INTERCARGO

Port State Control

A guide for ships involved in the dry bulk trades

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Foreword

Port States have had the right to check that visiting foreign ships met the required international safety and pollution prevention standards for many years. Over the last twenty years or so, rather than approaching the task individually, port States have developed regional agreements and now much of the world is covered.

Port State control and the impact it is having on ships, is growing. Port States in their regional groupings are becoming more organised and professional in their approach to ship investigations, and when detentions occur, ships are 'named and shamed' in public. Ships and shipping companies with a history of detentions will begin to find it difficult to trade unhindered.

This guide, supported by diagrams, checklists and other aide-mémoire, attempts to describe port State control practice as it stands today. Advice is given on how to manage an inspection, and on what to do when things go wrong. Specific information is also given into the areas of a ship that are likely to be inspected when its condition, its structural integrity or the operational competence of its crew is checked. Port State control practice continues to vary port-by-port. This Guide focuses on the more onerous practices that exist. An Inspection Reporting Form has been included at the end of this guide for members to use.

Port States have, and continue to make an increasing investment in resources, computer-based systems and training in support of their efforts. In the coming years, the controls imposed on ships by port States are not therefore likely to diminish. Fewer, not more inspections for well-run ships through the elimination of duplicated and unnecessary inspections would, nevertheless, be an honourable goal to aim for.

INTERCARGO would like to see more consistency in the way inspections are carried out, improvements in the targeting of ships, better regional co-operation and exchange of information and the implementation of a common deficiency coding system for all port State control regions to use. Ships with a 'clean' record should be able to move freely between port State control regions without the threat of undue repeat inspections. Ships that have cleared outstanding deficiencies should have their records immediately cleared. The main aim of port State control should be to eliminate substandard shipping and to that end port State control as a means to achieve that, can be supported.

October 2000

Section 1

BACKGROUND

Regulatory Controls on Shipping

The international framework

The United Nations Convention on the Law of the Sea, 1982 (UNCLOS) establishes the general rights and obligations of the flag State. Within the United Nations two specialised agencies deal with maritime affairs, the International Maritime Organization (IMO) (www.imo.org) and the International Labour Organization (ILO) (www.ilo.org), and they have a responsibility for devising and developing conventions and guidelines under which ships can be regulated. In general, matters concerning safety at sea, pollution prevention and the training of seafarers are dealt with by IMO, whereas the ILO deals with matters concerning working and living conditions at sea. While IMO and ILO set the international regulatory framework for ships, each member State bears the responsibility for enforcing the international conventions it has ratified on the ships flying its flag.

The role of the flag State

The international conventions developed by IMO form the main framework of safety, training and pollution prevention regulation, with SOLAS, MARPOL, STCW, Tonnage Measurement and Load Line conventions being the key regulations. These are supported by classification rules that largely focus on the structure of the ship, including the materials used in its construction, the size of scantlings and essential engineering systems like the main engine. Classification and convention requirements can be inter-related. The issuing of Load Line and Cargo Ship Safety Construction certificates would require, for example, the ship to be built and maintained to class rules.

Evidence that convention standards and classification rules have been met is generally provided by the presence on board of valid certificates. To ensure that a ship meets and then subsequently maintains convention standards, a flag State needs to have in place arrangements for ensuring that its ships are periodically surveyed and re-certified. This responsibility applies regardless of whether a flag State carries out its own surveys using its own surveyors or authorises a Recognised Organisation (RO) to conduct surveys and issue international certificates on its behalf.

The member societies of the International Association of Classification Societies (IACS) (www.iacs.org.uk) meet the minimum standards required of an RO. In many cases therefore, it would be a class surveyor who undertakes all the certification work on board ship.

The rights of a port State

In practice, many ships do not regularly call at flag State ports and this can restrict the ability of the flag State to effectively police and enforce convention standards on its ships. This encourages some ships to sail in a substandard condition, endangering other ships, the lives of seafarers as well as the environment.

Coastal States have certain rights to exercise authority over ships in their waters. In addition, a port State has the authority to check that foreign ships visiting its ports meet all the appropriate convention standards. Indeed, the origins of port State control can be traced back to the 1929 SOLAS Convention. Convention control provisions can now also be found in MARPOL, the Load Line Convention, STCW and the ILO Convention No. 147.

A port State can, however, only apply those conventions which have entered into force, and which it has implemented for its own ships. Ships that fly the flag of a State that has not ratified a convention, or are below convention size would not, however, be exempt from inspection because the principle of *no more favourable treatment* would be applied.

A State may also enact its own domestic laws and impose additional national rules and regulations on foreign ships entering its waters. The United States, for example, has enacted the Oil Pollution Act, 1990 (OPA 90).

The existence of convention control provisions and national rules, coupled with the general desire of port States to ensure that visiting ships are safe and unlikely to pollute their waters, forms the background to port State control.

Development of Port State Control

The development of regional port State control agreements

In Europe the increased interest in the growing number of foreign flag ships calling at its ports led eight North Sea States agreeing to exchange information on foreign ships in 1978. This was superseded in January 1982 when 14 European States agreed to establish a harmonised system of control resulting in the signing of the Paris Memorandum of Understanding (MOU) on Port State Control, now often and simply referred to as the “Paris MOU”.

Since that date, the number of States in the Paris MOU has grown. This has mainly been due to the increase in the number of member States of the European Union (EU), and that EU Directive 95/21/EC now places a legal requirement on all EU member States to carry out port State control inspections. Canada to the west and the Russian Federation to the east also participate as members of the Paris MOU.

In the Far East, another large regional grouping of States exists. This is known as the Asia-Pacific or Tokyo MOU and while it also includes the participation of Canada and the Russian Federation, it largely involves western Asia-Pacific rim States and stretches from China in the north to Australia and New Zealand in the south.

The Asia-Pacific (Tokyo) MOU came into being in the early 1990's some ten years after the Paris MOU was formed. About the same time the South American States, along with Mexico and Cuba, formed the Vina del Mar (Latin American) Agreement.

The end of the 1990's has also seen the establishment of regional MOUs in the Caribbean, the Mediterranean and Indian Ocean. The Indian Ocean MOU, a regional grouping of States stretching westwards from India to South Africa, also includes Australia. The West and Central African (Abuja) MOU has also recently been established with a Secretariat based in Nigeria, as has the Black Sea MOU. Its Secretariat is to be based in Istanbul, Turkey. The member States of both MOUs remain to be finalised. A further MOU is planned to cover the Arabian Gulf region.

The United States has, however, chosen to remain outside of any regional MOUs grouping. Under the US Port State Control Program, it undertakes control measures on a unilateral basis.

Table 1 provides a geographical overview of the port state control regions with established Secretariats. It lists the member States that are currently signatories and can therefore be considered port State control active. *Table 2* provides the contact details of the Secretariats.

The rules that govern port State control activities

In November 1995, IMO adopted resolution A.787(19) – Procedures for port State control. The resolution was amended in 1999 by resolution A.882(21) and will no doubt be further amended in the future. The Procedures are intended to provide basic guidance on how port State control inspections should be conducted and how to identify deficiencies in a ship, its equipment, or its crew, with the purpose of ensuring that convention control provisions are consistently applied across the world from port to port.

The Procedures are not mandatory and only offer guidance to port States, albeit guidance that has been developed and agreed internationally. While port State regions should use the Procedures when exercising port State control, in practice variations in the way the Procedures are interpreted exist.

For example, if convention control provisions were strictly interpreted, a routine or general inspection would be limited to a check on the validity of the ship's certificates, except in cases where the condition of the ship was in doubt. It is, nevertheless, often argued that the presence of certificates is only evidence of, and not conformation of convention standards being met. For this reason, some Port State Control Officers (PSCOs) are likely to want to inspect more than just the ship's certificates while undertaking routine port State control inspections.

Table 1 Geographical overview of the port State control regions

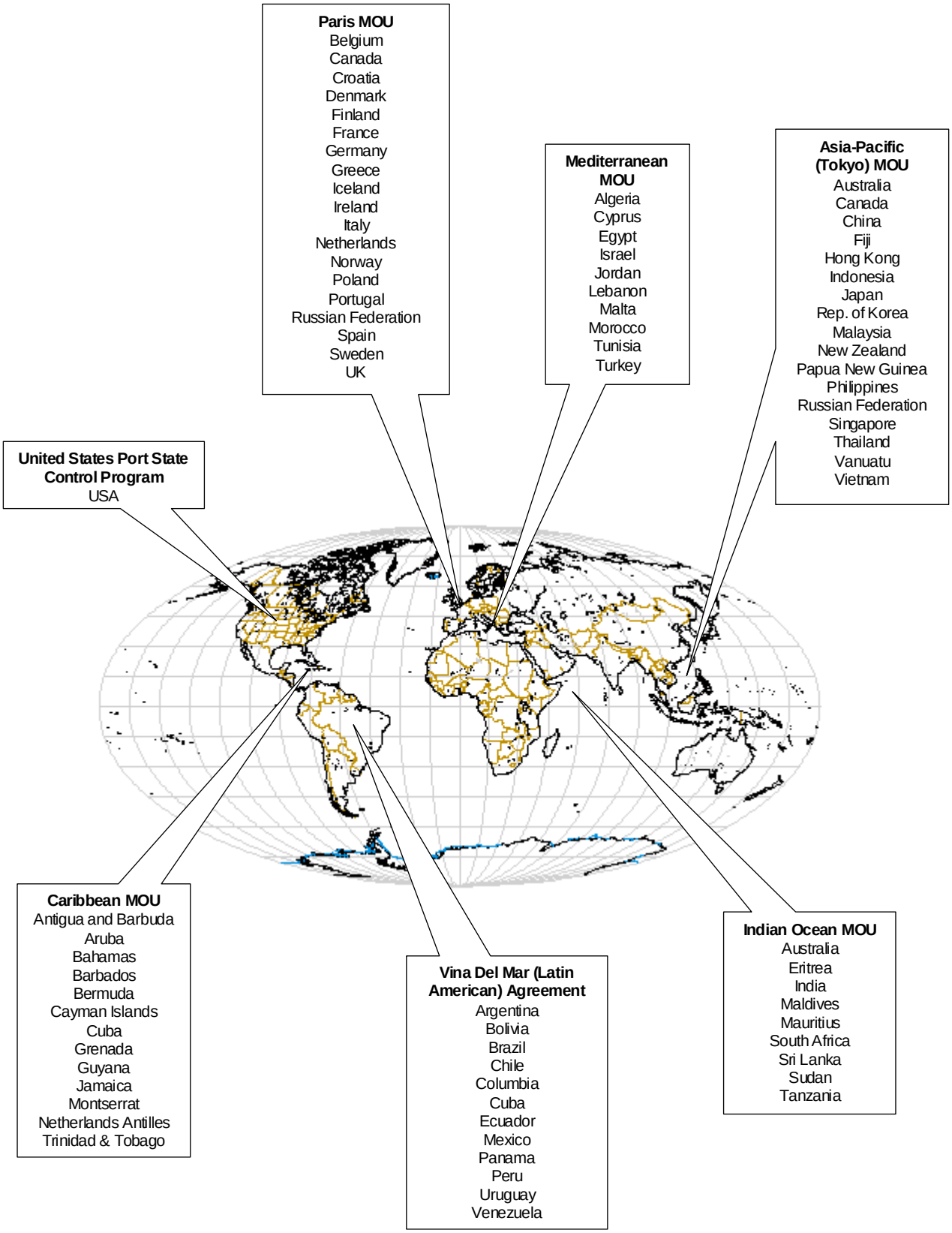

Table 2 Contact details of the regional port State control Secretariats

Paris MOU
Paris MOU Secretariat
P.O. Box 20904
2500 EX The Hague
Netherlands

Tel: +31 70 351 1508
Fax: +31 70 351 1599
E-mail: office@parismou.org
Web: www.parismou.org

Vina Del Mar (Latin American) Agreement
Vina del Mar Agreement Secretariat
Prefectura Naval Argentina
Av. Eduardo Madero 235
1106 Buenos Aires
Argentina
Tel: +54 11 4318 7433
Fax: +54 11 4318 7547
E-mail: ciala@acuerdolatino.int.ar
Web: www.acuerdolatino.int.ar

Caribbean MOU
Secretariat Caribbean MOU
Ministry of International Transport
Adriana's Complex
Warrens, St. Michael
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Tel: + 1 246 425 0034 / 0072
Fax: + 1 246 425 0101
E-mail: caribbeanmou@sunbeach.net

Indian Ocean MOU
Indian Ocean MOU Secretariat
Head Land, Sada
Vasco da Gama
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India
Tel: +91 832 520931
Fax: +91 832 520045
E-mail: iomou@goa1.dot.net.in

Asia-Pacific (Tokyo) MOU
Tokyo MOU Secretariat
Tomoecho Annex Building 6F
3-8-26 Toranomon, Minato-ku
Tokyo 105-0001
Japan
Tel: +81 3 3433 0621
Fax: +81 3 3433 0624
E-mail: tmou.okada@nifty.ne.jp
Web: www.iijnet.or.jp/tokyomou

US Port State Control Program
USCG Headquarters' Port State Control
Branch, Commandant (G-MOC-4)
2100 Second Street, S.W.
Washington DC 20593-0001
USA
Tel: + 1 202 267 2451
Fax: + 1 202 267 0506
E-mail: psix@comdt.uscg.mil
Web: www.uscg.mil/hq/g-m/psc/psc.htm

Mediterranean MOU
Mediterranean PSC Secretariat
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Egypt
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Section 2

THE SELECTION OF SHIPS FOR INSPECTION

A port State control authority undertakes inspections to satisfy itself that the foreign ships visiting its ports meet the required international standards laid down in the conventions, and to check on the actual condition of specific ships whose ability to meet those standards is in doubt.

Port States however recognise that inspecting all foreign ships would be both impractical due to the resources it would take, and unnecessary since not all ships are substandard. The general approach taken by regional port States authorities is to set overall percentage *inspection rates* to ensure that a minimum number of ships are inspected, and to use *targeting factors* to focus inspection effort on those ships most likely to be substandard. In addition, ships of a certain age and type are specifically selected for the purpose of conducting *expanded inspections*, and *concentrated inspection campaigns* are conducted to check on special matters or areas of concern.

To help port States identify suitable ships for inspection, port arrival listings, shipping schedules and ship position reports are monitored. Central regional databases such as the SIRENAC and APCIS databases managed by the Paris and Tokyo MOUs respectively are also used by port States to access data on ships, including reports of previous inspections. While such databases only hold information and inspection reports on ships that have undergone an inspection within any one region, international databases also now exist where port State control information from all the regions is consolidated and published.

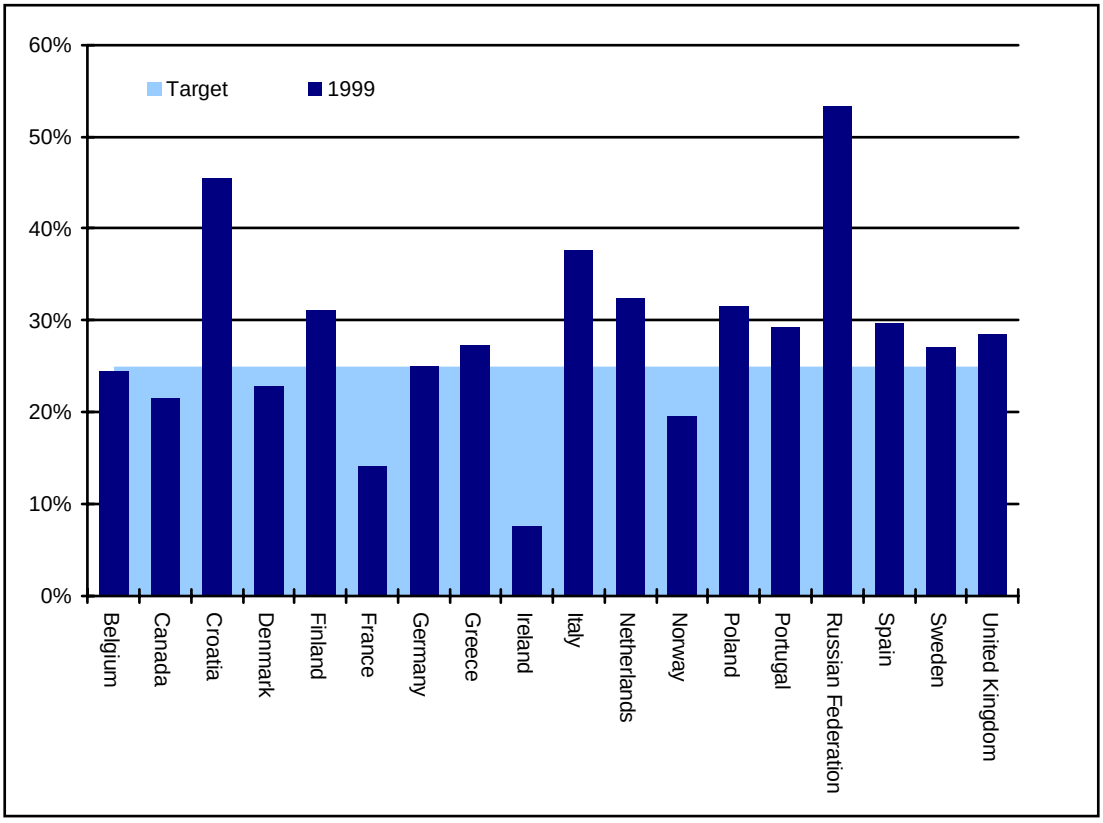
EQUASIS (www.equasis.org) is one such database. The European Commission and a number of quality-minded maritime administrations (France, Japan, Singapore, Spain, the UK and the US) established EQUASIS in 2000.

Inspection Rates

These are decided regionally and are designed to ensure that a minimum number of different foreign ships are inspected each year. Because some ports or States have more PSCOs than others, the inspection rate will often vary port-to-port. However an annual inspection rate, normally expressed in percentage terms, is set for the whole region. The Paris MOU, for example, currently has an annual inspection rate of 25%.

Selection based purely on numbers can not, of course, differentiate between good and substandard ships. Port States are now starting to consider weighting ship inspection rates according to the target factor assigned to the ships they inspect. Ships with a high target factor would count as more than one inspection (say 1.2 inspections) whereas a ship with a lower factor would count as less than one (say 0.8 inspections). By focusing on the selection of ships with high target factors, the agreed inspection rate for the region can be achieved by visiting less ships, and result in the resources of the port State being focused more efficiently, to the benefit of well-run ships.

Inspection efforts of members compared to target:



[Source: 1999 Annual Report of the Paris MOU]

Targeting

Certain selection criteria such as the ship's flag, age and type, are believed to directly influence how well a ship is likely to be operated and in what condition a ship is likely to be found. By allocating points to each criteria a scoring system can be employed and a ship can be assigned a targeting factor. The Paris MOU, for example, assigns an *overall targeting factor* to ships, whereas the US Coast Guard (USCG) has developed a *boarding priority matrix* for the purpose of calculating a targeting factor. Up-to-date information on the targeting factors used by the various port State regions is widely published, including on their respective web sites. Refer to *Table 4*, at the

end of this section, for a copy of the USCG Boarding Priority Matrix published in its 1999 Annual Report.

Owner / operator

The USCG, in particular, target owner / operators of ships with a bad detention record. A Shipowners' List is updated regularly and published on its web site.

Charterer

There are also moves to identify publicly the charterers of ships that have been detained. As more information is collated concerning charterers then that criteria may also become a regular factor used in the targeting of ships.

Flag

Three-year rolling average tables of above average detentions are published annually by the main port State regions. Ships of flag States whose detention ratios exceed average detention ratios for all flag States can expect to be especially targeted, as can ships from the flag States that have not ratified the main conventions. In some cases, the port State control Authority might consider the fact that a ship was registered to a targeted flag State as *clear grounds* for proceeding directly, on boarding, with a more detailed inspection of the ship.

List of Targeted Flag States:

Flag State	Detention Ratio	Flag State	Detention Ratio
Antigua & Barbuda	5.59%	Philippines	5.14%
Belize	50.56%	Russia	5.83%
Cyprus	8.19%	Saint Vincent and the Grenadines	11.43%
Honduras	39.06%	Thailand	7.23%
India	8.94%	Turkey	11.41%
Malta	6.70%	Vanuatu	7.84%
Panama	6.92%	Venezuela	13.95%

Note:The USCG identified the above flag State Administrations as having a detention ratio higher than the overall average and were associated with more than one detention in 1999. The detention ratios are based on data from the previous three years (1997, 1998 and 1999). The 3-year overall average for the 2000 evaluation was 5.05%, down from 6.00% in 1999.

[Source: The USCG 1999 Port State Control Report]

Classification society

Class-related detention figures for each classification society are also compared against the average figure. Ships classed with a society that has a poor detention ratio would be most affected, as would ships classed by a society that was not a member society of IACS.

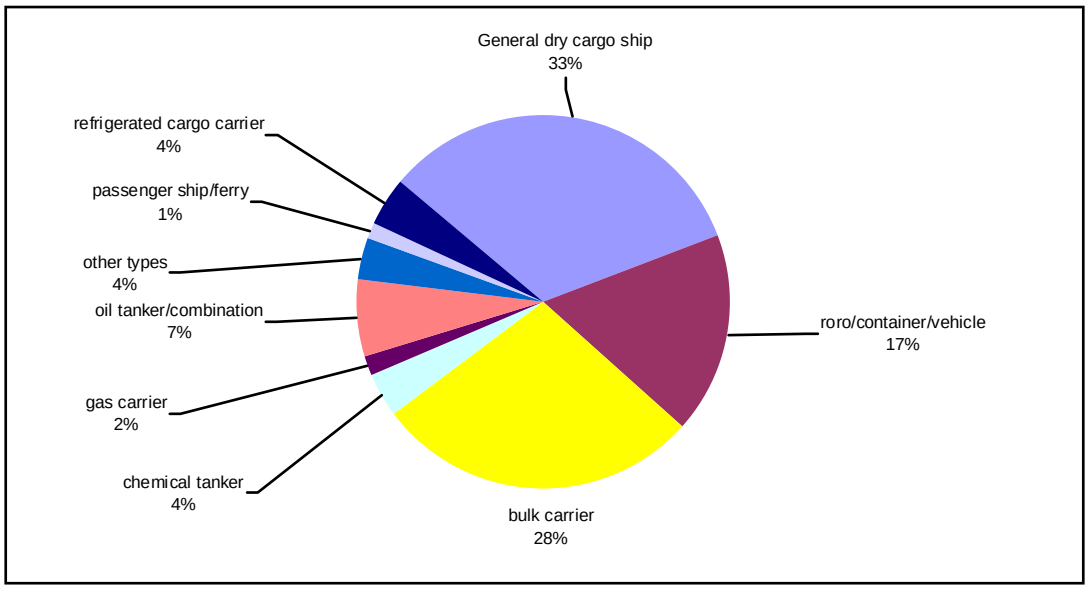
History

Ships visiting a port State region for the first time or after an absence of at least 6 months would be likely to receive particular attention, as would ships with outstanding deficiencies and a record of detentions. A ship that has been specifically permitted to sail to another port to rectify deficiencies would also be targeted should it not arrive at that appropriate port within an agreed or reasonable period of time.

Ship type and age

These criterion generally follow those used to decide whether or not a ship is of a type or age to justify it undergoing an *expanded inspection*. In general, tankers (oil, gas and chemical), bulk carriers and passenger ships are the ones likely to be targeted for such inspections. Any ship over 10 years old should also expect to be targeted.

Type of Ship Inspected:



[Source: 1999 Annual Report on Port State Control in the Tokyo MOU]

Expanded Inspections

Oil and chemical tankers, gas carriers, passenger ship and bulk carriers are often recognised as types of ships that should be subject to specific regular, usually 12 month inspections. The PSCO would use the *initial inspection* to verify the age and type of ship, as this information would be contained on the ship's certificates. With respect to bulk carriers, those over 12 years old can be expected to have to undergo annual expanded inspections by some but, currently, not all port States.

The items that would be considered as part of an expanded inspection are listed in *Table 5*. Accompanying the item list are guidance notes based upon those for PSCOs to use when undertaking an expanded inspection of a bulk carrier – see *Table 6*. Both tables follow this section.

If the condition of the hold and hull structure during the expanded inspection give rise to concern, the PSCO is expected to consult with the ship's flag State / classification society with a view to deciding whether or not a more detailed survey should be undertaken.

Concentrated Inspection Campaigns

Concentrated inspection campaigns have been a particular feature of the Paris MOU in recent years, and are also now starting to be conducted by the Tokyo MOU. They focus on specific areas where high levels of deficiencies have been encountered by PSCOs, or where new convention requirements have recently entered into force. The Paris MOU has so far always announced its campaigns well in advance, both in the press and on its web site.

The campaigns have typically been concentrated over periods of about 3 months and recent campaigns have centred on the 'oil record book', 'living and working conditions on ships', the 'implementation of the ISM code for phase-one ships', 'bulk carrier safety' and 'oil tankers older than 15 years'. Campaigns regarding 'cargo securing manuals' and the 'implementation of the ISM code for phase-two ships' are expected to follow.

Overriding Factors

Irrespective of targeting factors, campaigns and the like, there are a number of circumstances or *overriding factors* that would take a ship to the top of the inspection list and would result in the PSCO proceeding directly to a more detailed inspection of the ship.

Ships that have been reported

Ships that have been reported by a pilot, port authority or another State can expect to be directly targeted. Other complaints could similarly result in the ship being specifically targeted. While a complaint could originate from the ship, or any other person or organisation with a legitimate but external interest in the ship, the PSCO is not required to reveal his source and has no legal obligation to do so.

Ships reported as having outstanding deficiencies

Where a PSCO has allowed the ship to sail on condition that deficiencies are rectified within a period of time, usually 14 days, this stipulation will be recorded in the regional port State database to be followed up in another port.

Where operational concerns about a ship exist

Operational incidents that could give rise to an inspection include:

- collision, grounding or stranding on the way to the port:
- an alleged pollution violation;
- erratic or unsafe manoeuvring, particularly around routeing measures or where safe navigation practices and procedures have not been followed;
- failure to comply with reporting procedures; or
- the emission of a false alert that was not followed by proper cancellation procedures.

Ships suspended from class

Ships that have been suspended or withdrawn from their class for safety reasons in the previous 6 months could expect to be inspected.

Table 3 Diagram showing the selection process

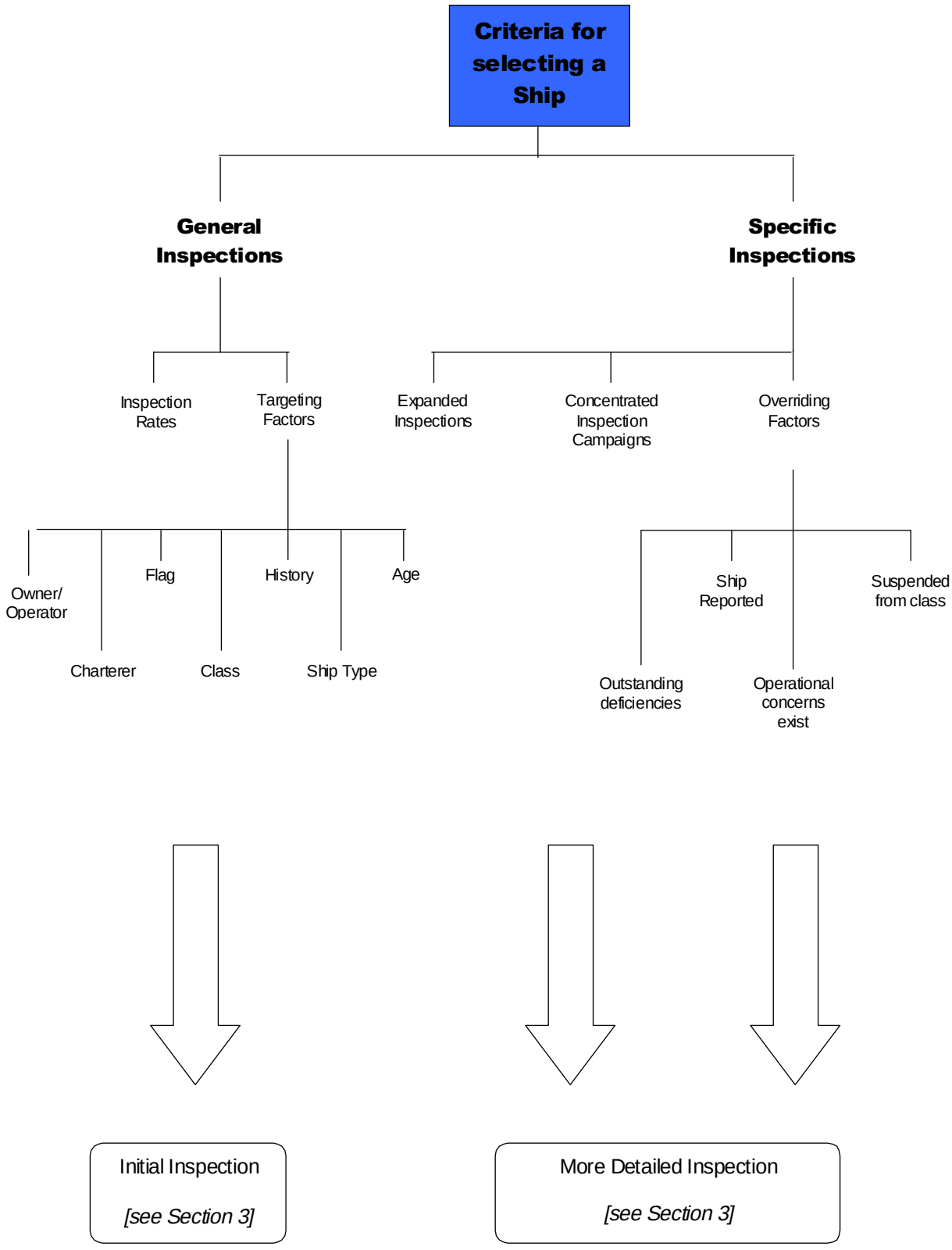


Table 4 USCG Boarding Priority Matrix

OWNER	FLAG	CLASS	HISTORY	SHIP TYPE
5 Points	**7 Points**	**Priority 1**	**5 Points Each**	**1 Point**
Listed owner or operator	Listed Flag State	>10 arrivals with detention ratio more than 4 times the average **OR** <10 arrivals and involved with at least one detention in the previous 3 years.	Detention within the previous 12 months.	Oil or chemical tanker
		5 Points >10 arrivals with a detention ratio between 3 & 4 times the average.	**1 Point Each** Other operational control within the previous 12 months	**1 Point** Gas carrier
		3 Points >10 arrivals with a detention ratio between 2 & 3 times the average.	**1 Point Each** Casualty within the previous 12 months.	**2 Points** Bulk freighter over 10 years old.
		1 Point >10 arrivals with a detention ratio between the average and twice the average.	**1 Point Each** Violation within the previous 12 months.	**1 Point** Passenger ship
		0 Points >10 arrivals with a detention ratio below the average **OR** <10 arrivals with no detentions in the previous 3 years.	**1 Point Each** Not boarded within the previous 6 months	**2 Points** Carrying low value commodities in bulk.

Priority	Matrix points	Restrictions / risk
I	17 or more	Port entry may be restricted until ship is inspected
II	7 to 16	Cargo operations may be restricted until ship is inspected
III	4 to 6	No operational restrictions imposed, ship will most likely be examined at the berth
IV	3 or fewer	Ship is a low risk, and will probably not be boarded

[Source: The USCG 1999 Port State Control Report]

Table 5 Expanded inspection of a bulk carrier

1	Black-out and start of emergency generator, inspection of emergency lighting	☐
2	Operation of emergency fire pump with two (2) fire hoses connected to the fire main line	☐
3	Operation of bilge pumps	☐
4	Closing of watertight doors	☐
5	Lowering of one seaside lifeboat to the water	☐
6	Test of remote emergency stop for boilers, ventilation systems and fuel pumps	☐
7	Testing of steering gear including auxiliary steering gear	☐
8	Inspection of emergency source of power to radio installations	☐
9	Inspection and, to the extent possible, test of engine room separator	☐
10	On deck: ▪ corrosion of deck machinery foundations ▪ corrosion / waste of weather-tight doors and closing devices ▪ cracks in deck plates ▪ corrosion of pipes and ventilators ▪ cracking at bulwark stay ▪ cracking at hatch coaming bracket toes ▪ deformation and/or corrosion of hatch covers ▪ buckling of cross decks between hatches	☐
11	In the holds: ▪ in the side shell plating - cracks / leaks in welds or plating, distortion of plating ▪ at the connection of bulkhead plating to the side shell – punctured, cracked, heavily indented or buckled plating, corrosion and wastage ▪ at the connection of side shell frames and end brackets to the shell and the hopperside / topside tank plating – cracks, corrosion and wastage, excessively deformed or detached frames or brackets	☐
12	Access to cargo holds	☐
13	Check of the Survey Report File to identify possible suspect areas requiring inspection	☐

[The following items are likely to be specifically checked as part of an expanded inspection for a bulk carrier by a PSCO from the Paris MOU]

Table 6 Guidance notes for an expanded inspection of a bulk carrier

1 The initial check of the Survey Report File by the PSCO might identify possible suspect areas requiring inspection. IMO resolution A.744(18) requires a specific survey programme that includes access arrangements, and the requirements for close-up survey and thickness measurements. The Survey report File held on board should therefore consist of:
- reports of structural surveys;
- condition evaluation reports;
- thickness measurement reports; and
- survey planning documentation containing:
  - main particulars of ship, plans of tanks and holds;
  - list of tanks and holds and their usage, corrosion protection, condition of coating and corrosion risk in tanks; and
  - design risk of structures.

2 The impression of hull maintenance and the general state on deck, the condition of items such as ladders, hatches, air pipes, guard rails and deck machinery and any visible evidence of previously effected repairs could influence the PSCOs decision as to what extent any examination of the hull structure should take.

3 The PSCO is likely to pay special attention to areas of high stress and bending moments:
- immediately forward of the engine room bulkhead;
- over the midships half-length; and
- #1 hold side shell framing and top and bottom connections in the panting region.

4 Particular attention is also likely to be given to areas where fracturing, cracking, distortion or excessive wastage can occur. Further, the watertight integrity of hatches and closures is particularly important on ore carriers with no reserve buoyancy.

5 Common defects are:
- cracking at hatch corners and coamings;
- plate panel buckling of cross deck strips;
- cracking at the intersection of the inner bottom and hopper plating;
- grab and bulldozer damage to the main frames lower brackets;
- grab damage to the inner bottom plating, hopper and lower stool plating;
- cracking at main frame bracket toes;
- general and localised corrosion of main frames and brackets;
- cracking at fore and aft extremities of the topside tank structures;
- corrosion within topside tanks; and
- general corrosion and cracking of transverse bulkheads.

6 Permanent seawater ballast tanks represent one of the most likely problem areas. Any inspection could be expected to consider the following aspects:
- the paint condition in coated ballast tanks and the condition of the anodes. In ballast tanks rates of corrosion of the order 1mm per year may be encountered, depending on whether tanks are coated or protected by anodes. In some ships only the ullage space is coated with the remainder protected by anodes, and this can result in corrosion on uncoated structures which remain wet during empty periods;
- in tanks used for ballast, which may be subject to variable depths of seawater, such as the forepeak tank, it would often be the case that there is little wastage top and bottom, but significant wastage over central regions. The PSCO can be expected to pay particular attention in the forepeak to longitudinal stiffeners and brackets where the collision bulkhead adjoins the shell plating;
- longitudinal shell stiffeners in dedicated ballast tanks, particularly in areas adjacent to bulkheads and web frames; and
- underdeck longitudinals in ballast tanks. Wastage would usually be most severe close to the deckhead. This might result in the fillet welds attaching longitudinals to the deck being wasted leading to the detachment of longitudinals and the consequential bulking of deck plates.

7 Where a fracture, which has not been caused by contact damage, is found by the PSCO in the main hull structure on one side of a ship, he can be expected to examine the corresponding structure on the opposite side to see if a similar failure has occurred. Fractures of this nature are of concern especially where corrosion is associated with the failure and might have been a contributing factor.

8 If relevant, the PSCO might also check that the necessary calculations have been made to ensure bending and shear stresses are maintained within maximum limits during both cargo operations and the ensuing voyage. This would be especially important where high-density cargoes are carried or where the loading / ballasting arrangement is of a different configuration to that described in the ship's loading manual.

Section 3

THE INSPECTION PROCESS

All port State control visits to a ship should start with the PSCO conducting an initial inspection, unless *overriding factors* exist to allow the PSCO to proceed directly to a more detailed inspection. If during that initial inspection the PSCO finds evidence of a major problem with the ship, its crew or its operation, the PSCO would have *clear grounds* for proceeding to a more detailed inspection of the ship with a view to establishing its real condition. The existence of a concentrated inspection campaign or an expanded inspection programme would also effectively result in the PSCO undertaking a level of inspection, over and above that required of an initial inspection. Deficiencies may be identified at any stage of the inspection process, and a detention order might follow.

Inspection interval

If a ship has had a port State inspection within the last 6 months and was reported as having no outstanding deficiencies i.e. inspection recorded using Report Form A, the ship should be exempted from further inspection unless there are special reasons that warrant another inspection. In practice, evidence indicates that ships are often re-inspected at intervals of less than 6 months, particularly when a ship moves between port State regions.

Accidental damage prior to port entry

It is important that the master, at the earliest opportunity, reports to the flag State or the classification society responsible for issuing the ships' certificates, any accidental damage to the ship while on route to the port. It is also important that the master or shipowner, prior to entering port, submits a report to the port State stating the circumstances of the accident and the nature of the damage suffered, if grounds for detention are to be avoided. Plans for appropriate remedial action should also be put into place, and the port State notified once the remedial action has been completed.

Charging for inspections

The port State should not charge the ship for any general inspection. Port State charges can however be expected if the ship invites a port State to undertake an inspection, or if the ship is detained and the PSCO has to return to the ship for a re-

inspection. To avoid unnecessary charges, the ship should therefore ensure that all deficiencies are properly rectified before requesting a re-inspection. Charges might also be incurred if a PSCO attends the ship because of the presence of overriding factors. This is because the triggering action implies that doubts about the ship exist causing an inspection to be necessary.

Contacting the flag State / classification society

A ship might wish to contact its flag State / classification society for support during an inspection, particularly if the ship was detained or an inspection was suspended by the PSCO. In order to prepare for such an event, it might be prudent for the master to know under which circumstances a surveyor should be called in and for a list of contact addresses to be maintained.

Preparing for an Inspection

Because inspections are unannounced it is difficult for a ship to make any special preparations for an inspection, except in cases where one could be anticipated. A ship should therefore be ready to face an inspection at any port, at any time.

The Port State Control Officer

The PSCO should be an experienced person qualified as a flag State surveyor and able to communicate with the master and key crewmembers in English. He need not, however, have sailed as master or chief engineer or have had any seagoing experience. He should have no commercial interest in the port, the ship or be employed by or on behalf of a classification society. Should he lack the necessary expertise in some area of inspection an expert in that field could assist him.

The PSCO is issued with an identity card as evidence of his authority to carry out inspections. All PSCOs should also carry a copy of the General Procedural Guidelines for PSCOs from IMO resolution A.787(19) for ready reference when carrying out inspections. *Table 8*, at the end of this section, reproduces these guidelines.

Dealing with the PSCO

It is probably best assumed that the PSCO is fully qualified, well-trained and familiar with ships although of course this may not always be the case. The master should select a room for the initial meeting that is quiet, comfortable and have all the certificates and documentation readily available. The reports of previous port state

inspections should also be at hand. All questions asked by the PSCO should be responded to in an honest and straightforward manner.

When the PSCO is ready to make an inspection of the ship, a senior and knowledgeable officer should be assigned to accompany him. That person should be familiar with the ship and have the necessary keys with him so ensuring that ready access to all spaces is possible. If a spare crewmember or a cadet is available, his attendance is also recommended. If things need immediate attention or assistance needs to be called, that person can attend to such matters and the flow of the inspection can remain unaffected.

The officer should be vigilant and not afraid to point out and immediately rectify discrepancies that appear during the inspection, rather than risk the PSCO identifying the discrepancies himself. Being able to fix things on the spot is an indication of being well organised. Even if something does not work or needs adjusting but can not be fixed immediately, move on and let the PSCO return later. This could save a second visit to the ship.

Finally, it must be remembered that the master always has the right to query the direction that an inspection is taking should he believe that the inspection could interfere with the safety of the crew or indeed cause crew fatigue. Unreasonable requests for drills while the ship is cargo handling or bunkering should always be questioned.

Initial Inspection

First impressions

Before boarding the PSCO is likely to walk along the quay and look at the general condition of the ship, the state of the mooring lines and whether or not the draught and load line marks are present and readable. The condition of the paintwork, signs of corrosion, tank leakage or unrepaired damage would give the PSCO an immediate impression of the standard of maintenance on board.

Walking on board, the PSCO can check the condition of the gangway and how well it is rigged and secured. Being able to walk on board and wander around freely and uncontested, apart from indicating lax deck operations would also give the PSCO the opportunity to take a good and unsupervised look around the ship. If cargo operations are underway, he may then have an opportunity to judge the managerial competence of those running the ship, by the apparent level of organisation on deck. On the way to the masters' office the PSCO may, subject to where the gangway was rigged, have further opportunity to look at the onboard mooring arrangements and parts of the accommodation space.

Certificate check

Subject to favourable first impressions, the initial inspection should largely be limited to checking the ship's certificates and manning arrangements. A more detailed inspection would require clear grounds to be present. It is however becoming common practice for the PSCO to also want to walk around the ship with the aim of attempting to assess the overall condition of the ship and to check that the ship actually conforms to the conditions required by the certificates issued to it.

If the PSCO does not already know, he would first ask the age and size of the ship to determine which certificates were applicable to the ship, before checking them to ensure that they were all on board, up to date and correctly endorsed. Deficiencies related to overdue statutory surveys are common. Certificates issued by non-recognised organisations might also attract particular attention.

The principle of *no more favourable treatment* would be applied to ships that fly the flag of States that have not ratified a convention, or are below convention size. This might mean that a ship was not carrying all the certificates required under the conventions relevant to the port State region. Absence of certificates should not, in itself, however constitute reason to detain a ship, as long as the ship was in substantial compliance with the provisions of the relevant conventions.

A close examination of the Oil and Garbage Record Books and the ship's ISM certificates can be expected at this stage. A ship holding interim ISM certificates should expect a particularly close examination and an attempt might be made to verify that the ship has a functioning safety management system. In the absence of valid ISM certification, the ship may have a banning order placed on it.

The PSCO can also be expected to look specifically at the manning arrangements on board. The numbers and composition of the crew would need to conform to the Safe Manning certificate carried. The master should be aware that the port State has the right to query the manning arrangements of any ship with its flag State, and ask for confirmation from the flag State that the ship can sail as manned. Failure of the flag State to confirm can result in the ship being detained. The PSCO should accept the flag State's manning level unless it is clearly unsafe or does not meet STCW requirements.

Regarding the crew and their certificates, the STCW Code requires that the original copies of certificates and endorsements be carried on board at all times. Photocopies would not be acceptable. The PSCO might wish to check that individual crewmembers actually have their certificates with them. Medical certificates may also be checked at this time.

At the end of this section, *Table 9* contains details of the certificates and documents that dry bulk cargo ships need to carry.

"Walk around" to check on the overall condition of the ship

During the walk around, if the PSCO starts off finding little wrong, the inspection is likely to be concluded fairly rapidly. A check on the internal structure of the ship would not normally be undertaken, the PSCO being more likely to rely instead on visual signs to see if equipment is being regularly used and tested.

Paint in the davits or rusted harbour pins could, for example, indicate that the lifeboat had not been recently lowered and this might conflict with statements in logbooks concerning the carrying out of boat drills. Discrepancies of this nature could encourage the PSCO to believe that clear grounds existed and ask for a drill to be conducted. This would in turn provide opportunities for the PSCO to communicate with crewmembers and to see how well the crewmembers communicate together.

The PSCO would also be likely to check on the living and working conditions on board with a view to verifying that the ship conformed to the standards laid down in the ILO No.147, Merchant Shipping (Minimum Standards) Convention.

At the end of the section, *Table 10* contains a brief aide-mémoire that lists those areas that a PSCO can be expected to want to see during an initial inspection.

Clear Grounds

Clear grounds for proceeding to a *more detailed inspection* exists if, during the initial inspection the PSCO found evidence that:

- the ship, its equipment, or its crew did not appear to correspond substantially with the requirements of the relevant conventions; or
- the master or crewmembers were not familiar with the essential shipboard operational procedures that related to the safety of the ship or pollution prevention.

Once the PSCO believes that a more detailed inspection is justified he is required to inform the master giving reasons for his decision. At the end of the section, *Table 11* lists examples of what might constitute clear grounds. The checklists contained in *Section 5* focus specifically on essential shipboard operations.

More Detailed Inspections

A more detailed inspection is an in-depth inspection covering the ship's construction, equipment, manning, living and working conditions and compliance with on-board operational procedures. The purpose of a more detailed inspection of the ship is to

establish its real condition where doubts exist. It may be prompted by *overriding factors* or because *clear grounds* were identified during the initial or an expanded inspection of the ship.

The nature and extent of the inspection required would determine how many PSCOs were needed to attend the ship for the inspection. Inspections can involve more than one person.

While at first instance the inspection should focus only on the areas of original concern, it is often expanded to check that essential shipboard operations are capable of being properly carried out by crewmembers.

Any inspection should not unnecessarily delay or impose undue physical demands on the ship that could jeopardise safety. While the master would be entitled to query excessive inspection demands, particularly those that could interfere with the running of his ship, it is recommended that the master always remains positive and co-operative in his dealings with the PSCO.

Suspension of an Inspection

In exceptional circumstances, where the overall condition of a ship, its equipment or the working or living conditions of the crew were found to be obviously substandard, the PSCO may suspend an inspection. In such cases, the port State should notify the flag State of the suspension without delay. The suspension would continue until the deficiencies identified by the PSCO have been rectified, as instructed.

Reporting Inspection Results

Following a port State control inspection, the PSCO should provide the master with a report giving the results of the inspection, detailing any action to be taken. It will be either “Report Form A”, if no deficiencies are found, or “Report Form B” where deficiencies exist. If a ship is detained, this will be recorded on both forms. All reports should be retained on board for at least two years and be kept readily available for examination by a PSCO at subsequent inspections.

After a ship inspection, the results are recorded in the central database of the port State region to which it is a member. The SIRENAC database, for example, records the results of ship inspections of the member States of the Paris MOU. This allows information about ships to be shared between all member States. Information is also disseminated through international databases such as EQUASIS, web sites and in the shipping press.

Table 7 Diagram showing the inspection process

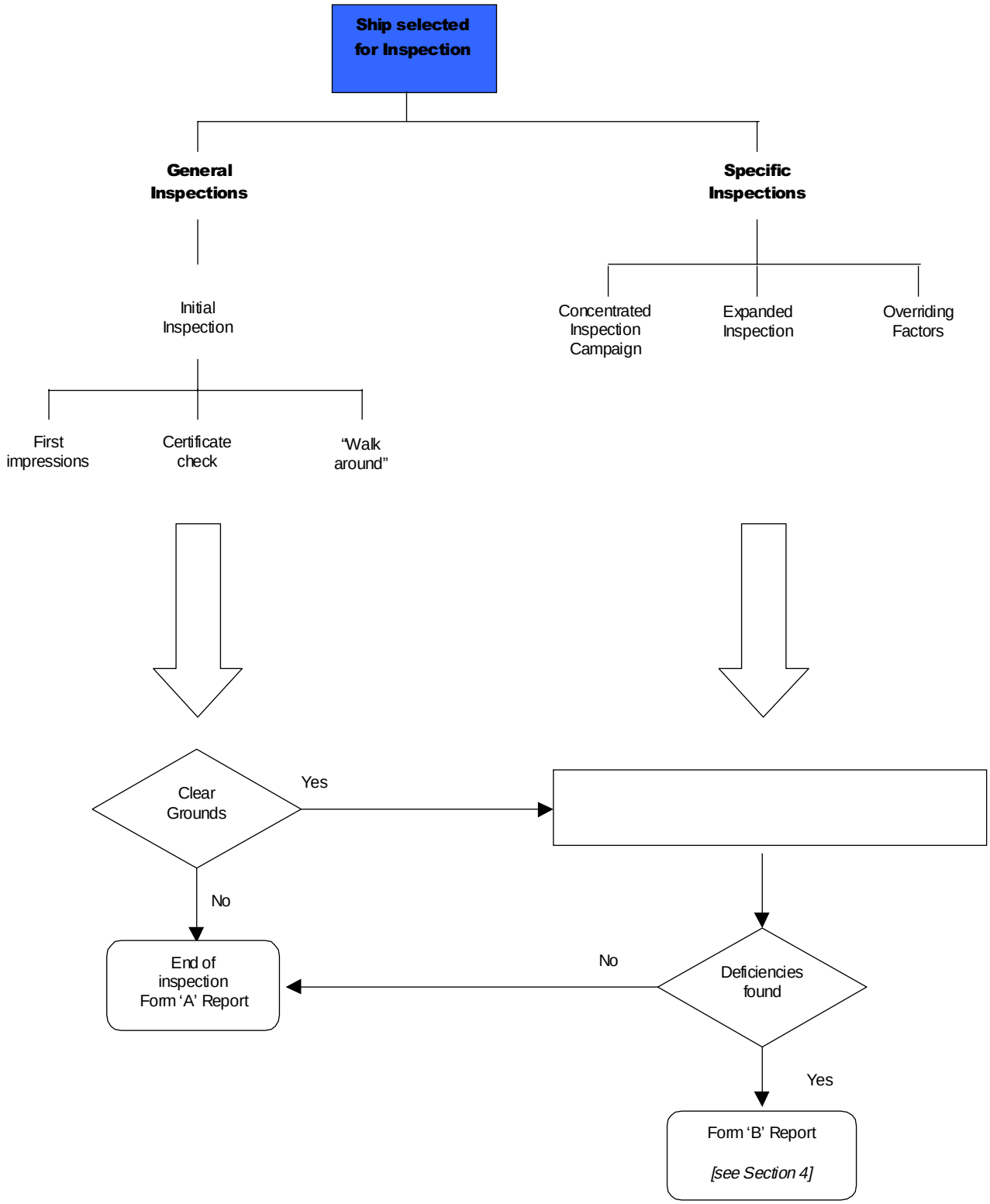


Table 8 General Procedural Guidelines for PSCOs

2.6.1 The PSCO should use professional judgement in carrying out all duties, and consider consulting others as deemed appropriate.

2.6.2 When boarding a ship, the PSCO should present to the master or to the representative of the owner, if requested to do so, the PSCO identity card. This card should be accepted as documentary evidence that the PSCO in question is duly authorised by the Administration to carry out port State control inspections.

2.6.3 If the PSCO has clear grounds for carrying out a more detailed inspection, the master should be immediately informed of these grounds and advised that, if so desired, the master may contact the Administration or, as appropriate, the recognised organisation responsible for issuing the certificate and invite their presence on board.

2.6.4 In the case that an inspection is initiated based on a report or complaint, especially if it is from a crewmember, the source of the information should not be disclosed.

2.6.5 When exercising control, all possible efforts should be made to avoid a ship being unduly detained or delayed. It should be borne in mind that the main purpose of port state control is to prevent a ship proceeding to sea if it is unsafe or presents an unreasonable threat of harm to the marine environment. The PSCO should exercise professional judgement to determine whether to detain a ship until the deficiencies are corrected or to allow it to sail with certain deficiencies, having regard to the particular circumstance of the intended voyage.

2.6.6 It should be recognised that all equipment is subject to failure and spares or replacement parts may not be readily available. In such cases, undue delay should not be caused if, in the opinion of the PSCO, safe alternative arrangements have been made.

2.6.7 Where the grounds for detention are the result of accidental damage suffered on the ship's voyage to a port, no detention order should be issued provided that:

.1 due account has been given to the Convention requirements regarding notification to the flag State Administration, the nominated surveyor or the recognised organisation for issuing the relevant certificate;

.2 prior to entering a port, the master or company has submitted to the port state authority details on the circumstances of the accident and the damage suffered and information about the required notification of the flag State Administration;

.3 appropriate remedial action, to the satisfaction of the port State authority, is being taken by the ship; and

.4 the port State authority has ensured, having been notified of the completion of the remedial action, that deficiencies that were clearly hazardous to safety, health or environment have been rectified.

2.6.8 Since detention of a ship is a serious matter involving many issues, it may be in the best interest of the PSCO to act with other interested parties. For example, the officer may request the owner's representatives to provide proposals for correcting the situation. The PSCO may also consider co-operating with the flag State Administration's representatives or recognised organisation responsible for issuing the relevant certificates, and consulting them regarding their acceptance of the owner's proposals and their possible additional requirements. Without limiting the PSCOs discretion in any way, the involvement of other parties could result in a safer ship, avoid subsequent arguments relating to the circumstances of the detention, and prove advantageous in the case of litigation involving "undue delay".

2.6.9 Where deficiencies cannot be remedied at the port of inspection, the PSCO may allow the ship to proceed to another port, subject to any appropriate conditions determined. In such circumstances, the PSCO should ensure that the competent authority of the next port of call and the flag State are notified.

2.6.10 Detention reports to the flag state should be in sufficient detail for an assessment to be made of the severity of the deficiencies giving rise to the detention

2.6.11 The company or its representative has a right of appeal against a detention taken by the Authority of a port State. The appeal should not cause the detention to be suspended. The PSCO should properly inform the master of the right of appeal.

2.6.12 To ensure consistent enforcement of port state control requirements, PSCOs should carry an extract of 2.6 (General Procedural Guidelines for PSCOs) for ready reference when carrying out any port state control inspections.

[Extract from IMO resolution A.787(19), as amended]

Table 9 Details of the certificates and documents to be carried

Applicable to ALL ships:

1	**Certificate of Registry**	☐
2	**Tonnage Certificate** Issued to every ship above 24 metres in length and 150 GT, the gross tonnage (GT) and net tonnage (NT) of which has been determined in accordance with the convention. It should be noted that the GT of a ship may for certain ships, be determined in accordance with national rules. A statement to that effect should be included on the certificate, and as a footnote in the relevant SOLAS, STCW and MARPOL certificates held by the ship [Tonnage Measurement Convention 1969, art. 7]	☐
3	**International Load Line Certificate** Issued to every ship above 24 metres in length and/or 150 GT, which has been surveyed and marked in accordance with the Convention. The certificate is valid for five years. A booklet "Particulars of Conditions of Assignment" is issued with the certificate, detailing the conditions under which the freeboard is assigned. It forms an integral part of the certificate. There is also an **International Load Line Exemption Certificate** that is issued to a ship granted an exemption under the Load Line Convention provisions [Load Line (LL) Convention 1966, art. 16 / LL Protocol 1988, art. 18]	☐
4	**Intact Stability Booklet** Issued to every passenger ship regardless of size and all cargo ships above 24 metres. The master must be supplied with a **Stability Booklet** containing such information as is necessary to enable him, by rapid and simple processes, to obtain accurate guidance as to the stability of the ship under varying conditions of service [SOLAS 1974, reg. II-1/22 & II-1/25-8 / LL Protocol 1988, reg. 10]	☐
5	**Cargo Securing Manual** All cargoes *(other than solid and liquid bulk cargoes)* should be loaded, stowed and secured in accordance with the Manual. All types of ships engaged in the carriage of all cargoes other than solid and liquid bulk cargoes should therefore carry the Manual. It may not therefore be carried. [SOLAS 1974, reg. VI/5, VII/6 & MSC/Circ.745]	☐
6	**International Oil Pollution Prevention Certificate (IOPP)** Issued to all dry cargo ships over 400 GT which are engaged on voyages to ports under the jurisdiction of other Parties to MARPOL 73/78. The IOPP certificate is valid for five years. The certificate is supplemented by a **Record of Construction and Equipment for Ships other than Oil Tankers (Form A)** [MARPOL 73/78, Annex I, reg. 4]	☐
7	**Oil Record Book** **Oil Record Book, Part I (Machinery space operations)** - For every dry cargo ship over 400 GT other than an oil tanker [MARPOL 73/78, Annex I, reg. 20]	☐
8	**Shipboard Oil Pollution Emergency Plan (SOPEP)** Required to be carried on every dry cargo ship over 400 GT and be approved by the flag State [MARPOL 73/78, Annex I, reg. 26]	☐
9	**Garbage Management Plan** Annex V deals with regulations for the prevention of pollution by garbage from ships. Issued to all dry cargo ships above 400 GT. The Plan must be in accordance with the IMO Guidelines and written in the working language of the crew. Each ship with a Plan must also keep a **Garbage Record Book**. Placards notifying the crew of disposal requirements need to be displayed [MARPOL 73/78, Annex V, reg. 9]	☐
10	**International Sewage Pollution Prevention Certificate** Annex IV deals with regulations for the prevention of pollution by sewage from ships. Issued to MARPOL ships above 200 GT and those certified to carry more than 10 persons, **IF** the flag state has implemented MARPOL Annex IV in advance of its entry into force. It may not therefore be carried. [MARPOL, Annex IV, reg. 4]	☐

11 **Minimum Safe Manning Certificate**

Issued to all ships. Valid until amended. [SOLAS 1974 (1989 amendments), reg. V/13b]

12 **Certificates for masters, officers or ratings**

Certificates of Competency - Seafarers must carry appropriate original national certificates of competence endorsed by the State that issued the certificate attesting that it meets international STCW standards. **Flag State Recognition Endorsements** - For those seafarers serving on ships of a flag that is different to that of the State that issued the certificate of competency, a flag State recognition endorsement should be carried by the seafarer. The recognition endorsement must be obtained within 3 months of a seafarer joining a ship. Documentary evidence that the recognition endorsement has been applied for by the seafarer should be carried. **Ship Type Endorsements** - Certificates must be fully endorsed for service on particular types of ships, in particular passenger ships and tankers. There is a transitional period that will last until February 2002 for converting from STCW 1978 to STCW 1995, notably in respect of Flag State Recognition Endorsements [STCW 1995, art. VI, reg. I/2 / STCW Code, section A-I/2]

13 **Certificates of medical fitness**

A medical fitness certificate to be issued at least once every 2 years, although equivalent arrangements may apply in some States. Medical information and records of vaccination and revaccination should be carried [ILO Convention No. 73]

14 **Document of Compliance (DOC) & Safety Management Certificate (SMC)**

Required under the ISM Code for all ships above 500 GT. Issued to the Company following an initial verification of compliance with the ISM Code provision. Valid for five years [SOLAS 1974, reg. IX/4]

15 **Radio Station Licence**

Issued to the shipowner and valid for four years. It is the shipowner that is licensed to operate the ship's radio station [ITU Regulations]

16 **Fire control plan and Muster list**

All ships must carry and permanently display general arrangement plans showing fire control stations, fire sections, extinguishing arrangements / appliances etc. This information may be provided in the form of a booklet, one copy to each officer. An additional set of plans should be permanently stored outside of the deckhouse for shore side firefighting personnel. All ships must carry and display in conspicuous places throughout the ship up to date muster lists, including on the bridge, and in the engine room and crew accommodation spaces [SOLAS 1974, reg. II-2/20, III/8]

17 **Damage control booklets**

There shall be permanently exhibited, plans clearly showing the boundaries of the watertight compartments for each deck and hold, the openings therein with the means of closure and position of any controls thereof, and the arrangements for the correction of any list due to flooding. Booklets containing the aforementioned information shall be made available to the officers of the ship [SOLAS 1974, reg. II-1/25, 6, 7 & 8]

18 **Ship's Logbook**

Every ship must keep records of tests and drills, and records of inspection / maintenance of lifesaving appliances and equipment, and such records are likely to be checked by the PSCO [SOLAS 1974, reg. III/19.5]

19 **Classification Certificate (Hull) and (Machinery)**

Issued to ships by a classification society and should be carried as long as the ship remains in class

20 **Port state control reports**

Additional certificates to be carried by dry bulk cargo ships:

21 **Cargo Ship Safety Construction Certificate *** ☐

Issued after survey of a cargo ship of over 500 GT that satisfies the requirements for cargo ships, set out in SOLAS regulation I/10, and complies with the applicable requirements of chapters II-1 and II-2, other than those relating to fire extinguishing appliances and fire control plans. The certificate is issued by the flag state and is valid for five years [SOLAS 1974, reg. I/12 / SOLAS Protocol 1988, reg. I/12]

22 **Cargo Ship Safety Equipment Certificate *** ☐

Issued after survey of a cargo ship of over 500 GT that complies with the relevant requirements of chapters II-1, II-2 and III and any other relevant requirements of SOLAS. A Record of Equipment (Form E) supplements the Certificate and should be permanently attached. Issued by the flag state and is valid for two years [SOLAS 1974, reg. I/12 / SOLAS Protocol 1988, reg. I/12]

23 **Cargo Ship Safety Radio Certificate *** ☐

Issued after survey of a cargo ship of over 300 GT fitted with a radio installation. Issued by an organisation approved by the flag State and valid for one year. A Record of Equipment (Form R) supplements the Certificate and should be permanently attached [SOLAS 1974, reg. I/12]

* A certificate called a **Cargo Ship Safety Certificate** may be issued after survey to a cargo ship which complies with the relevant requirements of chapters II-1, II-2, III, IV & V, as an alternative to the above individual cargo ship safety certificates [SOLAS Protocol 1988, reg. I/12]

24 **Exemption Certificate** ☐

For ships granted an exemption under the SOLAS provisions and issued in addition to the Cargo Ship Safety Certificates [SOLAS 1974, reg. I/12]

25 **Bulk carrier booklet** ☐

Applies to all ships carrying bulk cargoes other than grain, although for ships below 500 GT, the flag State may allow alternative measures. The booklet shall include information on stability, ballasting rates / capacities, maximum tank top loadings, loading instructions etc [SOLAS 1974, reg. VI/7]

26 **Document of Compliance with the Special Requirements for Ships Carrying Dangerous Goods** ☐

The document is evidence of compliance with the construction and equipment requirements of the Regulation. Issued by the flag State. The period of validity should not exceed 5 years and should not be extended beyond the expiry date of the Cargo Ship Safety Construction Certificate held on board [SOLAS 1974, reg. II-2/54.3]

27 **Dangerous Goods Manifest or Stowage Plan** ☐

This is a requirement for ships carrying dangerous goods. It is a special list or manifest that sets out, in accordance with the classification in SOLAS reg. VII/2, the dangerous goods on board and their location. A detailed stowage plan which identifies by class and sets out the location of all dangerous goods on board may be used in place of such special list or manifest. A copy of one of these documents shall be made available before departure to the person/organisation designated by the port State authorities [SOLAS 1974, reg. VII/5 & MARPOL 73/78, Annex III, reg.4]

28 **Document of Authorisation for the Carriage of Grain** ☐

Certifies that a ship loaded with grain complies with the regulations of the International Code for the Safe Carriage of Grain in Bulk. The document shall accompany or be incorporated into the Grain loading manual and include information on stability information [SOLAS 1974, reg. VI/9]

29 **Survey report file** ☐

Every bulk carrier of more than 150 metres in length must have a complete survey report file consisting of: reports of structural surveys; condition evaluation report; thickness measurements reports; and survey planning document and supporting documents: main structural plans of holds and ballast tanks; previous repair history; cargo and ballast history; and inspections by ship's personnel [SOLAS 1974 reg. XI/2]

Table 10 The initial inspection

First impressions (on boarding):

External condition of the: ☐
- hull
- freeboard marks
- accommodation ladder
- mooring arrangements

Certificate check (in the master's cabin):

As regards the general status of certificates / documentation - verify: ☐
- missing or expired
- not translated or posted up, as required
- discrepancies
- outdated or unsigned endorsements
- uncertified copies of original certificates
- inconsistencies or omissions in record books
- certificates issued by non-recognised organisations

As regards safe manning – verify: ☐
- compliant manning levels
- minimum rest periods applied

As regard crew certification – verify: ☐
- presence of original and valid certificates
- English translation
- medical certificates
- minimum age requirement complied with

As regards the ISM code – check: ☐
- crewmembers are familiar with the Company 'Safety and environmental protection policy'
- the 'Safety management system' documentation is readily available
- status of interim certificates
- the ship type is covered in the DOC

"Walk around" (to check on the overall condition of the ship):

PSCO would be likely to verify the general condition of:

Exposed decks: ☐
- deck plating
- bulwark and stays
- guard rail
- hatch coamings and covers
- piping and vents
- presence of improper temporary repairs
- presence of recent welding / hot work
- presence of liquid seepage's

Cargo handling gear: ☐
- cargo gear and additional equipment
- cargo securing devices

Navigation and radiocommunication equipment: ☐
- navigational equipment
- management of voyage charts / publications
- hand-over procedures for watch and control of ship
- bridge visibility
- record of steering gear tests / drills
- radio installation and equipment
- reserve radio batteries
- record of operation and maintenance
- fire detection and alarm systems

Lifesaving appliances (LSA): ☐

- Lifeboats, rescue boats and liferafts
- launching arrangements
- personal lifesaving appliances
- record of periodic inspections and testing / drills
- management of emergency plans and instructions
- consistency of mustering practice with that in the Plan

Fire fighting arrangements (FFA): ☐

- fire doors
- means of escape
- fire pumps
- fire main, hydrants and hoses
- fire extinguishers
- record of periodic inspections and testing / drills
- management of fire control plan and instructions

Machinery spaces: ☐

- main and auxiliary engines
- piping, pumps and valves
- electrical generators
- cables, terminations and joint arrangements
- lighting
- cleanliness of spaces
- emergency escape routes

Pollution prevention arrangements: ☐

- oily-water separator and associated equipment
- SOPEP
- garbage arrangements

Living and working conditions: ☐

- condition and sufficiency of food and potable water supply
- arrangements and cleanliness of food stores, galley, pantries, refrigerated chambers and mess rooms
- sanitary arrangements, including condition of doors, flooring and drainage
- operation and maintenance of ventilation, lighting, heating and water supply
- medical facilities, including medicines and equipment
- record of accommodation inspections
- availability of personal protective equipment

Table 11 Examples of clear grounds

1	Evidence of inaccuracies in the certificates and other documentation during their examination, including evidence that the oil record book has not been properly kept and absent or inaccurate ISM Code certification, where appropriate	☐
2	Indications that crewmembers are not able to communicate adequately with each other	☐
3	Evidence of shipboard operations, such as cargo work, are not being conducted safely and in accordance with IMO guidelines	☐
4	Absence of an up-to-date muster list, fire control plan and a damage control plan, and evidence that crewmembers are not aware of their fire fighting and abandon ship duties	☐
5	The absence of, or serious deficiencies in, the principal safety and pollution prevention equipment or arrangements required by conventions	☐
6	Excessively unsanitary conditions on board the ship	☐
7	Evidence that serious hull or structural deterioration or deficiencies exist that may place at risk the structural, watertight or weathertight integrity of the ship. The absence on board of the survey report file, where appropriate, or the failure to keep the file up to date may also constitute clear grounds	☐
8	Evidence that the master or crew is not familiar with essential shipboard operations relating to the safety of the ship or the prevention of pollution, or that such operations have not been carried out	☐
9	Evidence that the ship's log books, manual etc are not properly, or are falsely maintained	☐

Section 4

DEFICIENCIES AND THE DETENTION OF SHIPS

Deficiencies

A deficiency exists when a condition is found on a ship that is not in compliance with the requirements of a convention. When deficiencies are found the nature of the deficiency and the corresponding action to be taken by the ship is recorded on the "Report Form B". The number and nature of the deficiencies found by the PSCO determine the corrective action that the ship needs to take and whether or not the ship is to be detained.

It is important that the master fully understands what the deficiencies are, and the rectification measures that the ship needs to take. This is particularly important when the deficiencies are sufficient to lead to a detention order being placed on the ship. Indeed, at this point in time, the master should also be informed of the ship's right of appeal against the order. Any misunderstandings could unnecessarily delay the ship in port. The master must check that the deficiency details entered on Form B are correct, and seek clarification from the PSCO, where necessary.

Where the deficiencies relate to a statutory survey item, the master is advised to call in a classification surveyor because the classification society is authorised to deal with such items on behalf of the flag State.

Corrective actions within a specified time period

There are three basic options available to the PSCO to take:

1. Require the rectification of deficiencies before the ship sails – the PSCO may decide to return to the ship to check that the deficiencies have been correctly rectified;

2. Permit the ship to sail on condition that the deficiencies are rectified at the next port – he would then inform the next port of his decision; or

3. Require deficiencies to be rectified within 14 days, or in the case of ISM non-conformity, within 3 months. The PSCO is then likely to report the deficiencies as being 'outstanding' and, until the endorsement is lifted, the ship can expect to be targeted for inspection at subsequent ports.

Permit to sail

When a deficiency needs to be rectified but where proper repair facilities or docks are not available at the port of inspection, the ship may be allowed to sail to the nearest appropriate repair port. In assessing whether or not a ship is safe to proceed to sea and onto a repair port, the PSCO would consider:

- the length and nature of the intended voyage;
- the size and type of ship;
- the nature of the cargo being carried; and
- whether or not the crew were sufficiently rested.

It is essential that the ship reach the repair port, as instructed. Failure to do so might result in a banning order being placed on the ship by the port State.

Suspension of ship operations

If the deficiencies found make cargo operations unsafe or threaten the marine environment, the PSCO might suspend ship operations, such as cargo work or bunkering. The following deficiencies might lead to a suspension:

- incomplete oil transfer procedures when bunkering;
- incomplete SOPEP arrangements;
- incomplete information on the cargo; or
- a non-compliant cargo loading plan.

Detention Orders

A ship is detained where a PSCO decides that it is unsafe to proceed to sea or because the deficiencies are so serious that they need to be rectified before the ship sails. When deficiencies pose no reasonable threat to the environment and do not

seriously affect the safety of the ship or its crew, the ship should not be detained. Refer to *Table 13* for examples of detainable deficiencies.

A detention order can be placed even though the deficiencies could be rectified before the scheduled sailing of the ship. A detention order might include an instruction that the ship had to remain in a particular place, or move to an anchorage or another berth. The order would specify the circumstances that would allow the ship to be released from detention. The absence of valid ISM certification might also lead to a ship being detained.

In coming to a decision on detention, particularly when it relates to structural rather than operational deficiencies, the PSCO should consider the seaworthiness of the ship and not its age and make due allowance for fair wear and tear. If there are questions about diminution rates of the main structural members, the PSCO would be expected to contact the flag State / classification society. Damage temporarily but effectively repaired for a voyage to a port for permanent repairs should not constitute grounds for detention. Problems with the crew's accommodation and living conditions, however, would be treated more seriously.

The port State is obliged to notify the flag State of any detention. The flag State, or a classification society acting on its behalf, may attend the ship to help resolve the problem. In this case, the PSCO might agree to the remedial action proposed by the surveyor and allow him to oversee the repairs. Whatever the arrangement the authorisation of the repair and cost are for the master / shipowner.

When a ship is detained all costs accrued by the port State to re-inspect the ship would be charged to the ship, and detention orders would not be lifted until the port state has received payment in full.

Detained ships are widely publicised by port State regions and multiple detentions could severely impact on a ship's ability to trade without restraint.

The right of appeal against a detention order or any undue delays

In the first instance the master should directly query any detention order with the PSCO before he leaves the ship, should the master feel that the detention order was unfair. If that fails, the master could make an informal appeal to senior officials within the port State control Administration. If that fails, the ship has a formal right of appeal. The appeal should be made to the detaining port State authority as soon as possible and the flag State should also be informed of the action. The PSCO is required to inform the master of his right to appeal.

Arbitration proceedings would typically be conducted under the national laws of the port state, and laws that may require the serving of notice to proceed to arbitration within a very short period after the order has been placed. The serving of notice within 21 days, for example, is not uncommon. An appeal will normally not result in the detention order being automatically lifted.

Banning Orders

In general, if a ship leaves an inspection port with deficiencies and is ordered to proceed to a nominated repair port, and either fails to comply with any of the conditions imposed or fails to arrive at that port, a banning order will be imposed on that ship.

In the case, for example, of a ship being detained in the absence of valid ISM certification and the detention order being lifted to elevate port congestion, a banning order would then be automatically applied and remain in force until that ship could demonstrate full ISM compliance.

A banning order would typically apply to all ports within a port State region and would remain in force until the shipowner could prove that all deficiencies had been rectified. Force majeure or other overriding safety considerations might however necessitate a port State granting special permission for the ship to enter a specific port.

Where, in the exercise of port State control, a foreign ship is denied port entry, the master and the flag State should be provided with reasons for the denial of entry.

Table 12 Diagram showing what happens if deficiencies are found

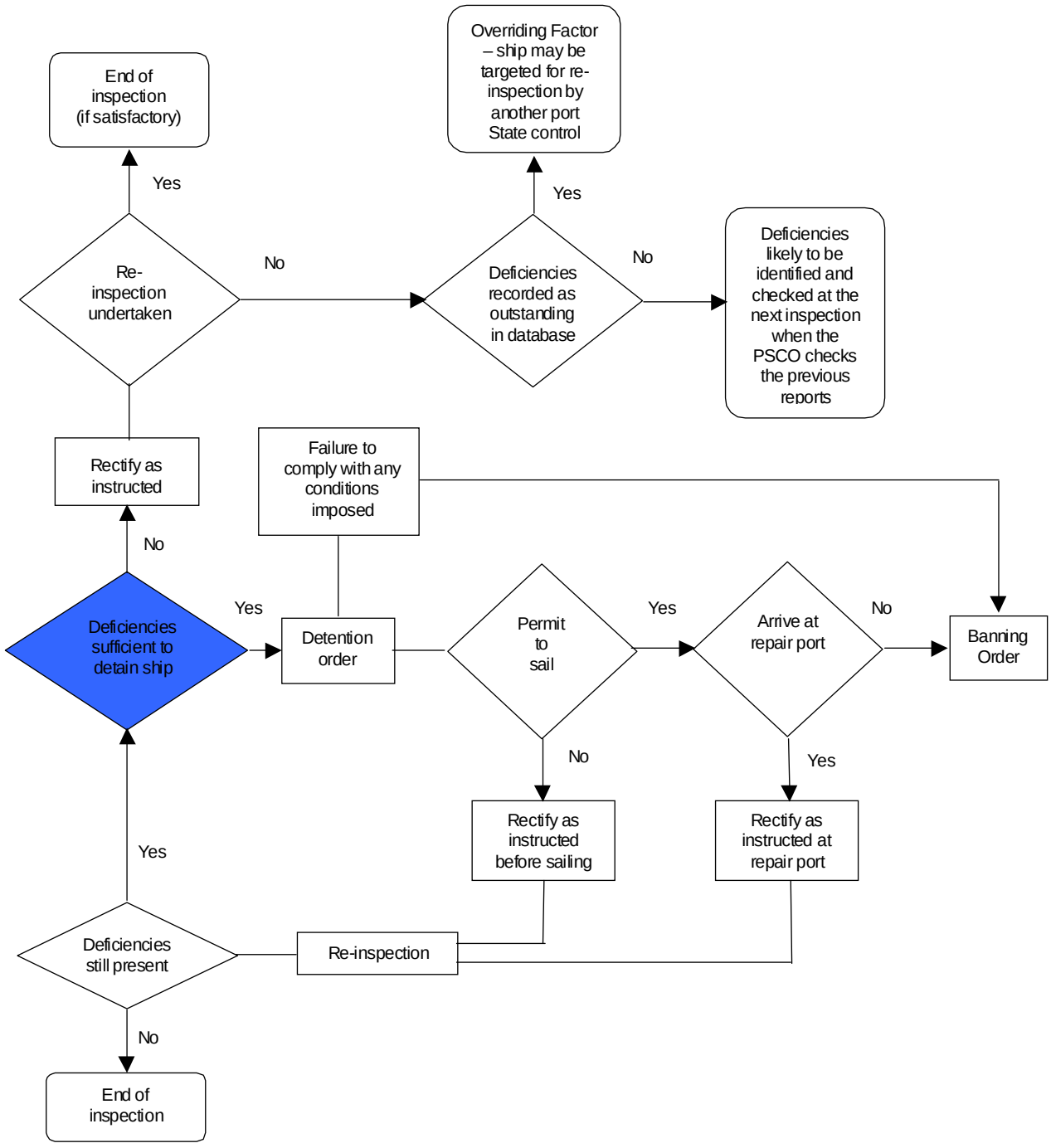


Table 13 Examples of detainable deficiencies

Under SOLAS: ☐

- failure of the main propulsion, electrical, pumping and steering systems
- poor cleanliness of engine room, excessive amounts of oily-water in the bilges, pipework insulation contaminated by oil
- absence, insufficient capacity or poor condition of LSA equipment
- absence, non-compliance or poor condition of FFA equipment, ventilation valves, fire dampers and quick closing devices
- absence, non-compliance or poor condition of navigation lights, shapes and sound signals
- absence or failure of mandatory navigation systems and equipment
- absence of corrected nautical charts and publications
- absence or failure of radiocommunication systems
- number, composition or certification of crew not corresponding to safe manning certificate
- serious deficiency of crew's operational competence (see checklists)

Under LOAD LINES: ☐

- significant areas of damage or corrosion, or pitting of plating and associated stiffening in decks and hull effecting seaworthiness, unless proper temporary repairs for a voyage to a port for permanent repairs have been carried out
- insufficient stability or ability to calculate stability conditions
- absence or poor condition of hull closing devices such as hatchcovers and watertight doors
- overloading
- absence or inability to read the draught marks

Under MARPOL (Annex I): ☐

- absence, poor condition or failure of oily-water filtering equipment, oil discharge monitoring and control systems and alarms
- remaining capacity of slop and/or sludge tank insufficient for intended voyage
- no oil record book

Under STCW: ☐

- lack of or insufficient crewmember certificates/endorsements
- inadequate navigational or engineering watch arrangements/personnel
- crewmember competency not adequate for the duties assigned for the safety of the ship and the prevention of pollution
- insufficient rested crewmembers for first watch and relieving watch duties at the commencement of the voyage

Under ILO Conventions: ☐

- insufficient food or potable water for next voyage
- excessively unsanitary conditions on board
- no heating in accommodation if ship operating in low temperature areas
- excessive garbage, blocked passageways

Section 5

CHECKLISTS

Mustering

1	Are crewmembers aware of their duties indicated in the muster list and aware of the location where to perform those duties?	☐
2	Are muster lists exhibited in conspicuous places throughout the ship, including on the bridge, in the engine room and in the crew accommodation space?	☐
3	Does the muster list show the duties assigned to different crewmembers?	☐
4	Does the muster list specify which officers are assigned to ensure that LSA and FFA equipment is maintained in good condition and available for immediate use?	☐
5	Does the muster list specify substitutes for key persons that might become disabled?	☐
6	Is the format of the muster list approved?	☐
7	Is the muster list up-to-date and in conformity with the crew list?	☐
8	Are the duties assigned to crewmembers manning the survival craft (boats or rafts) in accordance by SOLAS chapter III, part B?	☐
9	Are the persons placed in charge of each survival craft and their substitutes named?	☐
10	Are the operating instructions for the survival craft satisfactory?	☐

Communication

11	Are key persons able to communicate with each other?	☐
12	Which languages are the working languages used onboard?	☐
13	Are key persons able to understand each other during inspections or drills?	☐

14	Is the correct alarm used for summoning crewmembers to the muster station(s) and are crewmembers familiar with that alarm?	☐
15	During drills, are the survival craft correctly manned and operated by the assigned persons?	☐
16	Do crewmembers dress suitably for drills and know how to correctly don lifejackets?	☐
17	Is at least one lifeboat lowered after the necessary preparations, and launched with its assigned crew into the water at least once every 3 months?	☐
18	Can crewmembers start and operate the lifeboat engine(s) satisfactorily?	☐
19	Can crewmembers operate the davits (cranes) used for launching liferafts acceptably?	☐
20	Are crewmembers familiar with their assigned duties during abandon ship operations?	☐
21	Have crewmembers in charge of survival craft complete knowledge of the operation and equipment of the craft?	☐
22	Can two crewmembers undertake the preparations for embarking and launching survival craft be undertaken in less than 5 minutes?	☐
23	Does the performance of crewmembers on the drills suggest that the ship could be abandoned in 30 minutes?	☐
24	Is the condition of the survival craft, their contents (food, water etc) and launching arrangements (including davits, falls, winches and brakes) satisfactory?	☐
25	Is the condition of the side lighting, emergency communication means, operating instructions (posters / signs) and embarkation ladder arrangements satisfactory?	☐
26	Are the liferafts correctly serviced, stowed and connected to the ship by hydrostatic releases?	☐
27	Is the number and stowage of lifejackets (including immersion suits and thermal protective aids, where appropriate) correct, and the number, condition and validity of life-buoys, rockets, smoke signals and SARTs?	☐

Fire Drills and FFA Equipment

28	Do the crewmembers know how to activate the fire alarm?	☐
29	Do the crewmembers understand the procedure for reporting a fire, once detected, to the bridge and/or damage control centre?	☐
30	When the crew alarm is sounded, do the fire fighting parties promptly muster at their stations?	☐
31	During the course of fighting a simulated fire, do the fire fighting parties correctly bring into action, don and effectively use all the appropriate equipment?	☐
32	Do the fire fighting team leaders give effective orders and report adequately to the bridge and/or damage control centre?	☐
33	Do the medical teams correctly take care of injured persons and handle the stretchers in an acceptable manner through narrow passageways, doors and stairways?	☐
34	Do the appropriate crewmembers known how to operate the emergency generator, CO2 room, sprinkler and emergency fire pumps correctly?	☐
35	Do the appropriate crewmembers understand the operation of manually-operated fire doors, watertight doors and fire dampers?	☐
36	Do the following function correctly: ▪ fire doors, including their remote operation if appropriate ▪ fire dampers and smoke flaps ▪ quick-closing remotely operated valves ▪ emergency stops of fans and fuel oil pumps ▪ fire detection and fire alarm system ▪ fixed systems in engine room and cargo spaces (servicing dates) ▪ main and emergency fire pumps	☐
37	Do the fire fighting appliances comply with the fire control plan?	☐

Damage and Fire Control Plans

38	Are the damage and fire control plans (or booklets) provided?	☐
39	Are the crewmembers familiar with their duties according to, and information given on the control plans?	☐
40	Can key persons explain the actions to be taken in various damage conditions?	☐
41	Are key persons knowledgeable in respect of watertight bulkheads and the openings therein , the means of closing and the positions of any controls?	☐
42	Can key persons explain arrangements for the correction of any list due to flooding?	☐
43	Can key persons explain the effect of trim and stability in case of damage to and the consequential flooding of a compartment and the countermeasures to be taken?	☐

44	Are the fire control plans permanently exhibited, up-to-date, and is one copy readily available in an accessible position?	☐
45	Are key persons familiar with the principal structural members forming part of the various fire sections and the means of access to the different compartments?	☐

Manuals and Instructions

46	Do key crewmembers understand manuals, instructions etc. relevant to the safe condition and operation of the ship and its equipment?	☐
47	Is the following information provided in a language understood by the crew and are the crewmembers aware of the contents and able to respond accordingly to:	
	▪ instructions concerning the maintenance and operation of FFA equipment and installations?	☐
	▪ instructions to be followed in the event of an emergency?	☐
	▪ posters and signs illustrating the purpose of controls and the procedures for operating survival craft launching controls?	☐
	▪ instructions for on board maintenance of LSA equipment?	☐
	▪ training manuals containing instructions and information on the LSA equipment provided?	☐
	▪ the shipboard oil pollution emergency plan (SOPEP)?	☐
	▪ the stability booklet, associated plans and information contained therein?	☐
48	Are key crewmembers aware of the requirements for maintenance, periodic testing, training, drills and logbook entries?	☐

ISM Code

49	Is there a Company safety and environmental protection policy and are key personnel familiar with it?	☐
50	Is the safety management documentation and manual readily available onboard?	☐
51	Is the relevant documentation on the safety management system (SMS) in a working language or a language understood by crewmembers?	☐
52	Can key personnel identify the company responsible for the operation of the ship and does this correspond with the Company named on the ISM certificates?	☐
53	Can key personnel identify the “designated person”?	☐
54	Are procedures in place for establishing and maintaining contact with shore management in an emergency?	☐
55	Are there programmes available onboard for drills and exercises to prepare crewmembers for emergency actions?	☐
56	Is documentation available to show how new crewmembers have been made familiar with their duties?	☐

57	Can the Master provide documented proof of his responsibilities and authority, and allow for, and sit comfortably with, his overriding authority?	☐
58	Have non-conformities been reported to the Company and has corrective action been taken by the Company?	☐
59	Does the ship have a maintenance routine and are records available?	☐

Bridge and Radio Operations and Equipment

60	Is the OOW familiar with the bridge control and navigational equipment, changing the steering mode from automatic to manual and the ship's manoeuvring characteristics?	☐
61	Does the OOW have knowledge of the location and operation of all safety and navigational equipment, including fire detection and alarm panels?	☐
62	Is the OOW familiar with collision avoidance procedures, the COLREGS, the radar, ARPA controls and capable of obtaining acceptable radar picture?	☐
63	Is the OOW familiar with the procedures applying to the navigation of the ship in all circumstances, including: ▪ management of nautical charts and nautical publications ▪ bridge procedures, instructions and manuals ▪ voyage planning ▪ periodic tests and checks of equipment ▪ compass error checks ▪ preparations for arrival and departure ▪ signalling ▪ communications ▪ emergencies ▪ logbook entries	☐
64	Is the GMDSS radio operator(s) able to use all components of the radio arrangement including its test functions?	☐
65	Is the GMDSS operator(s) able to explain the correct procedures for cancelling a false distress alert?	☐
66	Is the GMDSS equipment compliant for the sea areas the ship is trading, and if an Exemption certificate is issued, does the ship comply with the special requirements imposed by the exemption?	☐
67	Does the ship receive Navtex MSI messages?	☐
68	Are the following satisfactory: ▪ EPIRB installation ▪ Radar transponder installation ▪ Antenna condition ▪ Radio batteries	☐

Cargo Operations

69	Are personnel assigned with specific duties related to the cargo and any cargo handling equipment familiar with those duties?	☐
70	Are such personnel familiar with any dangers posed by the cargo or cargo operations?	☐
71	Are the oxygen analysers and other personal protection devices used during cargo operations in good working order?	☐
72	Are Ship / Shore Safety Checklists used?	☐
73	Are bending stresses with maximum limits calculated?	☐
74	Are cargo / ballasting operations carried out in accordance with the Loading / Discharging Plan and cargo stowage conditions being observed?	☐
75	Are the responsible crewmembers familiar with the Cargo Securing Manual and other Codes of Practice, where relevant?	☐
76	If the Bulk Carrier Booklet has been endorsed with any restrictions on the cargoes that can be carried, are those restrictions being observed?	☐

Operation of Machinery

77	Are key engineering personnel familiar with their duties related to the operation of essential machinery, such as: ▪ Emergency and stand-by sources of electrical power ▪ Auxiliary steering gear ▪ Bilge and fire pumps ▪ any other equipment essential in emergency situations	☐
78	Are such personnel familiar with: ▪ the emergency generators ▪ actions necessary before the main engine can be started ▪ different possibilities of starting the main engine in combination with the source of starting energy ▪ procedures when the first attempt to start the main engine fails	☐
79	Are such personnel familiar with: ▪ the stand-by generator engine ▪ possibilities of starting the stand-by engine automatically and/or by hand ▪ blackout procedures ▪ load sharing system	☐
80	Are such personnel familiar with: ▪ which type of auxiliary steering gear system applies to the ship ▪ how it is indicated which steering gear unit is in operation ▪ what action is needed to bring the auxiliary steering gear into operation	☐

81 Are such personnel familiar with: ☐
- bilge pumps
- number and location of bilge pumps, including emergency bilge pumps
- starting procedures for all these bilge pumps
- appropriate valves to operate
- most likely causes of failure of bilge pump operation and the possible remedies
- fire pumps
- number and location of fire pumps, including emergency fire pump
- starting procedures for all fire pumps and appropriate valves to open?

82 Are such personnel familiar with the starting and maintenance of lifeboat / rescue boat engines? ☐

83 Are such personnel familiar with the local control procedures for those systems which are normally controlled from the bridge? ☐

84 Are such personnel familiar with the maintenance procedure for batteries? ☐

85 Are such personnel familiar with emergency stops, dampers, fire detection and alarm systems, the operation of watertight and fire doors? ☐

86 Are such personnel familiar with the change of control from automatic to manual for cooling water and lube oil systems for the main and auxiliary engines? ☐

Bunkering Operations

87 Are bunkering transfer procedures posted, available and understood by all relevant personnel? ☐

88 Are an appropriate number of personnel on duty for bunkering? ☐

89 Are there means of communication between ship's bunkering personnel and between ship and ashore / barge? ☐

90 Are there procedures to report and deal with oil discharges? ☐

Control of Oily Mixtures from Machinery Spaces

91 Have all the operational requirements of MARPOL Annex I been met, taking into account: ☐
- the quantity of oil residues generated
- the capacity of sludge and bilge water holding tanks
- the capacity of the oily water separator?

92 Have all the correct entries been made in the Oil Record Book? ☐

93 Has the correct use been made of reception facilities, and have any alleged inadequate facilities been noted and reported by the Master to the flag State? ☐

94 Are the responsible personnel familiar with the procedures for handling sludge and bilge water? ☐

Control of Garbage

95	Have all the operational requirements of MARPOL Annex V and national legislation been met?	☐
96	Has the correct use been made of reception facilities, and have any alleged inadequate facilities been noted and reported by the Master to the flag State?	☐
97	Are all ship's personnel familiar with the principle of minimising the amount of potential garbage and the shipboard procedures for handling and storing garbage as contained in the Garbage Management Plan?	☐
98	Are ship's personnel familiar with the disposal and discharge requirements under MARPOL Annex V inside and outside a special area?	☐
99	Are they aware of the areas determined as special areas?	☐

INSPECTION REPORTING FORM

INTERCARGO has developed this form for ships to report their experiences of port State control inspections where the performance / practice of the Port State Control Officer (PSCO) has caused concern to the ship. Confidentiality is assured, unless INTERCARGO is requested to investigate.

GENERAL DETAILS **(as recorded on "Report Form A" by the PSCO)**

1 Reporting authority of .....
11 Place of inspection .....
10 Date of final report .....

2 Name of ship .....
6 IMO number .....
7 Gross tonnage .....

INSPECTION PRACTICE / PERFORMANCE

Interval between inspections:

- Less than six months since last "clean" inspection (no recorded deficiencies) ❑

Timing of the inspection during scheduled port stay:

- Did the PSCO attend the ship at an unreasonable / unnecessarily inconvenient time? i.e. within hours of the ship's scheduled departure time ❑

Charging policy imposed:

- Excessive level of charges ❑
- Unfair application of charges ❑

Unreasonable attitude of the PSCO:

- The PSCO proceeded with a "more detailed inspection" despite the lack of clear grounds ❑
- The PSCO required corrective actions not called for by class or convention regulation ❑
- The PSCO imposed undue demands on the routine operation of the ship ❑
- The actions of the PSCO unnecessarily delayed the ship ❑

Identification of deficiencies:

- The PSCO showed poor professional judgement ❑
- The PSCO exaggerated the severity of the deficiencies ❑
- The nature of the deficiencies identified and the corrective actions needed to clear the deficiencies were not clearly explained ❑

Detention order:

- The opportunity to consult owner, class or flag State was not provided ❑
- The detention was unfair / unreasonable ❑
- The PSCO gave no information on the right to appeal his decision ❑

REASONS **(please give experiences not listed, or expand on any of the points raised above)**

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Master: ..... **Company:** .....

RETURN FORM TO

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