



## Is your PMS keeping pace with manufacturer updates?

Failure to review and incorporate instructions and recommendations from manufacturers' service letters into the Planned Maintenance Systems (PMS) can place crews and ships at unnecessary risk.

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Over the years Gard has handled numerous claims related to engine damage that could have been avoided if the instructions and recommendations in manufacturers' service letters had been properly reflected in ships' PMS. In some cases, service letters were not distributed to all relevant ships in the fleet. In others, the letters were shared but lacked clear company instructions on how the required or recommended changes should be implemented and monitored, meaning the tasks were never added to the PMS.

Not acting on manufacturers' instructions can have serious and costly consequences. It may also compromise insurance coverage. Therefore, ship operators must ensure that all service letters are received, systematically reviewed, assessed, and that all relevant and safety critical instructions and recommendations are incorporated into the PMS for each applicable ship. Additionally, follow-up actions should be monitored and controlled through the ship's Safety Management System (SMS).

## Case examples

In one case, engine damage was traced to improperly tightened connecting rod bolts. The investigation revealed that the engine manufacturer's required retightening check after 200 hours of operation had not been carried out, because the instruction, issued in a service letter, had not been incorporated into the ship's PMS. The investigation concluded that performing the retightening would most likely have prevented the engine breakdown.

In another case, an auxiliary engine suffered a piston fatigue failure just 120 running hours after a routine overhaul. The investigation showed that the ship operator had not updated the PMS to include instructions and procedures issued in a service letter at least one year prior to the incident. The resulting repair costs exceeded USD 130,000.

Failure to follow manufacturer instructions can result in consequences far more severe than repair costs and downtime. An investigation into an engine room fire, caused when fuel leaked from a main engine fuel system and ignited on a hot surface, revealed that the engine manufacturer had previously issued a recommended modification to address known fuel system leakage for this engine type. This modification, however, had not been applied to the engine in question. Although missing and damaged protective shielding, exposing high-temperature surfaces, contributed to the ignition, the fire would not have occurred if the fuel leak itself had been prevented.

## Regulatory requirements

The IMO ISM Code states that: “*Every Company should develop, implement and maintain a Safety Management System (SMS) which includes [...] instructions and procedures to ensure safe operation of ships and protection of the environment in compliance with relevant international and flag State legislation*” (ISM Code Section 1.4).

The Code also specifies that the Company should: “*establish procedures to ensure that the ship is maintained in conformity with the provisions of the relevant rules and regulations and with any additional requirements which may be established by the Company*” (ISM Code, Section 10).

In addition, the STCW framework includes maintenance and repair competencies within its mandatory training and certification standards for engineering and technical roles.

Classification societies similarly require ships to carry out regular maintenance in accordance with a ship-specific PMS. To ensure compliance with class rules, maintenance tasks should be predefined, performed, and documented in line with recognised industry standards or the procedures recommended by the original equipment manufacturer (OEM), with appropriately qualified personnel assigned to execute them. However, despite the mandatory STCW requirements, seafarers’ ability to perform these maintenance and repair tasks safely and effectively ultimately depends on meeting OEM training requirements.

It is also worth noting that if a manufacturer’s service letter concerns a safety-critical issue or is linked to regulatory requirements, port state control may request evidence of its implementation, such as maintenance records, work orders, inspection reports, or class confirmation.

## **Summary and recommendations**

The case examples above highlight the critical importance of ship operators having robust procedures to manage and review manufacturers’ service letters and ensure safety-critical instructions and recommendations are fully implemented onboard. Doing so not only supports compliance with the ISM Code but also helps prevent avoidable engine failures and ensures that the ship’s insurance coverage is not jeopardized.

The following key points should be considered:

**Assign responsibility for service letters** : Designate specific personnel or roles to ensure that all manufacturers' service letters are received, reviewed promptly, assessed for relevance and criticality, and communicated to all applicable vessels in the fleet. Include any additional recommendations from managers in the handover notes for onboard senior management to ensure accountability and follow-up.

**PMS integration** : Add all relevant instructions and recommendations to the ship's PMS with clear tasks, deadlines, and assignment to personnel with the required qualifications.

**Follow-up and verification** : Monitor the completion of tasks through the ship's SMS and confirm that actions have been properly executed.

**Management changes** : In the event of a change in the ship's technical management or shipowner, contact manufacturers to confirm that the PMS reflects the latest service letters, instructions, and recommendations.

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