



香 港 商 船 資 訊

HONG KONG MERCHANT SHIPPING INFORMATION NOTE

Quality Assurance for Hong Kong Registered Ships

To : Shipowners, Ship Managers, Ship Masters and Recognized Organizations

Summary

The purpose of this Note is to inform shipowners, ship managers, ship masters and recognized organizations of the measures taken by Marine Department to maintain the quality of the ships on the Hong Kong Shipping Register. This Note supersedes Hong Kong Merchant Shipping Information Note No. 35/2009 issued on 11 November 2009.

Flag State Quality Control (FSQC) system

1. It is the responsibility of a flag State that administers its shipping register to ensure its ships are in full compliance with the applicable international and national regulations. To this end, the Marine Department (MD) introduced in 1999 a Flag State Quality Control (FSQC) system to uphold the quality of Hong Kong registered ships.
2. FSQC is a systematic and interactive management system that differs from mainly reliance on regular ship inspections by MD surveyors. It stresses more on assuring that ship managers discharge their responsibilities properly and that recognized organizations (ROs) and recognized security organizations (RSOs) carry out effective and decent surveys as well as audits on Hong Kong ships. The MD continuously monitors the work of ROs and RSOs through careful vetting of all survey and audit reports; participation in DOC audits, SMC and/or ISPS audits; evaluation of port State control inspection records of Hong Kong registered ships, etc. Quality control on safety management over companies managing Hong Kong ships is exercised through participation in DOC audits by ROs and ISPS audits by RSOs, feedback from port State control and FSQC inspections.

3. FSQC is supported by a computer-based information system to monitor the quality of Hong Kong registered ships. The database is built up on information obtained from various sources such as survey records from port State control inspection and detention records, RO's inspection and audit records, FSQC ship inspections and company audits etc. The information of each ship on the Register will be analyzed to assess the ship's compliance with applicable regulations.

4. The criteria for selection of ships for FSQC inspection include but are not limited to safety management performance of the company, port State control inspection records of the ship, age and type of the ship, time laps since previous FSQC inspection of ships managed by the same company, RO's survey and audit records, assessment of crew quality, casualty record of ships managed by the company and assessment of the ROs which are responsible for the survey and audits. More attention is paid to old ships, ships which have detention record under port State control, and certain types of ships such as bulk carriers or general cargo ships. The purpose of the FSQC inspection is to identify the underlying cause of the deteriorating standards.

5. All FSQC inspections are followed up in great detail with the company, the ROs and RSOs concerned. If the FSQC inspection identifies deficiencies in the management of the ship, extra DOC and/or SMS audit will be carried out to address the problem sometimes with the cooperation of the concerned ROs and the senior management of the company. **All such FSQC ship inspections and company audits are free of charge initially but company will be charged if the problem recurs.**

6. Under either of the following circumstances, **at the owner's or the manager's cost**, the Director of Marine may request a special FSQC and/or company audit in order to assist the company concerned and/or its fleet to enhance their standards:

- (a) if a Hong Kong registered ship is detained with serious deficiencies under port State control or subjected to a serious accident;
- (b) if the serious deficiencies or accident are found to be the result of a deficient ship management system, the safety management system of the company may also be audited to verify compliance with ISM Code.

7. After a request of FSQC inspection is made pursuant to paragraph 6, where it is satisfied that the FSQC inspection was not carried out within a reasonable period¹ due to a passive response or inaction of the ship management company, the MD may consider to withdraw the full term Safety Management Certificate (SMC) from the ship and replace with a short term certificate. Full term SMC will only be re-instated after the FSQC inspection had been satisfactorily carried out.

¹ Reasonable period may vary from ship to ship depending on the ship's trade and ports of call.

Pre-registration Quality Control (PRQC) system

8. To ensure ships joining the Register meet all safety and pollution prevention standards promulgated by IMO at the time of entry, a Pre-registration Quality Control (PRQC) system was introduced in mid 2004. On receiving notice that a ship has applied to join the Hong Kong Shipping Register, MD will assess the conditions of the vessel taking into account the ship age, ship type, number of PSC detention, number of PSC deficiencies, existing flag, existing classification society and accident records of the ship, etc. to see if the ship warrants a PRQC inspection.

9. MD will also check the past survey records of the ship. The owner would be required to authorize the RO to release the survey record on the ship to HKMD. The authorization would be required to be submitted along with the application for registering a ship in Hong Kong.

10. The above information over a period of 3 years will be taken from external sources, such as various MOUs' records and USCG database, etc. Points are allocated for each factor and their sum will give a fair indication of the quality of the vessel.

11. To further safeguard against sub-standard ships joining the Register, a "List of General Concerns" has been given to the ROs for action during change-of-flag survey. The List consists of items which tend to cause detention under port State control inspection. A copy of the current List of General Concerns, which may be updated from time to time, is attached at **Annex 1**. The RO surveyor conducting the change-of-flag survey will be required to submit a declaration to MD within 14 days from completion of his survey to certify that the ship did not have any deficiency listed in the List of General Concerns. A ship with any such deficiency will not be issued with the relevant trading certificate. Format of the surveyor's declaration is attached at **Annex 2**.

12. In some cases, a ship could be refused for registration under the power vested upon the Director of Marine as stipulated in the Merchant Shipping (Registration) Ordinance or if the ship fails the PRQC inspection carried out by MD surveyors. **A fee is chargeable for such PRQC inspection by MD surveyors.** All critical deficiencies discovered during the inspection must be rectified before the Certificate of Registry is issued. In less serious case, RO would be requested to carry out a stringent change-of-flag survey and to supervise the completion of all necessary repair work. After all major outstanding items are completed, the ship will be accepted for registration.

Inquiries

13. Any general inquiries relating to this Merchant Shipping Information Note should be directed to the Senior Surveyor/Security & Quality Assurance, Tel. No. (852) 2852 4503, Fax No. (852) 2545 0556 or email: sqa@mardep.gov.hk.

14. This Note supersedes Hong Kong Merchant Shipping Information Note No. 35/2009 issued on 11 November 2009.

Marine Department
Shipping Division

28 November 2013