## **Isle of Man Ship Registry Port State Control**



## **Information Notice 2-2022**

**Issued June 2022** 

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 and the elimination of "sub-standard" ships. The Port State authority will require defects to be put right and, where appropriate, detain ships for this purpose. PSC is therefore a port state's defence against arriving and departing substandard ships.

Technical managers are encouraged to forward this notice to Masters of Isle of Man registered ships in their fleet in support of shipboard operations and awareness prior to any PSC inspection.

**Isle of Man Ship Registry** — happy to help. For questions concerning statutory requirements relating to Isle of Man registered ships please email Isle of Man Ship Registry marine.survey@gov.im. 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.



## COVID19 guidance - refer to Technical Advisory Notice 02-2020

As a result of a recent ship detention we remind technical managers and ship masters - if anyone on board has COVID19 or COVID19-like symptoms please report this to the port authorities prior to arrival in port.



## 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 or authorities will not accept extension of the period of service on board beyond 11 months. Some countries will not accept at all and some countries will not accept 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.

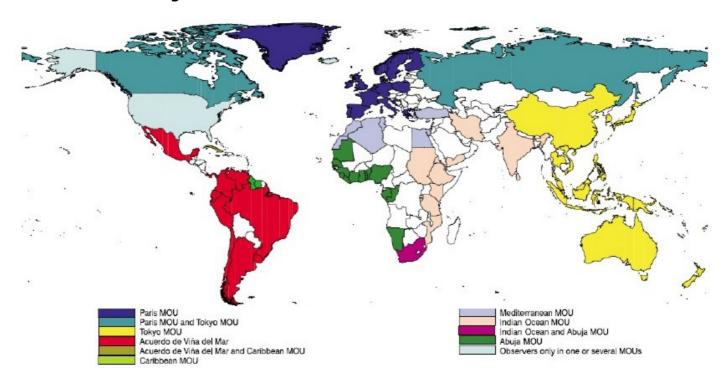
- If you agree with the deficiency raised then agree a practical corrective action plan with the PSC Officer. This should be reflected in the "action taken" coding stated on the Form B.
- If you do not agree with the deficiency raised then politely discus with the PSC officer before he/she leaves the vessel to clarify the statutory requirement (applicable to the ship's age and tonnage) and its implementation on board: 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 Paris MOU Indian MOU Mediterranean MOU Tokyo MOU www.bsmou.org www.parismou.org www.iomou.org www.medmou.org www.tokyo-mou.org Riyadh MOU
United States Coast Guard
Latin America MOU
Caribbean MOU
West and Central Africa MOU

www.riyadhmou.org cgmix.uscg.mil/PSIX www.acuerdolatino.int.ar www.caribbeanmou.org www.abujamou.org

#### Remember...

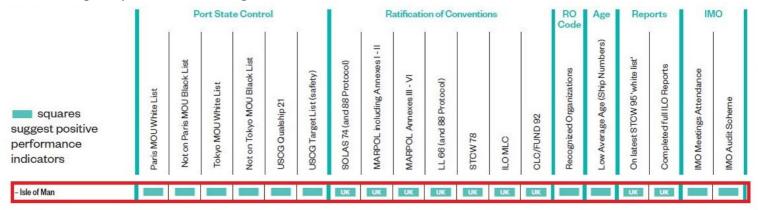
- All statutory equipment on board must be maintained in full working order capable of being used and
  ready for immediate use, which may be required to be demonstrated at any time regardless if it is being
  used for operations or not.
- If you are aware of any defects or equipment failures concerning statutory equipment then address these through the ship's defect reporting system and inform the Isle of Man Ship Registry and the 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 the defects. If this is not done the PSC Officer may incorrectly assume the ship staff are either not aware of the defect items or are lying about it either way this is bad for the ship.
- 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.

For information concerning "What to expect during a PSC Inspection" watch the IOM Ship Registry video presentations on the <u>Isle of Man Ship Registry YouTube channel</u>.



#### 1. Isle of Man Performance

The International Chamber of Shipping has published its 2020/2021 Shipping Industry Flag State Performance Table. The Flag State Performance Table is based on the most up-to-date data available as of January 2021. The Table summarises factual information in the public domain that might be helpful in assessing the performance of flag States.



UK - Indicates where a dependent territory's entry is based on the ratification, reporting or IMO meeting attendance of the UK 'mainland' flag.

For more information - Flag State Performance Tables ICS

### 2. MOU Regional Information:-

## Paris MoU (01/04/2022) - latest news:

- Paris MoU Newsletter: <a href="https://sway.office.com/uoHK4udAuyBDp8Je?ref=Link">https://sway.office.com/uoHK4udAuyBDp8Je?ref=Link</a>
- The Isle of Man has **'White List'** status as of the latest <u>2022-23 Paris MoU Performance List</u>.
- Annual report PMoU 2021
- Classification Societies recognised by Isle of Man (see MSN020) have a low risk.
- Paris MoU COVID19 Guidance
- **PS Circular: 101** Guidance on repatriation of seafarers due to situation in Ukraine, which aims to provide some guidance:- <u>Ukraine repatriation</u>
- **AFS Convention**:- will come into force on 1 January 2023. The resolution contains a ban to apply or re-apply anti-fouling systems containing cybutryne from 1 January 2023. All ships should remove or seal such anti-fouling systems no later than 60 months following the last application of such anti-fouling system prior to 1
- **Towing and mooring** (01 January 2023. SOLAS Ch II-1/3.8:-) require appropriate and safe-to-use designs of mooring arrangements, and introduce a maintenance and inspection regime, as well as proper documentation.
  - Guidelines on the design of mooring arrangements and the selection of appropriate mooring equipment and fittings for safe mooring" (MSC.1/Circ. 1619)
  - "Guidelines for inspection and maintenance of mooring equipment including lines" (MSC.1/Circ.1620)
  - "Revised guidance on shipboard towing and mooring equipment" (MSC.1/Circ. 1175/Rev.1)

## Modernization of the Global Maritime Distress and Safety System (in force 01/01/2024 – SOLAS Ch IV)

- the requirements for communication equipment have been moved from SOLAS Chapter III on life-saving appliances to Chapter IV on radio communications.
- The definitions of the sea areas A1 to A4 have been amended to reflect that the geographical area of coverage may vary between various satellite service providers.



#### Tokyo MoU (01/04/2022):

- The Isle of Man has 'White List' status as of the latest TMoU annual report (see Table 8 TMoU annual report 2021)
- Annual report TMoU 2021
- 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: (table 6 TMoU annual report 2021).
- Tokyo MoU COVID19 Guidance
- <u>Guidance on Remote PSC Inspections</u>
- Tokyo MOU Safety Bulletins

#### United States Coast Guard (USCG) 01/04/2022:

- The Isle of Man Ship Registry has achieved the required Flag State standard (2021) for those ships wishing to enroll on the <u>USCG's Qualship 21</u> and <u>E-Zero programs</u> subject to additional eligibility criterion being met as of the latest. <u>USCG Annual report 2021</u>
- 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 2021 USCG Annual Report (Qualship 21 - page 16 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

**USCG Safety Alerts and Safety Advisories** 

#### Other PSC Region reporting as at June 2022:-

#### **Black Sea MoU:**

2021 annual report

#### **Mediterranean MoU:**

• 2019 Annual Report

#### **Indian Ocean MoU:**

- Indian Ocean MoU COVID19 Guidance
- 2021 Annual Report here https://www.iomou.org/HOMEPAGE/pdf/Annual\_Report/AnrRep2021.pdf

#### **Caribbean MoU:**

- <u>Caribbean MoU COVID19 Guidance</u>
- 2020 Annual Report

#### **Rivadh MoU:**

2019 Annual Report

#### **Abuja MoU:**

2020 Annual Report



### 3. PSC Detention deficiencies (April to June 2022) - All PSC MOU Regions

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.

The following inspection areas represent deficiency areas raised which includes 2 detention(s) on Isle of Man registered ships period April to June 2022 from 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.

Deficiency Heading	Deficiency Comment
011 - Certificates & Documentation - Ship	
Certificate	SafCon certificate entry missing including exemption
	Deck line not as per ILLC
012 - Certificates & Documentation -	Wages to be recalculated as per CBA for the rank as junior
Crew Certificate	engineer
	SEA found Invalid
02 - Structural Condition	Permanent means of access completed
	Hull corrosion sighted and to be repaired
	Decks corrosion
	Hull corrosion
	Steering gear to be checked for operation
	Steering gear oil leakage
	Additional safety measure for bulk carriers not as required
03 - Water / Weathertight Condition	Hatch closing device seized
	Ventilator's damage and not watertight
	Sounding pipe purifier not up to standard
	(does not close automatically).
	Not clearly marked loadline marks
	Freeboard marks not clearly shown
	The lowest handrail on main deck just on port side of NO5 cargo hold bent seriously
	There is evidence of cargo seepage from cargo tank domes (few places)
	hatch arrangements for water tightness not as required
04 - Emergency Systems	Exterior emergency lights found inoperative
	Emergency lights defective
	Poor crew familiarization during emergency stations- CO2 operation
	The area water into which lifeboat is to be launched not adequately illuminated
	Emergency lights found inoperative
	Heavy static sound on PA.



One INMARSAT C unit (incl. LRIT) out of order.  Annual service EPIRP overdue. Annual service radio safety certificate out of window Annual service AIS overdue. Annual service radio safety certificate out of window. Annual service als overdue. Annual service radio safety certificate out of window. See other deficiency.  AIS antenna damaged  MF HF Radio unable to connect to local station  MF HF found inoperative  Of - Cargo Operations including Equipment  Cargo samples not segregated  Cargo operations and equipment not as required  Tankers of 20,000 tons and upwards the protection of the cargan tank shall be achieved by a fixed in a gas system in accordance with the requirements of the fire safety code during the test of the unit gas system the valve did not automatically went to atmosphere went above 5% volume.  The condition of the water ballast tank fixed gas detection sys shall be maintained to conform with the provisions of the presented and the provision and the provision and the p		MF/HF antenna broken. HF transition not functioning according
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louvers stay partly open. Some fan dampers to be operated		
manual while it has been demonstrated, remotely.  All to be checked.		·
System has two dampers in line.		
System has two dampers in line Defective fire dampers		
Pumps not as required		
Fire pump not as required		



	On VDU ER several (safety related or
	unclear) alarms active. I.e. emergency
	wire broken, DC24V source alarm and
	Isolate failure alarm. All alarms to be
08 - Alarms	repaired.
092 - Working & Living Conditions - Working Conditions	Inoperative gas sensor equipment
10 - Safety of Navigation	Unsafe pilot ladder
	Steering gear alarms inoperative
	Annual servicing VDR overdue. Annual
	radio safety certificate out of window. See
	other deficiency.
	Pilot ladder to be ready for immediate use
	Key officer not familiar with AIS operation
	Bravo Flag found discoloured and damaged.
	Access found unsafe
11 - Life Saving Appliances	Seized FFLB release mechanism
	Annual service rescue boat crane
	overdue. Annual service safety equipment
	out of window.
	Annual service Free Fall boat / crane
	overdue. Annual service safety equipment
	out of window. See other deficiency.
	Lifebuoys missing as required by LSA plan
	The instructions on the bulkhead for lowering the rescue boat are missing.
	No identification was found on Forward liferaft.
	Freefall lifeboat door found damaged.
12 - Dangerous Goods	Shower and eye wash for personnel use after cargo operations defective
13 - Propulsion & Auxiliary Machinery	Oil leak auxiliary generators
	Oil generators insufficient power
	Boiler emissions not as required
	The insulation resistance of emergency generator test failure
	Cascade tank water gauge in engine room have both pressbuttons seized.
141 - Pollution Prevention - MARPOL	Bunker line at the manifold port side to be pressure tested before
Annex I	next bunkering.



	Oil leakage in purifier room
	Pipe tunnel Ventilator on main deck aft of the forward mast is
142 - Pollution Prevention - MARPOL	
Annex II	missing.
144 - Pollution Prevention - MARPOL	
Annex IV	Unable to demonstrate Sewage plant operation
	Sewage pollution prevention not as required
	On emergency generator deck between accommodation and
145 - Pollution Prevention - MARPOL	main engine casing, numerous pipes are stored and are to be
Annex V	removed. reference MV BRAER accident.  Ballast water treatment unit out of order.
	ballast water treatment unit out of order.
148 - Pollution Prevention - Ballast Water	Exemption issued till The Netherlands.
	BWM records incorrectly completed
	BWM improved familiarization from crew required
	BWM records entry missing
	BWM Plan not filled
15 - ISM - Related deficiencies	Re audit by Class appointed for SMC additional verification
	ISM procedures not as required
	Safety management audit by the Administration is required before
	departure of the ship. Deficiencies marked SM are objective
	evidence of a serious failure, or lack of effectiveness, of implementation of the ISM Code.
	ISM SMS not being satisfied
18 - MLC 2006 - Accommodation,	15W 5W 5 Not being sutisfied
Recreational Facilities, Food & Catering	Damage to galley handling equipment
	General house keeping below basic standards
	B. L. P. C.
	Public sanitary condition substandard
	No hot water was available in hospital, galley and some cabins.
	Hot water main pipes has been removed.
	p p a second
	Heating found inoperative
	Appointed rank to be reassigned correctly as per standards.
	Missing hours of rest on May 2nd
	Missing flours of rest on Iviay 2110
	Electrical earthing provisions missing



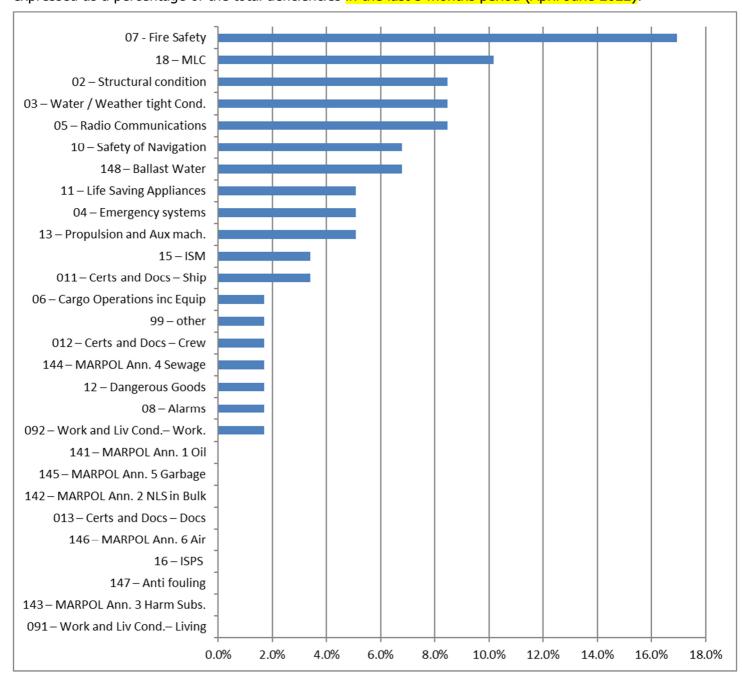
18 - MLC 2006 - Health Protection, Medical Care, Welfare and Social Security	
Protection	Poorly managed accident prevention standards in engine room
	Rat guards on both fore spring lines missing
	The stairway leading from main deck to rescue boat stbd side have
	a step with different height in the middle part.
	lighting not maintained as required
99 - Other	Safety awareness to be improved
	Not as required
	Not as required

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



## 4. PSC Deficiencies (April-June 2022) - All PSC MOU Regions

The following chart represents deficiency areas requiring corrective action raised in all MOU Regions expressed as a percentage of the total deficiencies in the last 3 months period (April-June 2022):



### For example "07-Fire Safety" is made up of the total 7xxx deficiency codes raised.

As part of the Isle of Man's commitment to reducing Port State Control (PSC) deficiencies, the 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.



## 5. PSC Deficiencies by Code (last 3 months) – All PSC MOU Regions

The following table represents the most common individual deficiency items raised by code (Paris MOU coding system) with examples of deficiencies raised in the last 3 months period (Apr-June 2022) in all 10 MOU regions. It is recommended masters and technical managers pay special attention for any defects on board in the areas identified.

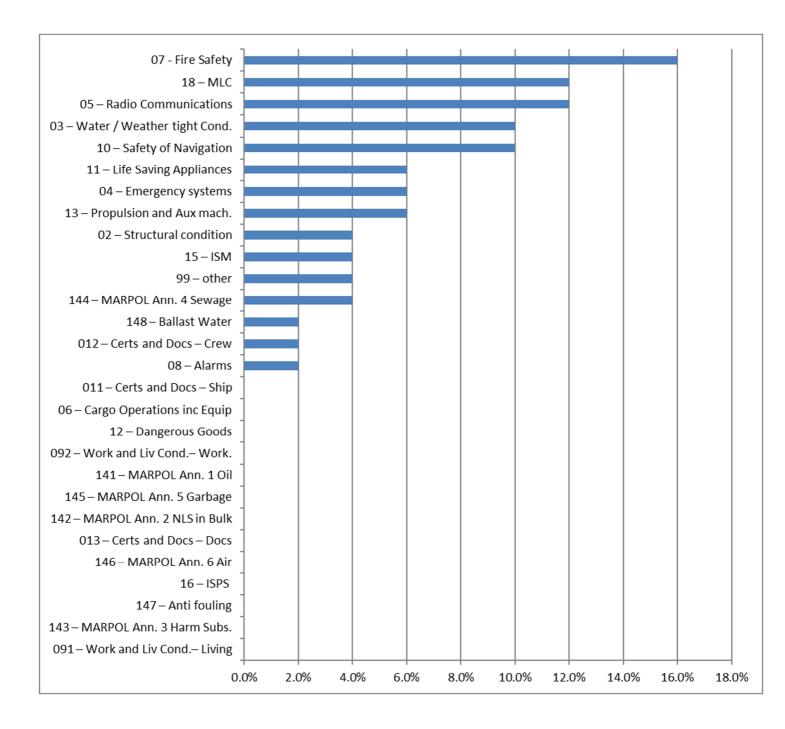
%	<b>Deficiency Code</b>	Deficiency Description
16.9%	07	Fire safety
		Fire doors not closing or not sealing
		Smoke detection system out of order.
		CO2 system not as required
		Fire pump not as required
10.2%	18	MLC
		Galley conditions, heating and ventilation of accommodations, hours of
		rest, hygiene, wages
8.5%	02	Structural condition
		Bulkhead corrosion, means of access in poor conditions
		No records of Guidelines for Maintenance and Monitoring of On-Board
		Materials Containing Asbestos found on board
8.5%	03	Water / Weather tight Cond.
		Freeboard marks, railing, gangway, walkway and means for safe
<b>2 -</b> 2/		passage, cargo and other hatchways not as required
8.5%	05	Radio communications
6.00/	40	MF HF radio found inoperative
6.8%	10	Safety of Navigation
		Nautical publications expired
		Compass correction log not filled correctly
		Defective navigation lights
6.8%	148	Inoperative radar  Ballast Water
0.0%	140	
5.1%	11	BWM records not clearly written nor indicative of D1 or D2 system  Life Saving Appliances
5.1%	11	On board training and missing instructions
		Lifebuoys to comply with convention standards
		Rigid liferafts, embarkation ladder to be replaced
		Marine evacuation systems, LSA to be ready for use
5.1%	04	Emergency systems
01270		Public address systems, emergency lighting, batteries and switches not
		as required
5.1%	13	Propulsion and Aux mach.
		Fire and general service pumps to be repaired
		ME LO Gauge and cooling gauge inoperative
3.4%	15	ISM
		Failure, or lack of effectiveness, of implementation of the ISM Code.
3.4%	011	Certificates & Documentation - Ship Certificate
		SafCon certificate entry missing including exemption
		Deck line not as per ILLC



## 6. PSC Deficiencies by Ship Type (last 3 months) - All PSC MOU Regions

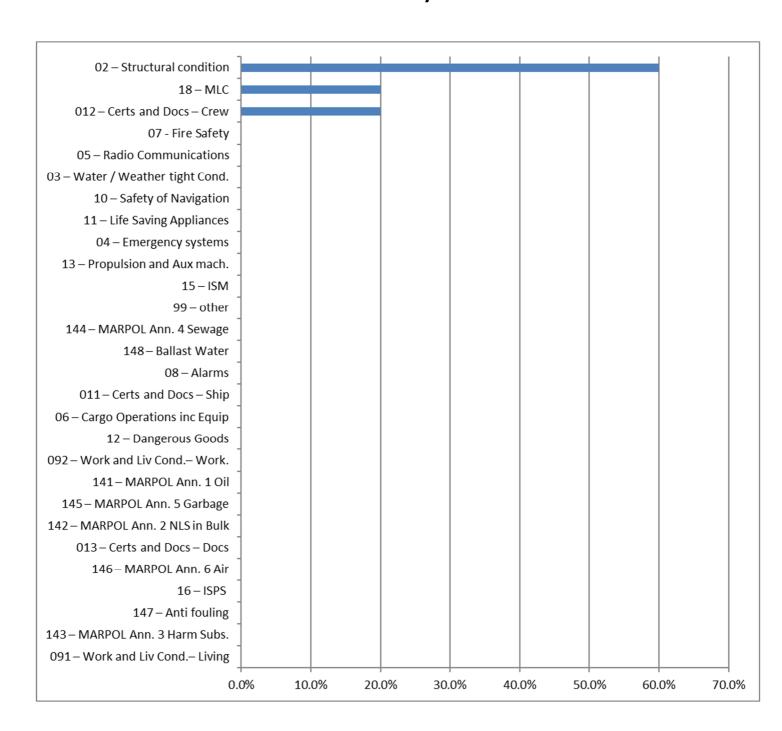
The following tables and charts represent the most common deficiency items raised by code (Paris MOU coding system) per ship type in the last 3 months period (Apr-June 2022) in all MOU regions — Bulk carriers, Gas carriers, Oil tankers, Oil/Chemical tankers, Offshore vessels, Cargo ships, Yachts.

## **Bulk Carriers Overall Deficiency Trend**



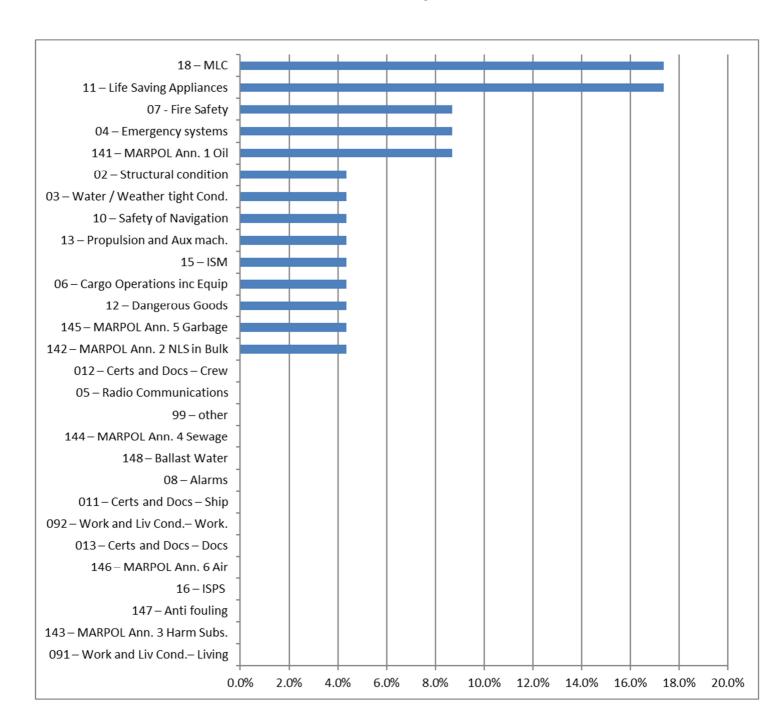


## Gas Carriers Overall Deficiency Trend



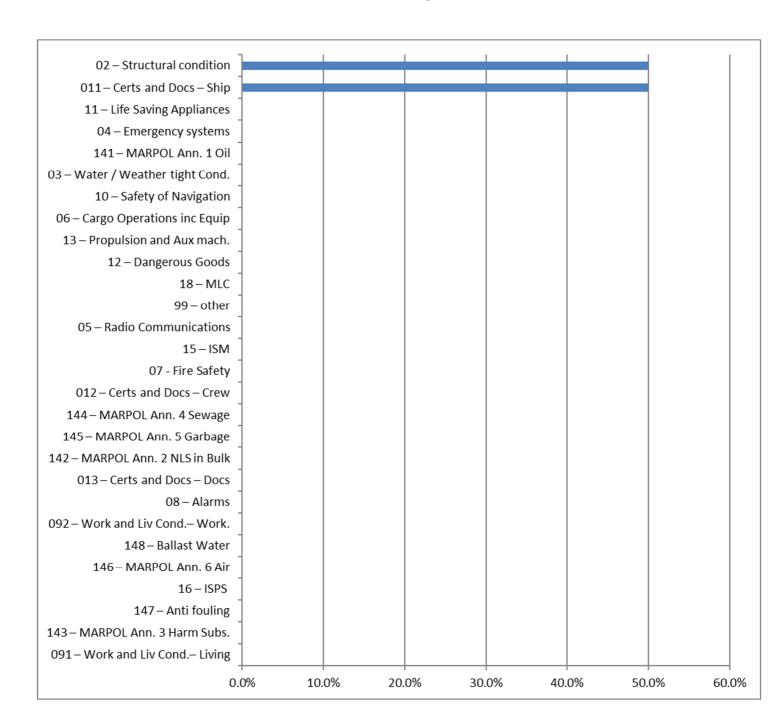


## Oil/Chemical Tankers Overall Deficiency Trend





# Commercial Yachts Overall Deficiency Trend





## Other Cargo ships Overall Deficiency Trend

