

Frequently Asked Questions (FAQ)

Some Frequently Asked Technical Information Requirements for Hong Kong Registered Cargo Ships

This Annex addresses a number of technical issues, requirements involving Life-Saving Appliances, Fire Fighting Systems and Appliances, Radio and Navigational Equipment, Safety Equipment, STCW matters etc. for Hong Kong Registered Cargo Ships.

The following is a list of technical issues frequently asked by the industry. (August 2021)

1. Portable fire extinguishers

[IMO Resolution A.951 \(23\), paragraph 9; MSC.1/Circ.1432](#)

Extinguishers should be subject to periodical inspections in accordance with the manufacturer's instructions and serviced at intervals not exceeding one year.

- (a) At least one extinguisher of each type manufactured in the same year and kept on board a ship should be test discharged at five yearly intervals (as part of a fire drill).
- (b) All extinguishers together with propellant cartridges should be hydraulically tested in accordance with the recognized standard or the manufacturer's instruction at intervals not exceeding ten years.
- (c) Service and inspection should only be undertaken by, or under the supervision of, a person with demonstrable competence, based on the inspection guide in table 9.1.3.

Records of inspections should be maintained. The records should show the date of inspection, the type of maintenance carried out and whether or not a pressure test was performed.

Extinguishers should be provided with a visual indication of discharge.

Instructions for recharging extinguishers should be supplied by the manufacturer and be available for use on board.

(A competent person may be taken as Chief Officer, Second Engineer or above, refer to IMO MSC.1/Circ.1432);

2. Spare charges for portable fire extinguishers

[IMO MSC.1/Circ.847, paragraph 6.2](#)

For portable fire extinguishers of the same type, capable of being recharged on board, the spare charges should be provided as follows:

- (a) 100% for the first ten portable fire extinguishers and 50% for the remaining portable fire extinguishers but not more than 60; and
- (b) For portable fire extinguishers that cannot be recharged by the crew, additional portable fire extinguishers of the same quantity, type, capacity and number as determined in (a) above should be provided in lieu of spare charges.

3. Testing for portable fire extinguishers

[IMO MSC.1/Circ.847, paragraph 6.5](#)

- (a) The extinguishers should be examined annually by a competent person.
- (b) Each extinguisher should be provided with a sign indicating that it has been examined.
- (c) Containers of permanently pressurized fire extinguishers and propellant bottles of non-pressurized fire extinguishers should be hydraulic pressure tested as follows:
 - powder extinguishers every 10 years;
 - CO2 - extinguishers every 10 years; and
 - other extinguishers every 10 years.

Containers of non-permanently pressurized fire extinguishers should be hydraulic pressure tested every 10 years.

4. Maintenance and inspection of storage containers in fixed carbon dioxide fire extinguishing system

IMO MSC.1/Circ.1318/Rev.1, paragraph 6.1.2

At least at each intermediate, periodical or renewal survey, the following maintenance should be carried out:

The hydrostatic test date of all storage containers should be checked. High pressure cylinders should be subjected to periodical tests at intervals not exceeding 10 years. At the 10-year inspection, at least 10% of the total number provided should be subjected to an internal inspection and hydrostatic test. If one or more cylinders fail, a total of 50% of the onboard cylinders should be tested. If further cylinders fail, all cylinders should be tested. Before the 20-year anniversary and every 10-year anniversary thereafter, all cylinders should be subjected to a hydrostatic test. Flexible hoses should be replaced at the intervals recommended by the manufacturer and not exceeding every 10 years.

5. Controls for fixed carbon dioxide fire extinguishing system

FSS Code, Chapter 5, paragraph 2.2.2

Carbon dioxide systems shall comply with the following requirements:

- (a) Two separate controls shall be provided for releasing carbon dioxide into a protected space and to ensure the activation of the alarm. One control shall be used for opening the valve of the piping which conveys the gas into the protected space and a second control shall be used to discharge the gas from its storage containers. Positive means shall be provided so they can only be operated in that order; and
- (b) The two controls shall be located inside a release box clearly identified for the particular space. If the box containing the controls is to be locked, a key to the box shall be in a break-glass-type enclosure conspicuously located adjacent to the box.

6. Foam fire-extinguishing systems

IACS Recommendation No.53; IMO MSC.1/Circ.1432; MSC.1/Circ.1312; MSC/Circ.670; MSC/Circ.798

Foam sample analysis shall be carried out after a period of 3 years after being supplied to the ship and thereafter every year at authorized service agent or manufacturer's laboratory. A record of the age of the foam concentrates and of subsequent controls should be kept onboard.

7. Air cylinders for self contained breathing apparatus (SCBA)

IMO MSC.1/Circ.1432; IACS Recommendation No.88

SCBA cylinders should be hydrostatic tested at intervals not exceeding 5 years and the hydrostatic test date must be permanently marked on the cylinders. Two spare charges suitable for use with the breathing apparatus should be provided for each SCBA. If cargo ships are equipped with suitably located means for fully recharging the air cylinders free from contamination, only one spare charge is required for each required SCBA.

8. Air cylinders for air supply in totally enclosed lifeboats

IACS Recommendation No.88

Air cylinders for air supply in totally enclosed lifeboats should be hydrostatic tested by a competent service station recognized by a Recognized Organization at intervals not exceeding 5 years and the hydrostatic test date must be permanently marked on the cylinders.

9. Medical oxygen cylinders

International Medical Guide for Ships

Medical first aid guide for use in accidents involving dangerous goods.

A ship should carry adequate quantity of medical oxygen in accordance with WHO's International Medical Guide for Ships. A ship should carry additional quantity of medical oxygen in accordance with IMO's Medical first aid guide for use in accidents involving dangerous goods when carrying dangerous goods.

10. IMSBC Code

Statement of compliance for IMSBC Code certification would be issued under the agreement between shipowner and classification society and would not be issued on behalf of HKSAR.

11. Remotely located survival crafts

IACS unified interpretation SC 213; IMO MSC.1/Circ.1490/Rev.1

Liferafts, if located at the aft/forward end of the ship and at a distance of more than 100m from the closest survival craft, as required by SOLAS regulation III/31.1.4, should be regarded as "remotely located survival craft" with regards to SOLAS regulation III/7.2.1.4. Following requirements are to be applied to all HK cargo ships regardless of date of construction.

- (a) A minimum number of 2 lifejackets and 2 immersion suits;
- (b) Adequate means of illumination, complying with SOLAS regulation III/16.7, either fixed or portable, which shall be capable of illuminating the liferaft stowage position as well as the area of water into which the liferaft should be launched. Portable lights, when used, shall have brackets to permit their positioning on both sides of the ship; and
- (c) An embarkation ladder or other means of embarkation enabling descent to the water in a controlled manner * in accordance with SOLAS regulation III/11.7.
* Controlled manner: A knotted rope is not acceptable for this purpose.
- (d) Self-contained battery-powered lamps may be accepted as means of illumination for complying with SOLAS regulation III/16.7. Such lamps should be capable of being recharged from the ship's main and emergency source of electrical power, and should be

stowed close to the liferaft and embarkation ladder they are intended to serve, under change.

12. Requirement for maintenance, thorough examination, operational testing, overhaul and repair of lifeboats and rescue boats, launching appliances and release gear

[Resolution MSC.402\(96\), Annex, paragraph 3.1](#)

Administration shall ensure that the thorough examination, operational testing, repair and overhaul of equipment (see paragraphs 4.2 and 4.3) shall be carried out in accordance with SOLAS regulation III/20 by service providers authorized in accordance with section 7 of Resolution MSC.402(96).

This Administration fully authorizes our ROs for carrying out inspection and certification. Please contact the ship's classification society for their guidance/acceptance.

13. Lifeboat turn out

[SOLAS regulation III/20.7](#)

SOLAS regulation III/20.7 requires that all lifeboats, except free-fall lifeboats, shall be monthly turned out from their stowed position, without any person on board if weather and sea conditions so allow.

14. Lifeboat drill

[IMO MSC.1/Circ.1578, Annex, paragraph 2.3.2](#)

When drills are to be performed with persons on board the lifeboat, it is recommended that the lifeboat be lowered and recovered without any persons on board first to ascertain that the arrangement functions correctly. In this case, the boat should then be lowered into the water with only the number of persons on board necessary to operate the boat.

15. Freefall lifeboat drill

[IMO MSC.1/Circ.1578, Annex, paragraph 2.4.2](#)

When the lifeboat is free-fall launched as part of a drill, this should be carried out with the minimum personnel required to manoeuvre the boat in the water and to recover it. The recovery operation should be carried out with special attention, bearing in mind the high-risk level of this operation. Where permitted by SOLAS, simulated launching should be carried out in accordance with the manufacturer's instructions, taking due note of the Guidelines for simulated launching of free-fall lifeboats, as set out in the appendix of MSC.1/Circ.1578.

16. Lifeboat fall preventer device

[IMO MSC/Circ.1327](#)

A "Fall Preventer Device" (FPD) can be used to minimize the risk of injury or death by providing a secondary alternate load path in the event of failure of the on-load hook or its release mechanism or of accidental release of the on-load hook. However, FPDs should not be regarded as a substitute for a safe on-load release mechanism. If FPDs are provided, they must be designed, installed, inspected and utilized in accordance with the manufacturer instruction and complied with IMO MSC/Circ.1327. The ship's operating crew should be familiar with the operation of the FPD fitted to the lifeboat on their ship. The procedure to be followed should be contained in

the ISM Code documentation and the ship's training manual.

17. Falls used in launching life saving appliances

Code of safe working practices for merchant seaman 2015 edition – Amendment 5, Chapter 18.28.8

Wire rope grips “bulldog grips” are not accepted. Where wire rope grips “bulldog grips” are found to have been used on primary load-bearing terminations, arrangements are to be made by the operators to have them replaced wedged socket etc.

18. Medical Store

<https://www.mardep.gov.hk/en/faq/pdf/mlc190222.pdf>

A cargo ship registered in Hong Kong is required to have onboard medicines or medical stores in accordance with the Schedule(s) of Cap. 478X “MERCHANT SHIPPING (SEAFARERS) (MEDICAL STORES) REGULATION”.

The updated Medicine list published as per the WHO “International Medical Guide for Ships 3rd edition” and “the Joint Statement of WHO Collaborating Centres for the Health of Seafarers and the International Maritime Health Association” is recommended in addition to the requirement of Cap. 478X.

19. Acceptance of material and equipment

HKMD accepts materials and equipment complying with test procedures/standards and performance specifications laid down by IMO. In general, materials and equipment approved by a maritime authority for use on its registered ships or approved by the authorized Recognized Organization or Recognized Security Organization of HKMD are acceptable to be used on cargo ships registered in Hong Kong.

20. GMDSS radio installations operation and maintenance

<https://www.mardep.gov.hk/en/faq/pdf/clpsc071127.pdf>

Test on DSC radio installations must be completed with reception acknowledgement so that the effectiveness of the equipment could be ensured. If no acknowledgement is received despite of numerous tests, it should be recorded in the radio log book and the shore engineer should be called upon to check the effectiveness of the DSC radio.

21. Dispensation for shipboard crew

Article VIII of STCW Convention

Dispensation for a Master or a Chief Engineer will never be granted except in circumstances of force majeure in accordance with STCW Article VIII.

22. Application evidence for certificate of endorsement

https://www.mardep.gov.hk/en/pub_services/pdf/coc_gl4.pdf

The “Consolidated Application for the Issue of Hong Kong Licence(s)” is the official acknowledgement and is issued in accordance with paragraph 5 of STCW regulation I/10. The officers are allowed to serve on Hong Kong registered ship(s) in the indicated or lower for three

months pending the issue of the Hong Kong Licences under paragraph 5 of STCW regulation I/10. The email copy of the “Consolidated Application for the Issue of Hong Kong Licence(s)” serves the purpose of documentary proof and there is no mandatory requirement to have original copy on board for this official acknowledgement.

23. Annual Performance Test of AIS

[IMO MSC.1/Circ.1252](#)

To carry out annual performance test of AIS in accordance with the IMO MSC.1/Circ.1252 by a qualified radio inspector of an approved radio firm, and to retain the "AIS Performance Test Report" issued by the radio firm on board the ship.

24. Annual Performance Test of EPIRB

[IMO MSC.1/Circ.1040/Rev.1](#); [MSC.1/Circ.1123](#)

To carry out annual performance test of EPIRB in accordance with the above IMO Circulars by a qualified radio inspector of an approved radio firm, and to retain the "EPIRB Performance Test Report" issued by the radio firm on board the ship.

25. Annual Performance Test of VDR/S-VDR

[IMO MSC.1/Circ.1222/Rev.1](#)

To carry out annual performance test of VDR/S-VDR in accordance with the IMO MSC.1/Circ.1222/Rev.1 by a qualified radio inspector of an approved radio firm, and to retain the "VDR/S- VDR Performance Test Report" issued by the radio firm on board the ship.

26. Review on hours of rest

<https://www.mardep.gov.hk/en/faq/pdf/elsolas110315.pdf>

This circular serves to draw particular attentions of all Hong Kong shipowners, ship managers and shipmasters to observe the requirements of hours of work/rest under the STCW Convention/MLC 2006 and recommend ships should be provided with adequate tools/systems to record and examine the hours of rest for each crewmember effectively as it is difficult to verify all the requirements manually.

27. Port State Control

In the event of a Hong Kong registered ship being detained as a result of PSC intervention, the shipmaster or owner should immediately:

- (a) Forward a copy of the PSC inspection report (i.e. FORM A and FORM B), stating when, where and by whom the ship has been detained, to this Department; and
- (b) Contact the local office(s) of the ship’s Classification Society and/or the ship’s SMC classification Society and/or the ship’s ISSC Recognized Security Organization to arrange an inspection and/or audit for confirmation of the deficiencies and/or non-conformities, and other necessary remedial action as directed by the port State.

28. Emergency escape breathing device (EEBD)

[IACS Recommendation No.88](#); [IMO MSC.1/Circ.1081](#); [MSC.1/Circ.1432](#)

At least two EEBDs and one spare EEBD should be provided in accommodation spaces.

In machinery spaces for category A containing internal combustion machinery used for main

propulsion, EEBDs should be positioned as follows:

- (a) One EEBD in the engine control room, if located within the machinery space.
- (b) One EEBD in workshop areas. If there is, however, a direct access to an escape way from the workshop, an EEBD is not required.
- (c) One EEBD on each deck or platform level near the escape ladder constituting the second means of escape from the machinery space (the other means being an enclosed escape trunk or watertight door at the lower level of the space).

For machinery spaces of category A other than those containing internal combustion machinery used for main propulsion, one EEBD should, as a minimum, be provided on each deck or platform level near the escape ladder constituting the second means of escape from the space (the other means being an enclosed escape trunk or watertight door at the lower level of the space).

The EEBDs should be annually tested and inspected according to maker's instructions.

29. Immersion suit

[SOLAS Chapter III/Reg. 32.3; IMO MSC.1/Circ.1114, Annex, paragraph 3](#)

- (a) An immersion suit of an appropriate size shall be provided for every person on board.
- (b) At least two immersion suits of an appropriate size at the bridge.
- (c) At least two immersion suits of an appropriate size at the engine control room.
- (d) At least two immersion suits of appropriate size for additional forward liferaft fitted.

To ensure the maintenance of adequate strength and water tightness of seams and closures of immersion suits and anti-exposure suits with age, each suit is subjected to an air pressure test at intervals not exceeding three years, or more frequently for suits over ten years of age.

30. Electronic Nautical Publications including Digital Notice to Mariner

[IMO MSC-MEPC.2/Circ 2](#)

Nautical Publications including Notice to Mariner carried on board Hong Kong registered ships may be in the form of either hard copies or electronic media, such as CD-ROM. When using electronic means, MSC-MEPC.2/Circ 2, "IMO Requirements on Carriage of Publications on Board Ships" shall be complied with and following requirements are to be observed:

- (a) Electronic Nautical Publications (ENPs) shall be accessible to the Officer of Watch (OOW) without the need to leave his duty station;
- (b) A computer shall be dedicated for ENPs and connected always to the main and emergency power supplies;
- (c) For backup purpose, ENPs shall also be available in another computer on board which shall be accessible to the OOW in a short period of time; and
- (d) Operational guidelines for using the system and viewing of the publications shall be available on board and make known to all officers concerned.
- (e) All publications on board ships, regardless of format, should be the latest editions or duly corrected up to date.

31. Official Logbook and other logbooks/records

Official log book for Hong Kong registered ships: The specific form HKLOG3 should be used

as a ship's Official Log Book. The Official Log Book is available at MMO (Mercantile Marine Office).

Tel: 2852 3061 email: mmo_mdd@mardep.gov.hk

The following log books and record books could be purchased from other suppliers or Information Services Department or the Shroff / Central Marine Office of Marine Department.

- Global Maritime Distress and Safety System (GMDSS) Radio Log Book
- Oil Record Book Part I - Machinery Space Operations (All Ships)
- Oil Record Book Part II - Cargo/Ballast Operations (Oil Tankers)
- Garbage Record Book Part I – All Ships
- Garbage Record Book Part II – Ships that carry Solid Bulk Cargoes
- Ballast Water Record Book

The Shroff / Central Marine Office, Marine Department: 3/F Harbour Building, 38 Pier Rd, Central, Hong Kong Tel: 2852 4957 Fax: 2815 9356 (Service hours: Monday - Friday 8:30 a.m. to 12:30 p.m., and 2:00 p.m. to 4:30p.m. Payment: only accept 'CASH' or 'EPS'.)

The above log books and record books may also be purchased at Government Bookstore (online order). <https://www.gov.hk/en/residents/government/publication/publication/bookstore.htm>

Regarding the GMDSS Radio Log Book, Oil Record Book Part I & Part II, Garbage Record Book Part I & Part II and Ballast Water Record Book, the ship staff may use similar Log/Book published by other suppliers, provided that the content and format of the Log/Book are complied with relevant Conventions.

For the use of Electronic Record Books under MARPOL, the ship staff may refer to HKMSIN 22/2019.

32. Multiple Load Lines

<https://www.mardep.gov.hk/en/faq/pdf/clloadline061220.pdf>

Applicant should contact the Recognized Organization (RO) directly and provided with the details such as the figure of original load line with the dead weight and the new load line with the new dead weight etc. to seek Marine Department's authorization for assigning additional load lines.

Each set of the load line marks shall be verified by a surveyor of the RO when they are marked on the ships sides for the first time and subsequent periodical inspections.

Marine Department accepts that the verification can be conducted by the ship's master instead of the RO surveyor. For change of the assigned freeboard, the master should follow the guidelines.

33. Exemption from Fixed Fire-extinguishing System for Cargo Spaces

SOLAS Regulation II-2/10.7.1.3 & 10.7.2

Every cargo space on cargo ship of 2,000 tons and upwards shall be provided a fixed gas fire extinguishing system complying with the provisions of the Fire Safety Systems Code (FFS).

The Director may exempt any Hong Kong registered ship from the above requirements if the ship is constructed and solely intended for the carriage of ore, coal, grain, unseasoned timber or non-combustible cargoes or cargoes which, in the opinion of the Director, constitute a low fire

risk; and the ship is fitted with steel hatch covers and effective means of closing all ventilators and other openings leading to the cargo spaces.

Applicant (either owners/management company/Recognized Organization) should send the application for the exemption to Cargo Ships Safety Section (e-mail: exemption@mardep.gov.hk) with:

- (a) a statement issued by the Recognized Organization (RO) to confirm that the vessel complies with SOLAS Reg. II-2 10.7.1.4 as follows:
 - (1) the vessel is constructed, and solely intended, for the carriage of ore, coal grain, unseasoned timber, non-combustible cargoes or cargoes which constitute a low fire risk; and
 - (2) the ship is fitted with steel hatch covers and effective means of closing all ventilators and other openings leading to the cargo spaces; and
- (b) a copy of the “Certificate of Survey” (COS) of the ship issued by the RO.

The initial Exemption Certificate will be issued by the Director of Marine. However, for operational conveniences to all parties, all subsequent renewal of these exemption certificates may tie in with the renewal of the trading certificates and be issued by ROs or RSOs. The Director needs not be consulted by ROs or RSOs on the renewal of such exemption certificates unless the conditions stated by the Director in the original exemption certificates cannot be fulfilled.

34. Bridge Navigational Watch Alarm System (BNWAS)

<https://www.mardep.gov.hk/en/msnote/pdf/msin1443.pdf>

The position of Hong Kong Marine Department is as follows:

- (a) BNWAS which is going to be installed prior to 1 July 2011 should preferably be of an approved type conforming to IMO resolution MSC.128(75) - Performance Standards for a Bridge Navigational Watch Alarm System (BNWAS), unless the owner applies for exemption from us with reasonable grounds;
- (b) BNWAS which is already installed may be exempted from full compliance with MSC.128(75) provided that it has similar functions to a BNWAS conforming to MSC.128(75); and
- (c) BNWAS which is not in full compliance with MSC.128(75) should be tested by its manufacturers or our recognized ROs to confirm that it is suitable for installation on board ships and has similar functions to a BNWAS conforming to MSC.128(75).

If the BNWAS was installed prior to 1 July 2011, you are required to approach the vessel’s classification society for their verification of complying with the above. Otherwise, BNWAS installed after 1 July 2011, it needs full compliance with IMO standards requirement.

In simple words, according to above para. (b) & (c), the test by its manufacturers or our recognized ROs to confirm that it is suitable for installation on board ships and has similar functions to a BNWAS conforming to MSC.128(75) is the prime concern.

35. Manning Scale for Laid-up Ships

A laid-up ship becomes idle and major activities such as navigation and engine operations will be reduced. Manning scale stipulated in the Minimum Safe Manning Certificate (MSMC) may not be applicable to the ship.

When the laid-up ship is in port or harbour, the manning scale shall meet the manning requirement from the Port or Harbour authority. The master must seek permission from the Port or Harbour authority for agreement on the manning scale. However, in case the ship stays outside the territorial water which is not under the jurisdiction of any port or harbour authority, the vessel shall comply with the flag State's requirement.

For a laid-up ship stays outside the territorial water and request for reducing the manning scale, the ship manager may submit an application for exemption with proposed manning scale and supporting documents to Marine Department (MD) for approval. We will assess the manning scale which should be adequately to maintain the security, safety, environmental protection, structure and machineries of the ship. An exemption certificate with conditions and revised manning scale will be issued to the ship after the assessment.