencies

	CIC-topic related deficiencie	# of deficiencies, (One inspection can have multiple deficiencies)		#of deficiencies recorded as ground for detention		# of deficiencies recorded as RO related		
	Deficiency	Convention	2022	2023	2022	2023	2022	2023
4103	Emergency, lighting, batteries and switches	SOLAS ch. II-1 Parts C, D, E, F	148	154	12	11	2	1
4109	Fire drills	SOLAS ch. III	94	121	29	25	-	-
7105	Fire doors/openings in fire-resisting divisions	SOLAS ch. II-2	337	434	35	45	2	4
7106	Fire detection and alarm system	SOLAS ch. II-2	128	199	20	29	2	4
7109	Fixed fire extinguishing installation	SOLAS ch. II-2	89	156	21	23	2	3
7110	Fire fighting equipment and appliances	SOLAS ch. II-2	130	180	17	28	5	6
7113	Fire pumps and its pipes	SOLAS ch. II-2	68	96	12	14	2	2
7114	Remote Means of control (opening,pumps,ventilation,etc.) Machinery spaces	SOLAS ch. II-2	86	111	29	22	2	7
7116	Ventilation	SOLAS ch. II-2	54	129	7	13	1	2
7120	Means of escape	SOLAS ch. II-2	105	155	16	10	1	1
7125	Evaluation of crew performance (fire drills)	SOLAS ch. II-2	84	178	26	41	-	-



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3.1.6 Number of inspected ships per Ship Risk Profile

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 Standard Risk. However, looking at the overall number of inspections they make up the majority of the inspections, so this is considered proportional.

Table 4 Number of inspected ships per Ship Risk Profile

	Based on Inspections with CIC related deficiencies in Months 9/10/11									
CIC-topic related deficiencies	Nr. CIC deficie		Nr. CIC deficion recorded for def	encies as ground	Nr. CIC related deficiencies recorded as RO related					
Ship risk profile	2022	2023	2022	2023	2022	2023				
HRS	208	287	54	46	7	5				
SRS	1,079	1,604	168	215	12	25				
LRS	19	8	-	-	-	-				
UNKNOWN	17 14 2									



3.1.7Number of inspected ships and detentions per ship type

General Cargo/multipurpose ships had the highest number of CIC related deficiencies and CIC related deficiencies recorded as grounds for detention (632/108) followed by Bulk carrier (478/65).

Table 5

	Based on Inspections with CIC related deficiencies in Months 9/10/11							
CIC-topic related deficiencies	Nr. CIC deficie		deficienc	C related ies recorded d for detention	Nr. CIC related deficiencies recorded as RO related			
Ship Type	2022	2023	2022	2023	2022	2023		
Bulk carrier	344	478	47	65	2	2		
Chemical tanker	48	57	2	7	-	-		
Commercial yacht	3	-	-	-	-	-		
Container	98	107	9	7	-	-		
Gas carrier	9	56	- 8		-	1		
Gas Carrier/NLS tanker	1	1			•	•		
General cargo/multipurpose	452	632	129	108	14	21		
Heavy load	4	7	1	-	1	-		
NLS tanker	2	3	-	-	-	-		
Offshore supply	23	27	-	-	-	-		
Oil tanker	88	102	10	19	2	4		
Other	84	154	12	13	•	•		
Other special activities	18	33	2	4	-	-		
Passenger ship	9	11	-	-	-	-		
Refrigerated cargo	8	42	-	7	-	-		
Ro-Ro cargo	41	90	6	14	•	2		
Ro-Ro passenger ship	78	88	3	4	-	-		
Special purpose ship	5	8	1	-	-	-		
Tug	8	17	2	5	•	-		



3.1.8 Inspections and detentions per Flag State

The flag State with highest number of CIC related deficiencies was Panama (291) followed by Liberia (242), Marshall Islands (186) and Antiqua and Barbuda (100).

Ships with CIC related grounds for detention highest numbers were Comoros and Marshall Islands (5) each followed closely by Antigua and Barbuda and Togo (4) each.

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 PMOU WGB list.

3.1.9 Ship age overview

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

Table 6

	Based on Inspections with CIC related deficiencies in Months 9/10/11										
CIC-topic related deficiencies	Nr. CIC defici	related encies			Nr. CIC related deficiencies recorded as RO related						
Ship Age Group	2022	2023	2022 2023		2022	2023					
00 – 06	28	67	-	-	-	-					
07 – 12	244	277	17	17 21		1					
13 – 18	509	720	102	99	8	5					
19 – 24	212	314	25	45	2	6					
25 – 30	132	279	21	46	1	9					
31 – 36	98	133	30	28	1	1					
37 ∞	100	123	29	29 22		8					



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Annex 1.1 CIC Questionnaire

QUESTIONNAIRE CONCENTRATED INSPECTION CAMPAIGN ON FIRE SAFETY PMoU/TMoU

Ship's name	
IMO No.	
Date of Inspection	

QUESTIONS 1 TO 10 ANSWERED WITH A "NO" $\underline{\text{MUST}}$ BE ACCOMPANIED BY A RELEVANT DEFICIENCY ON THE REPORT OF INSPECTION.

No.	Questions	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)				_

If "No" is ticked for questions marked with an asterisk "*", the ship may be considered for detention



Annex 1.2 Inspections and detentions per Flag State

	Based deficier						
CIC-topic related deficiencies		encies	Nr. CIC related deficiencies recorded as ground for detention		Nr. CIC related deficiencies recorded as RO related		Current position on WGB list
Ship Flag	2022	2023	2022	2023	2022	2023	
Albania	5	1	4	-	-	-	Black
Algeria	20	3	6	-	-	-	Black
Antigua and Barbuda	58	100	10	11	-	4	White
Azerbaijan	6	2	6	1	-	1	Grey
Bahamas	39	57	7	6	-	-	White
Bangladesh	1	6	-	-	-	-	Not Listed
Barbados	31	35	4	2	1	-	White
Belgium	-	5	-	-	-	-	White
Belize	11	15	4	2	-	-	Grey
Bermuda, UK	2	1	-	-	-	-	White
Brazil	-	3	-	-	-	-	Not Listed
Cameroon	16	15	11	5	2	-	Black
Cayman Islands, UK	3	_	_	_	-	-	White
China	2	7	_	_	_	-	White
Comoros	12	19	2	8	_	5	Black
Cook Islands	8	1	3	-	_	_	Grey
Croatia	4	8	3	_	_	_	Grey
Curacao	2		1	_	1	_	Not Listed
Cyprus	70	95	7	8	1	_	White
Denmark	10	21	1			_	White
Dominica	-	2	_	_	_	_	Not Listed
Egypt	_	2	_	_	_	_	Grey
Estonia	_	3	_	_	_	_	White
Ethiopia	1		1	_	_	_	Not Listed
Faroe Islands	11	11	1		_	_	White
Finland	4	10	<u> </u>		_		White
France	1	4	_	_	_	_	White
Gabon	1			-	_	_	Not Listed
		1	_	<u>-</u>	_	_	Not Listed
Gambia Germany	17	31	<u>-</u> 1	4	-	-	White
Gibraltar, UK	13	16	2	4	2	-	White
				-		-	
Greece Guinea-Bissau	8	32	-	4	-	-	White
	-		-	-	-	-	Not Listed
Hong Kong (China)	31	25	3	-	-	-	White
India	4	-	-	-	-	-	Grey
Indonesia	-	20	-	7	-	1	Not Listed
Ireland	1	- 7	-	-	-	-	White
Isle of Man, UK	6	7	2	-	-	-	White
Italy	14	26	-	-	-	-	White
Japan	2	7	-	-	-	-	White
Jordan	6	-	-	-	-	-	Not Listed
Korea, Republic of	8	6	1	-	-	-	Grey
Latvia	5	14	-	-	-	-	White



	Based (on Inspe	ctions w	ith CIC r	elated		
			Months 9				
CIC-topic related deficiencies	Nr. CIC deficie	related encies	deficion record grour dete	Nr. CIC related deficiencies recorded as ground for detention		related encies ed as RO ted	Current position on WGB list
Ship Flag	2022	2023	2022	2023	2022	2023	
Lebanon	3	3	-	-	-	-	Grey
Liberia	175	242	19	34	-	1	White
Lithuania	2	2	-	-	-	-	White
Luxembourg	1	6	-	-	-	-	White
Malta	78	111	12	8	2	1	White
Marshall Islands	114	186	16	22	-	5	White
Mexico	1	-	-	-	-	-	Not Listed
Mongolia	1	1	-	1	-	-	Not Listed
Netherlands	28	88	-	1	-	1	White
Norway	34	65	1	-	-	-	White
Palau	14	34	1	10	-	-	Grey
Panama	231	291	62	66	3	1	Grey
Philippines	14	1	4	-	-	-	Grey
Portugal	53	68	7	9	3	-	White
Russian Federation	2	5	-	2	-	-	White
Saint Kitts and Nevis	7	5	2	-	-	-	Grey
Saint Vincent and the Grenadines	6	4	-	-	-	-	Grey
Saudi Arabia	1	-	-	-	-	-	Grey
Seychelles	-	1	-	-	-	-	Not Listed
Sierra Leone	4	7	_	_	-	-	Black
Singapore	41	44	-	9	-	-	White
Spain	5	2	-	-	-	-	White
Sweden	-	15	-	-	-	-	White
Switzerland	2	1	2	-	2	-	Grey
Tanzania, United Republic of	5	19	2	9	-	2	Black
Thailand	-	4	-	-	-	-	White
Togo	15	11	7	6	2	4	Black
Tunisia	3	6	-	-	-	-	Not Listed
Türkiye	19	17	2	-	-	-	White
Ukraine	-	1	-	-	-	-	Grey
United Arab Emirates	-	3	-	3	-	2	Not Listed
United Kingdom	10	22	1	8	-	1	White
United States	1	1	-	-	-	-	White
Vanuatu	12	29	6	15	-	1	Black
Viet Nam	8	3	-	-	-	-	Not Listed