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5th August 2011

To: Ship owners / Managers

Dear Sirs/Madams,

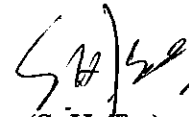
Concentrated Inspection Campaign
on
Structural Safety and the International Convention on Load Lines
(1st September to 30th November 2011)

The Paris MOU and Tokyo MOU will jointly conduct a Concentrated Inspection Campaign (CIC) on Structural Safety and the International Convention on Load Lines in the period from 1st September to 30th November 2011. The Vina del Mar Agreement, the Indian Ocean MOU, the Mediterranean MOU and the Black Sea MOU will follow the same routine during the Campaign.

2. The purpose of the Campaign on structural safety and load lines is to get a detailed view of the compliance of the relevant regulations.
3. The Campaign will focus on 17 areas with respect to Structural Safety and Load Lines, which are considered critical that any non-compliance detected by a PSCO may result in ship detention.
4. To facilitate masters of Hong Kong registered ships to prepare for this CIC exercise, relevant guidelines are attached for reference (see Annex I). Your particular attention is drawn to take the following actions before the campaign:
 - (a) management companies should distribute this circular letter and guidelines to their Hong Kong registered ships and make sure that all shipboard staff are fully aware of the Campaign;
 - (b) management companies and/or shipboard staff should carry out similar inspection to verify the compliance with the applicable requirements at all times, in particular prior to the commencement of the Campaign;
 - (c) management companies should ensure that masters and senior officers onboard ship could communicate effectively with PSCOs. Since poor communications with PSCOs during inspection may lead to the detention of your ships.

5. During the CIC, PSCOs will apply a questionnaire listing a number of items to cover the campaign. The questionnaire has been published on the website of Paris MOU and Tokyo MOU:
<http://www.parismou.org>
<http://www.tokyo-mou.org>
6. May I reiterate that maintaining a good PSC record for the Hong Kong registered ships is an on-going task for all of us. Therefore, we should work closely and in co-operation to achieve the target.
7. If you have any questions, please contact Senior Surveyor / Cargo Ships Safety Section at telephone number (852) 2852 4510, fax number (852) 2545 0556 or e-mail "ss_css@mardep.gov.hk".

Yours faithfully,



(S. H. Tse)

Senior Surveyor of Ships
Cargo Ships Safety Section
for Director of Marine

Encl.

Guideline for Preparation of the Concentrated Inspection Campaign On Structural Safety and the International Convention on Load Lines

Introduction

The Paris MOU and Tokyo MOU will jointly conduct the Concentrated Inspection Campaign (CIC) on Structural Safety and the International Convention on Load Lines from 1st September 2011 to 30th November 2011. The Vina del Mar Agreement, the Indian Ocean MOU, the Mediterranean MOU and the Black Sea MOU will follow the same routine during the campaign.

Purpose

The purpose of the Campaign on structural safety and load lines is to get a detailed view of the compliance of the relevant regulations.

Issues to be attended

The Campaign will focus on the following 17 areas with respect to Structural Safety and Load Lines, which are considered critical that any non-compliance detected by a PSCO may result in ship detention. Management companies and ship's masters should pay special attention to the following issues:

1) Before Physical Inspection

Q1 Is there a valid Load Line Certificate (incl. exemption) on board?

The valid Load Line Certificate shall be kept on board and

- surveys have been carried out in accordance with International Convention on Load Lines (ICLL) Art.14 and validity is in accordance with ICLL Art.19;
- if exemption certificate has been issued, the relevant conditions for granting the exemption as provided in ICLL Art.6 are complied with.

Lack of valid certificates as required may result in ship detention.

Q2 Is there a relevant valid Ship Safety Certificate (incl. exemption) on board?

The valid Ship Safety Certificate (e.g. Passenger Ship Safety Certificate, Cargo Ship Safety Construction Certificate, Cargo Ship Safety Certificate or Special Purpose Ship Safety Certificate) shall be kept on board and

- surveys including external of the ship's bottom as applicable shall be

recorded and endorsed in the Ship Safety Certificate;

- if exemption certificate has been issued, the relevant conditions for granting the exemption as provided in SOLAS I Reg.4 are complied with.

Lack of valid certificates as required may result in ship detention.

Q3 Is the specific documentation regarding structural requirements for various vessel types in accordance with relevant conventions?

Q3a For bulk carriers and Tankers – Enhanced Survey Program (ESP) data and Condition Evaluation Report

Under SOLAS XI-1 Reg. 2, bulk carriers and tankers shall be subject to an Enhanced Survey Program (ESP). The Survey Report File (SRF) and supporting documents in accordance with Res. A.744(18) shall be kept on board for the lifetime of the ship. The SRF includes:

- a) Report of Structural Surveys;
- b) Condition Evaluation Reports (Executive Hull Summary) - this document is an extract of the results from the last Special Survey/Class Renewal, endorsed by the Classification Society's head office or regional office on behalf of the Administration;
- c) Thickness Measurement Reports and Repair Reports including related major steel structure replacement;
- d) Survey Planning Document (or equivalent).

The following deficiencies may result in ship detention:

1. *Lack of valid documents as required; and*
2. *Failure to carry out the ESP in accordance with SOLAS XI Reg.2.*

Q3b For Oil Tankers (Category 2 and 3 of 15 years of age and over) – CAS Statement of Compliance

For tankers (Category 2 and 3 of 15 years of age and over) as per definition of MARPOL Annex I Reg. 1.5 and under Annex I Reg. 20, the valid Condition Assessment Scheme (CAS) Statement of Compliance must be kept on board as a supplement to the ship's International Oil Pollution Prevention Certificate, together with a copy of the CAS Final Report reviewed by the Administration.

Lack of valid documents as required may result in ship detention.

Q3c For ships built on or after 1st January 2007 a set of as-built construction drawings and plans showing any subsequent structural alterations

Under SOLAS II-1/3.7 a set of as-built construction drawings in accordance with circular MSC/Circ. 1135 and other plans showing any subsequent structural alterations shall be kept on board a ship constructed on or after 1st January 2007.

Lack of valid documents as required may result in ship detention.

Q3d Other relevant documentation or access to systems

- Valid Class Certificate – SOLAS II-1 Part A-1 Reg. 3-1 (refer to 2005 amendment adopted by Res. MSC.194(80)) requires ships to be designed, constructed and maintained in compliance with the structural, mechanical and electrical requirements of a classification society which is recognized by the Administration. For ships not covered by ESP or CAS, a valid Class Certificate should be adequate proof that thickness measurements were taken in accordance to the rules.
- Loading manual and stability information – ICLL Reg. 10
- Ship Structure Access Manual – Referring to SOLAS II-1 Reg. 3-6, oil tankers of 500 GT and over and bulk carrier of 20,000 GT and over, constructed on or 1st January 2006, an updated copy of Manual approved by the Administration shall be kept on board.
- Ship's Coating Technical File
 - Approved Paint Scheme (refer to SOLAS 2005 Amend II-1 Reg. 3-2) for oil tankers and bulk carriers constructed on or after 1st July 1998;
 - Ship's Coating Technical File in MSC.1/Circ.1330 – (refer to SOLAS 2006 Amend II-1 Reg. 3-2) for ships with a building contract on or after 1st July 2008; or the keel laid on or after 1st January 2009; or delivery on or after 1st July 2012, the effectiveness of the protective coating system shall be verified during the life of a ship by the Administration or RO in accordance with the File.
- Emergency Response Service - In accordance to MARPOL Annex I Reg. 37.4, all oil tankers of 5,000 tons deadweight or more shall have prompt access to computerized, shore-based damage stability and residual structural strength calculation programs. Evidence of compliance with this requirement (e.g. a contract) shall be kept on board.

Lack of valid certificates and documents as required may result in ship detention.

Q4 Have stability and strength data been found on board?

The original Stability Information Booklet (SIB) with classification's stamp and approved date shall be kept on board which shows Standard Loading Conditions that have been approved with reference to intact stability, damage stability (where applicable) and strength requirements. Damage stability information may also be included in a separate booklet, however the SIB is the primary document and covers both intact and damage stability (where applicable). SIB shall be written in a language familiar to the ships officer responsible for cargo operations.

The SIB will often include KG_{max} or GM_{min} limit curves that allow the master to

evaluate stability for a range of conditions, however these may be for intact stability only.

- For ship assigned timber freeboard, stability calculation for carrying timber on deck shall be included in SIB.
- Ships keels laid on or after 1st July 2010, as a minimum, comply with the requirements of part A of the Intact Stability Code (IS 2008). There are two significant changes: 1) SIB for all ships shall include wind and wave criteria; 2) The stability instruments approved by flag Administration or RO in cases where an instrument is provided to supplement the stability book.
- Vessel carrying grain, document of authorization for the carriage of grain or approved grain loading manual shall be kept on board.
- Damage stability calculation for ship types (A, B-60 and B-100) can be included in SIB or in approved Stability computer.

Lack of valid documents as required may result in ship detention.

2) After Physical Inspection

Q5a Is there a loading instrument on board?

The stability instrument shall be verified to be in working order during inspection if provided on board. PSCO may conduct a check to verify whether it is in working order, and correctly use by the responsible officer.

The master or responsible officer shall be able to perform stability computer calculations to ensure stability, bending moment and shear forces are maintained within maximum allowable limits. This is especially important in bulk carriers where high density cargoes are carried or the loading/ballasting arrangement is of a different configuration to that described in the vessel's loading manual.

- For ships keel laid after 1st July 2010, the stability instrument shall be approved by flag Administration or RO.

The loading instrument with shear force and bending moment calculation is required for bulk carriers with length of 150 m and upwards.

- Bulk carrier below 150m, constructed after 1st July 2006, the loading computer capable of providing information on the ship's stability in intact condition shall be fitted and must be approved by flag Administration or RO.

Absence of sufficient and reliable information, in an approved form, which enables the master to arrange for the loading and ballasting of his ship within a safe margin of stability, bending moment and shear force may result in ship detention.

Q5b Does it appear to be in working order?

The stability/loading instrument (i.e., instrument, or hardware and software) shall be verified to be in working order and in its correct use by the responsible officer if provided on board. The PSCO may conduct a random check to verify if the

instrument appears to be in working order, and its correct use by the responsible officer.

The loading stability/loading instrument not in working order may result in ship detention.

Q6 Does the protection of hatch openings and of other openings appear to be satisfactory?

- Conditions check for all around hatch openings and other openings;
- No cracks, excessive buckling or heavy corrosion should be observed;
- Corrosion, fractures or buckling are not considered acceptable in weathertight and watertight integrity. (packing, rubber, functioning, securing);
- Operation of cargo hatch cover, clearance for hatch cover cleat and the height of the sill of the openings as per ICLL.

The following deficiencies may result in ship detention:

1. *Absence, substantial deterioration or defective closing devices, hatch closing arrangements and water tight doors; and*
2. *Areas of significant damage or corrosion, or pitting of plating and associated stiffening in decks and hull affecting seaworthiness or strength, unless proper temporary repairs for a voyage to a port for permanent repairs have been carried out.*

Q7 Do the sea valves and overboard discharges, including their attachment to shell, appear to be satisfactory?

Sea valves and overboard discharges, including their attachment to shell shall be in good condition.

- Material, type, position of valves and fittings should be acceptable based on the record of the conditions of assignment of freeboard;
- External and operation inspection of the valves;
- Condition of hull and distance pieces around valves and open & close indicators check.

Absence, substantial deterioration or defective closing devices, hatch closing arrangements and watertight doors may result in ship detention.

Q8 Do the vessel's hull, bulkheads and deck, appear to be satisfactory?

Thickness measurements, if available, may be taken into account in deciding whether the corrosion represents significant structural deterioration (75 % and 100 % of the

allowable diminution for the structural member in question) affecting seaworthiness or strength.

Special attention should be given to the excessive corrosion of permanent seawater ballast tanks, top side tanks (bulk carriers), edges of openings, areas around draining openings and areas of stress concentrations.

Areas of significant damage or corrosion, or pitting of plating and associated stiffening in decks and hull affecting seaworthiness or strength, could lead to detention, unless proper temporary repairs for a voyage to a port for permanent repairs have been carried out.

Q9 Do the means of protection for crew and means of access appear to be satisfactory?

- Efficient bulwarks or guard rails (with stanchions, wires or chains and openings in between guard rails) on deck, machinery spaces, quarters and parts used for the work of the ship must be found in good condition. Special requirements for protection of the crew on vessels carrying timber deck are also to be considered if the vessel is assigned a timber freeboard.
- Safe access to tanker bows – For tankers including oil tankers as defined in SOLAS II-1 Reg. 2, chemical tankers as defined in SOLAS VII Reg. 8.2 and gas carriers as defined in SOLAS VII Reg. 11.2 – SOLAS II-1 Reg. 3-3.
- Approved Means of Embarkation/Dis-embarkation – For ships constructed on or after 1st January 2010.
- Ship Structure Access Manual for oil tankers and bulk carriers shall be kept on board.

Means of protection for crew and means of access not in satisfactory/operational condition may result in ship detention.

Q10 Do the freeing ports appear to be satisfactory?

The freeing port shall be free from obstructions and enable for rapidly freeing the water on main deck.

Means of freeing water from the deck not in satisfactory/operational condition may result in ship detention.

Q11 Do the freeboard marks or other marks appear to be in accordance with the Certificates?

The position of the load line mark (deck line, lines, mark of assigning authority) must be the same as those given in the ICLL Certificate, and permanent and in a contrasting color. Make sure the draught and/or freeboard Markings clearly painted in a distinctive

contrasting color, especially for the ship with ship-to-ship operation.

A solid equilateral triangle shall be marked 300mm below deck line for bulk carriers with any restrictions imposed on the carriage of solid bulk cargoes having a density of 1,780 kg/m³ and above.

Absence of or impossibility to read draught and/or freeboard marks may result in ship detention.

Q12 Has it been verified as far as possible that the vessel is not submerged or loaded beyond the limits allowed by the Certificates?

Special attention is to be paid on bulk-carriers loading/unloading heavy cargoes (density over 1,780 kg/m³) in alternate holds. The bending and shear stresses must be maintained within maximum allowable limits.

The applicable load line of the vessel on arrival at a port cannot be submerged beyond the limit allowed by the LL Certificates

Overloading of the ship may result in ship detention.

Q13 Do other items related with freeboard or the structural integrity of the ship appear to be satisfactory?

- Emergency Towing Arrangements required by SOLAS II-1 Reg. 3-4.1:
 - every tanker of not less than 20,000 tonnes deadweight shall comply with the requirement
- Emergency Towing Procedures (MSC.1/Circ.1255 for guidelines) required by SOLAS II-1 Reg. 3-4.2:
 - all passenger ship shall comply with the requirement not later than 1st January 2010
 - cargo ships constructed on or after 1st January 2010 shall comply with the requirement
 - cargo ships constructed before 1st January 2010, shall comply with the requirement not later than 1st January 2012
- Towing and Mooring Equipment (MSC/Circ.1175 on Guidance) required by SOLAS II-1 Reg. 3-8
 - Ships constructed on or after 1st January 2007, but does not apply to emergency towing arrangements provided under SOLAS II-1 Reg.3-4, shall comply with the requirement
- Special Requirement for Ships Carrying Timber required by ICLL Reg. 43 & 44

- An examination shall be made of the structural arrangements, fittings and appliances as related to timber load line assignments.

The following deficiencies may result in ship detention:

- 1. Absence, substantial deterioration or defective closing devices, hatch closing arrangements and water tight doors; and*
- 2. Absence of sufficient and reliable information, in an approved form, which enables the master to arrange for the loading and ballasting of his ship within a safe margin of stability, bending moment and shear force.*