

Isle of Man Ship Registry Port State Control

Information Notice 3-2020

Issued Oct 2020

The purpose of this notice is to advise Managers and Masters of information concerning Port State Control inspections and activities affecting Isle of Man ships worldwide.

A Port State Control (PSC) inspection is a right of a PSC authority to check visiting foreign ships in order to verify compliance with international rules on safety, pollution prevention and seafarer's living and working conditions.

PSC is a means of enforcing compliance in cases where the ship-owner and Flag State have failed in their responsibility to implement or ensure compliance. Thus, the aim of PSC is the elimination of "sub-standard" ships. The Port State authority can require defects to be put right, and if necessary, detain ships for this purpose. PSC is therefore a port state's defence against visiting substandard shipping.

Technical managers are encouraged to forward this notice to Masters of Isle of Man registered ships in their fleet.

Isle of Man Ship Registry – marine.survey@gov.im – happy to help.

For questions concerning statutory requirements relating to Isle of Man registered ships please email Isle of Man Ship Registry. This email is monitored continuously and the survey team will endeavour to respond as soon as possible.

Whenever a PSC inspection has been completed, we kindly ask you to email all PSC inspection reports to [Isle of Man Ship Registry](#) as soon as practicable.

Isle of Man COVID19 guidance – refer to [Technical Advisory Notice 02-2020](#) (General, Seafarer's Certification and Minimum Safe Manning, MLC Implications, Survey & Certification, FAQs)



Important note concerning Seafarer Employment Agreements (SEAs)

During the COVID19 pandemic seafarers are facing increasing difficulties with repatriation and as such may be asked to extend their period of service on board. As a result SEAs, as required by the Maritime Labour Convention, are coming under increased scrutiny by PSC.

Some PSC regions and authorities will not accept extension of the period of service on board beyond the default 11 months unless authorized (*authorized by Isle of Man Ship Registry*) on a case-by-case basis when strictly necessary to face the emergency situation created by the pandemic and only with the seafarer's consent.

Please refer to Isle of Man [Technical Advisory Notice 02-2020 Section 4.2](#) and applicable PSC regional COVID19 guidance notes (see web links in section 1 of this document).



Guidance for Masters should you receive a deficiency during a PSC inspection.

If you agree with the deficiency raised then agree a practical corrective action plan with the PSC Officer. This should be reflected in the deficiency's "action taken" coding stated on the Form B.

If you do not agree with the deficiency raised then challenge the PSC officer before he/she leaves the vessel to clarify the statutory requirement and its implementation on board. Rectification later is usually much more difficult to achieve. Most PSC Officers expect to be challenged by the Master.

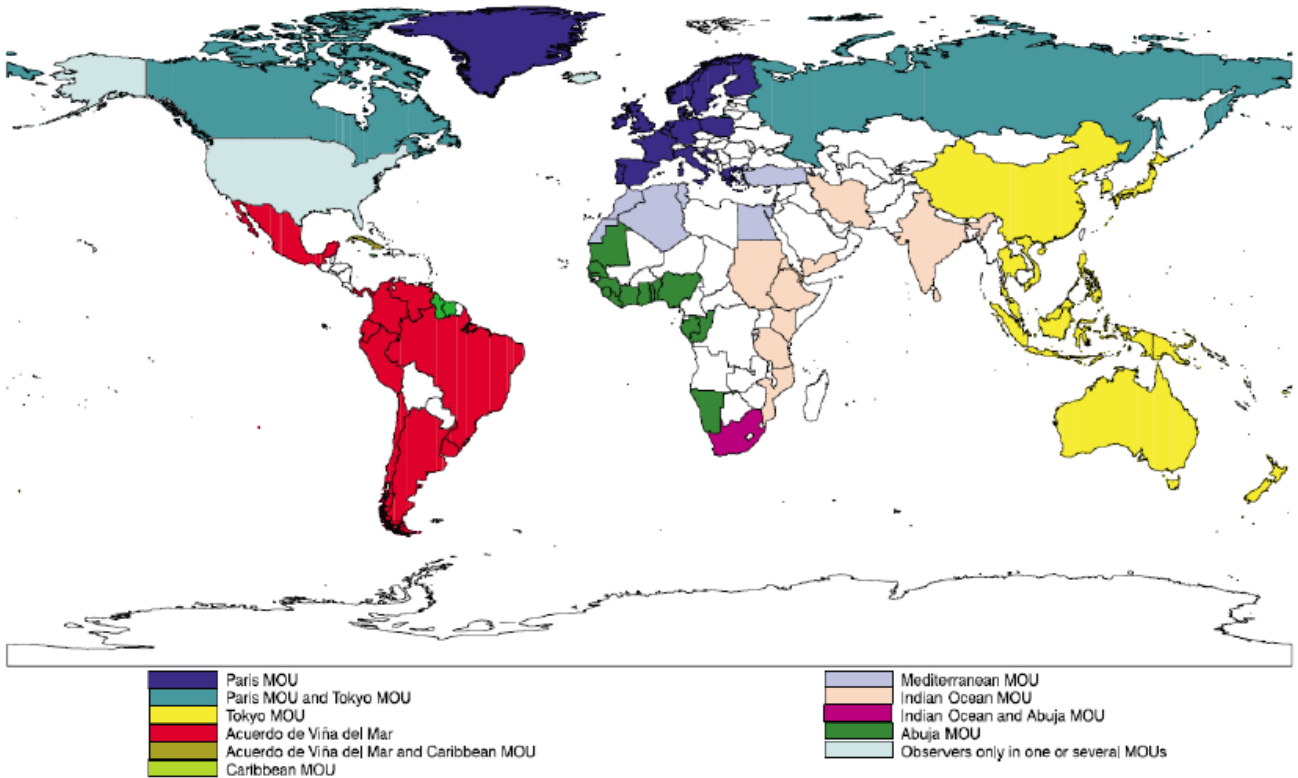
In addition to the above, if the PSC Officer wishes to **detain** the vessel;

- Call the technical management company or Isle of Man Ship Registry (+44 1624 688500 office hours or +44 7624 493467 out of hours) for assistance if required **before the PSC Officer leaves the vessel.**
- Ask the PSC Officer for a copy of the appeal procedure.





Port State Control Regions



Useful websites for PSC MoU (Memorandum of Understanding) Information:

Black Sea MOU	www.bsmou.org	Riyadh MOU	www.riyadh mou.org
Paris MOU	www.parismou.org	United States CG	cgmix.uscg.mil/PSIX
Indian MOU	www.iomou.org	Latin America MOU	www.acuerdolatino.int.ar
Mediterranean MOU	www.medmou.org	Caribbean MOU	www.caribbeanmou.org
Tokyo MOU	www.tokyo-mou.org	West and Central Africa MOU	www.abujamou.org



Remember...

- All statutory equipment on board must be maintained in full working order capable of being used and demonstrated at any time regardless if it is being used for operations or not.
- If you are aware of any defects or equipment failures concerning statutory equipment then address these through the ship's defect reporting system and inform the Flag State and Classification Society as necessary. Temporary dispensation from Isle of Man Ship Registry may be required to allow for repairs.
- Should a Port State Control Officer board the vessel the Isle of Man Ship Registry advises informing the PSC Officer of any defects at the beginning of the inspection and demonstrate what steps have been taken to address them.
 - If this is not done the PSC Officer may incorrectly assume the ship staff are either not aware of a deficiency item or are lying about it – either way this is bad for the ship.



1. Quarterly MOU Regional Information

Paris MoU:

- The Isle of Man has '**White List**' status as of the latest [2019 Paris MoU Performance List](#).
- Classification Societies recognised by Isle of Man (see MSN020) have [a low risk](#).
- [Paris MoU COVID19 Guidance](#)

Tokyo MoU:

- The Isle of Man has '**White List**' status as of the latest [2019 Tokyo MoU Annual report](#).
- In accordance with the Tokyo MOU's Inspection Regime procedures the Isle of Man also has "Low Risk Ship" status as published on the Tokyo MOU website.
- Classification Societies recognised by Isle of Man have a performance level of "High" and have also attained "Low Risk" status as published on the Tokyo MOU website.
- [Tokyo MoU COVID19 Guidance](#)

[2020 Safety Bulletins x3](#)

United States Coast Guard (USCG):

- The Isle of Man Ship Registry has achieved the required Flag State status for those ships wishing to enroll on the USCG's **Qualship 21** and **E-Zero** programs subject to additional eligibility criterion being met as of the latest [2019 USCG Annual Report](#).
- The Isle of Man Ship Registry has also achieved the required Flag State status for a low target score on the USCG Security Compliance Matrix as of the 2019 USCG Annual Report.
- Classification Societies recognised by Isle of Man have a detention ratio of <2% and are therefore not targeted for Priority 1 PSC inspections.
- [USCG COVID19 Guidance](#)

[2020 USCG Safety Alerts x5, Safety Advisory x1](#)

Black Sea MoU:

- [2019 Annual Report](#)

Indian Ocean MoU:

- [Indian Ocean MoU COVID19 Guidance](#)
- [2019 Annual Report](#)

Caribbean MoU:

- [Caribbean MoU COVID19 Guidance](#)
- [2019 Annual Report](#)

Riyadh MoU:

- [2019 Annual Report](#)

Abuja MoU:

- [2019 Annual Report](#)



2. PSC Detentions deficiencies (last 12 months) – All PSC MOU Regions

The following inspection areas represent deficiencies that resulted in detention on Isle of Man registered ships in the last 12-month period Q4 2019 – Q3 2020 (inclusive) in all MOU regions. The below does not represent the number of ships detained, in some cases a single item and in other cases multiple items have resulted in the ship's detention.

012 - Certificates & Documentation - Crew Certificate

Found 4 sailors who served on board already for a longer period than 14 months they joined the vessel. Their initial SEA's are expired and extensions were signed, however these extensions were expired the day before the PSC inspection. Found at least one other crew member with both initial SEA and extension expired. No plan for repatriation could be shown during inspection.

03 - Water/Weathertight condition

Fuel oil vent found with holes and several ballast tank air-vent closing arrangements found defective.

07 – Fire Safety

Several fire dampers found not closing properly.

10 – Safety of Navigation

Nautical publications were found not updated.

11- Life Saving Appliances

Freefall lifeboat release system found defective.

Hydrostatic Release Units (HRUs) for life-rafts found expired.

141 – MARPOL Annex 1

The oily water separator three-way valve was found not closing properly.

15 – ISM

The ship's ISM system for effective maintenance and defect reporting is not effectively implemented on board.

In cases of detention the ship is not permitted to sail until an effective action plan has been agreed with the local PSC authority.

2.1 Statutory equipment failure usually results in detention

All statutory equipment on board must be maintained in full working order capable of being used and demonstrated at any time regardless if it is being used for ship operations or not.

If you are aware of any statutory equipment failure then address through the vessel's defect reporting system, inform the Flag State and the Classification Society. Should the ship be subject to PSC inspection please inform the Port State Control Officer of statutory deficiencies at the beginning of the inspection and demonstrate what action is being taken to rectify the situation.

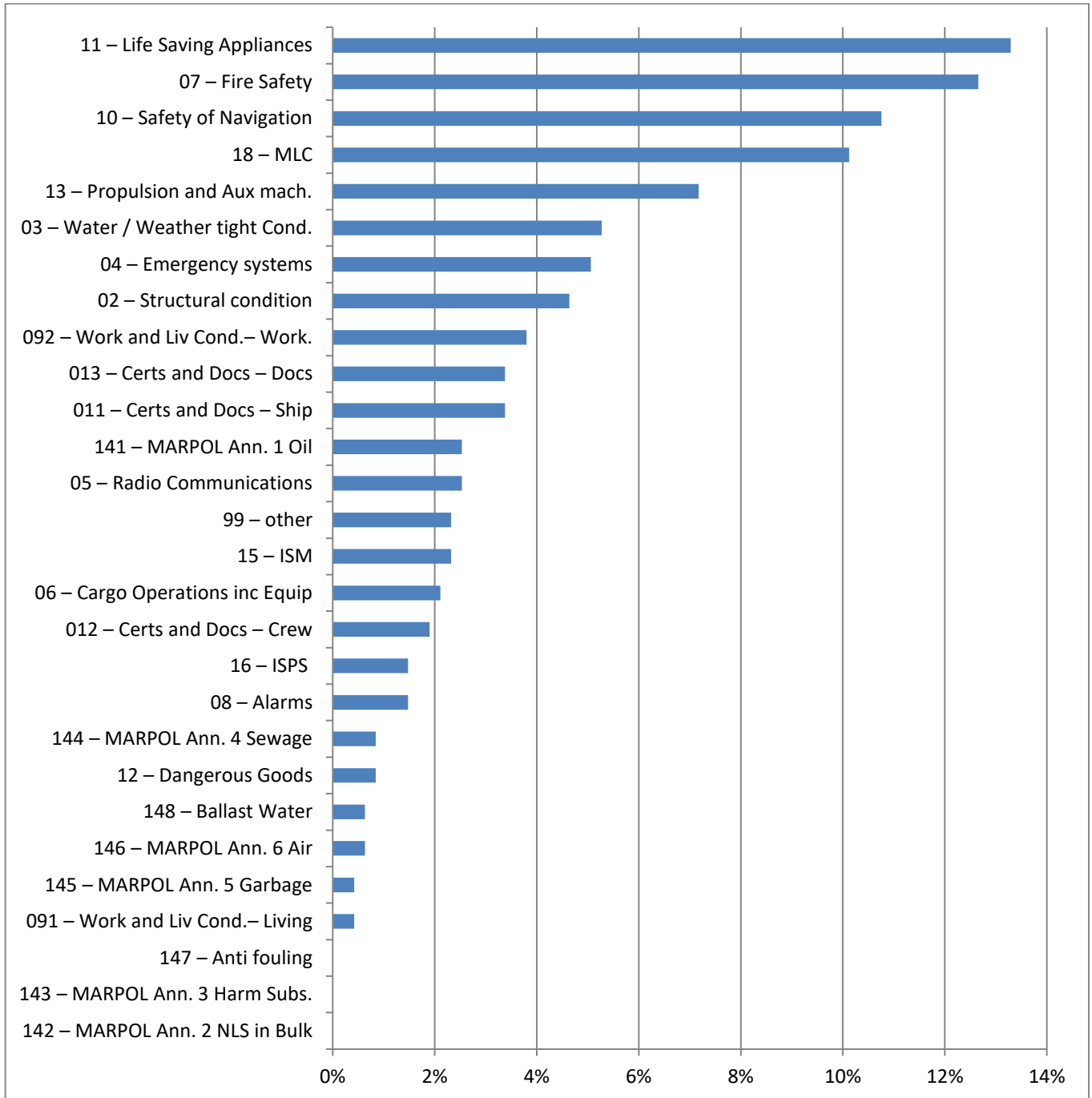
Where defective statutory equipment or documents has resulted in the ship's detention it is necessary for the Master or technical manager to inform Isle of Man Ship Registry.

If additional equipment has been fitted in excess of the statutory requirements the Isle of Man Ship Registry recommends this equipment is maintained in full working order or clearly signed the equipment is not to be used.



3. PSC Deficiencies (last 12 months) – All PSC MOU Regions

The following chart represents deficiencies requiring corrective action raised in all MOU Regions expressed as a percentage of the total deficiencies in the last 12-month period Q4 2019 – Q3 2020 (inclusive):



As part of the Isle of Man Ship Registry’s commitment to reducing Port State Control (PSC) deficiencies Isle of Man Ship Registry produces anonymous monthly statistics and information concerning PSC deficiencies issued per port in each of the different MOU Regions.

The monthly statistics are emailed to companies in .XLS format. (If you have not received this email please contact the IOM Ship Registry.)

The Isle of Man Ship Registry hopes that by sharing this information companies and masters can benefit from other ship’s experiences and avoid similar deficiencies being issued.



4. PSC Deficiencies by Code (last 12 months) – All PSC MOU Regions

The following table represents the most common deficiency items raised by code (Paris MOU deficiency coding system) with examples of deficiencies raised ($\geq 1.5\%$) in the last 12-month period Q4 2019 – Q3 2020 (inclusive) in all MOU regions. It is recommended masters and technical managers pay special attention for any defects on board in the areas identified.

%	Code	Deficiency Description
2.9%	11101	Lifeboats Release cable defective, fracture in rudder, fracture in hull, engine not starting correctly, door seals damaged.
2.7%	7199	Other (fire safety) Lagging missing, defective machinery filters, machinery oil leaks, IMO signage missing, quick closing valve defective, tank gauges defective, waste receptacles construction material not as required.
2.1%	10116	Nautical publications Required publications missing, publications not corrected, publications expired.
1.9%	3108	Ventilators, air pipes, casings Rubber gaskets missing, air vent closing arrangements defective, vent and air pipe excessive corrosion.
1.9%	7105	Fire doors/openings in fire-resisting divisions Fire door not latching closed, fire door held open, fire door not closing fully, fire door fitted with hold back device instead of self-release device.
1.9%	11104	Rescue boats Launching device found in poor condition, Electrics and lights defective, engine not starting correctly, water ejector found with a hole, air system defective, retroreflective material missing, light inoperative.
1.9%	18408	Electrical Electrical insulation missing, switches defective, light covers defective, earth cable detached.
1.7%	3102	Freeboard marks Loadline marks missing or not visible.
1.7%	13102	Auxiliary engine Generator under repair, lagging inadequate, fracture in generator, leak from water pump, oil leaks.
1.7%	15150	ISM Maintenance system and defect reporting system not implemented effectively, numerous deficiencies are indicative ISM system is not effectively implemented.

1.5%	6199	Other (cargo)
1.5%	11131	On board training and instructions
1.5%	13199	Other (machinery)
1.3%	1220	Seafarer Employment Agreement SEA
1.3%	2108	Electric equipment in general
1.3%	4103	Emergency lighting, batteries and switches
1.3%	7110	Fire fighting equipment and appliances
1.3%	7115	Fire-dampers
1.3%	10103	Radar
1.3%	10127	Voyage of passage plan
1.3%	16101	Security related defects
1.3%	99101	Other safety in general
1.1%	1308	Records of rest - Records of seafarer's daily hours of work or rest
1.1%	5114	Reserve source of energy
1.1%	10109	Lights, shapes, sound signals.
1.1%	11117	Lifebuoy including provision and disposition



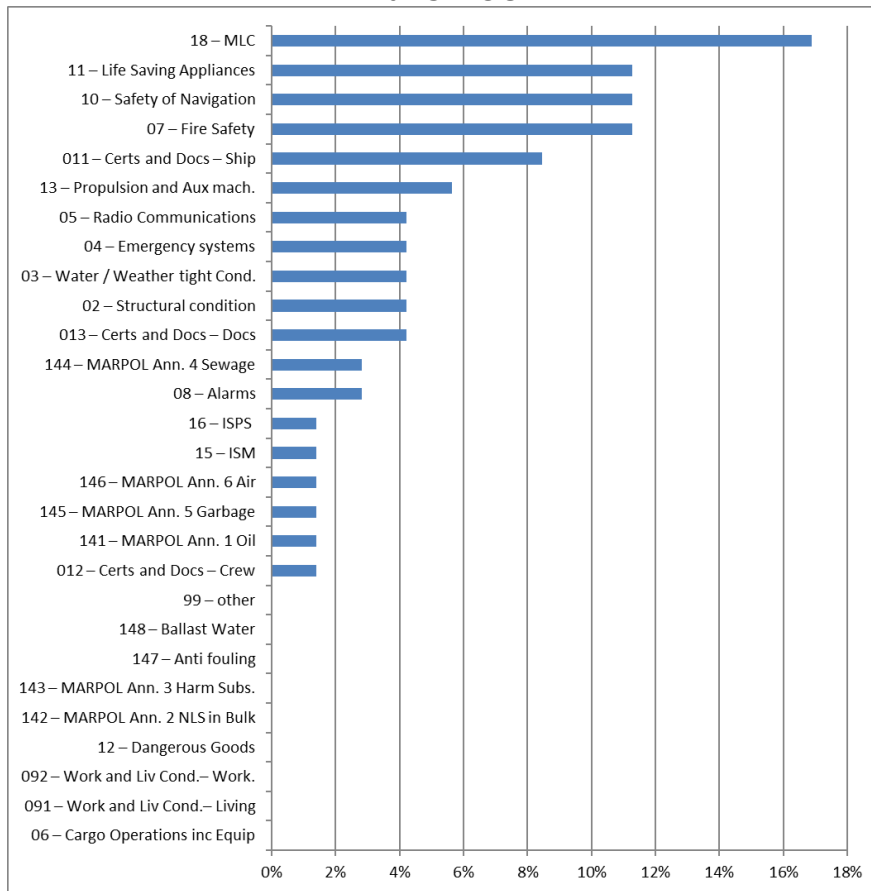
1.1%	13101	Propulsion main engine
1.1%	13103	Gauges, thermometers, etc.
1.1%	18299	Other - (Conditions of employment)
1.1%	18312	Galley, Handling room - (maintenance)
0.8%	4114	Emergency source of power / Emergency generator
0.8%	7106	Fire detection and alarm system
0.8%	7114	Means of control (opening/closure skylights, pumps, etc.) - Machinery Spaces
0.8%	9225	Loading and unloading equipment
0.8%	11112	Launching arrangements for survival craft
0.6%	1214	Endorsement by Flag State
0.6%	1305	Logbooks/compulsory entries
0.6%	2106	Hull damage impairing seaworthiness
0.6%	2107	Ballast, fuel and other tanks
0.6%	2112	Hull - corrosion
0.6%	2199	Other (structural condition)
0.6%	3105	Covers (hatchway - portable - tarpaulins, etc.)
0.6%	4102	Emergency fire pumps
0.6%	4108	Muster list
0.6%	7109	Fixed fire extinguishing installation
0.6%	8107	Machinery controls alarm
0.6%	10101	Pilot ladders and hoist / pilot transfer arrangements
0.6%	10105	Magnetic compass
0.6%	10112	Electronic charts (ECDIS)
0.6%	11105	Rescue boat inventory
0.6%	11110	Stowage of liferafts
0.6%	11113	Launching arrangements for rescue boats
0.6%	11199	Other (life saving)
0.6%	13104	Bilge pumping arrangements
0.6%	13108	Operation of machinery
0.6%	14104	Oil filtering equipment
0.6%	14199	Other (MARPOL - Annex -I)
0.6%	14402	Sewage treatment plant
0.6%	14802	Ballast Water Record Book
0.6%	18416	Ropes and Wires
0.6%	99103	Other (MARPOL operational)



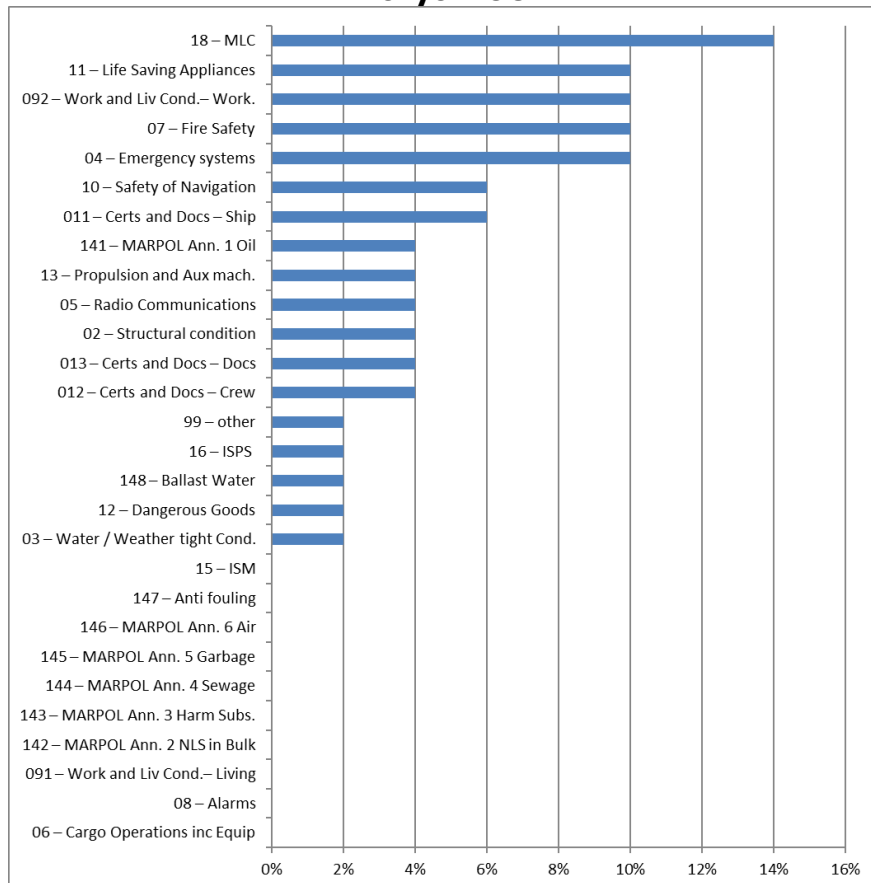
5. PSC Regional Deficiencies (last 12 months)

The following charts represent deficiencies raised in an MOU Region expressed as a percentage of the total deficiencies in the last 12-month period Q4 2019 – Q3 2020 (inclusive):

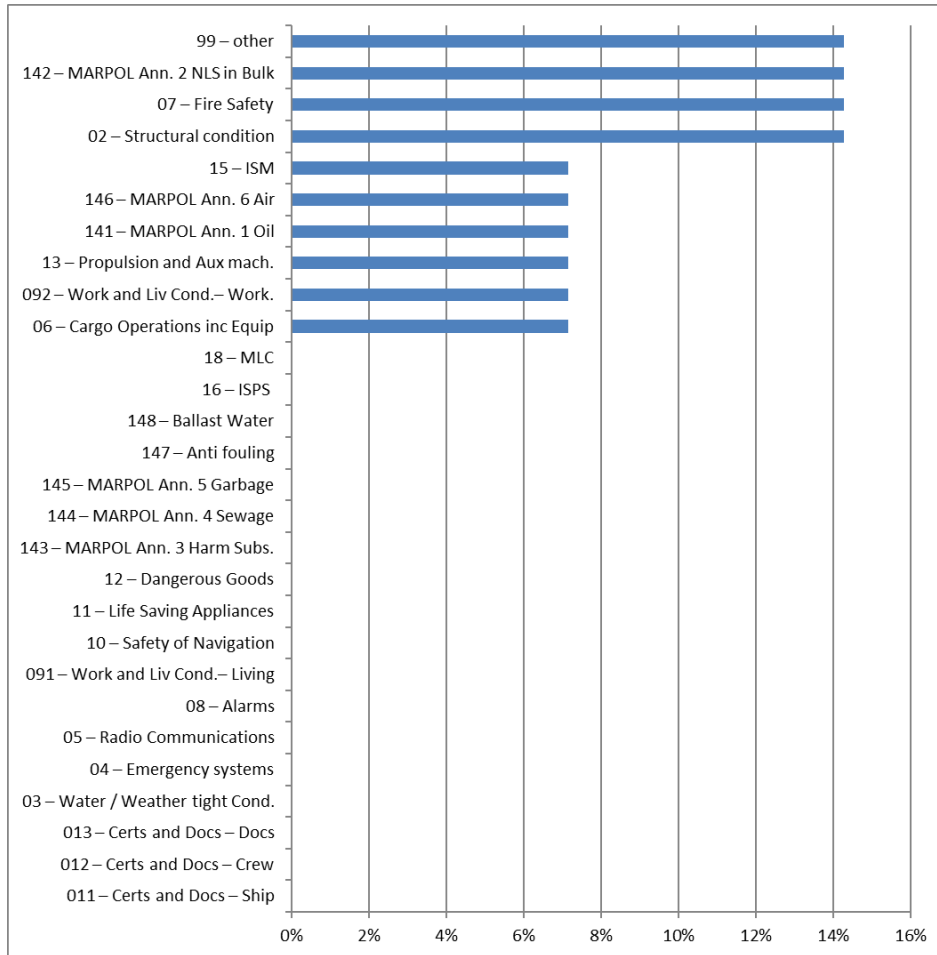
Paris MOU



Tokyo MOU



United States Coast Guard



Black Sea MOU

