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## MARINE DEPARTMENT

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To: Shipowners / Ship Managers and Classification Societies

Dear Sir/Madam,

## Updated Information for Port State Control Detentions of Hong Kong Registered Ships

Please be informed that there is a sudden surge and drastic increase in the number of detentions of Hong Kong registered ships by port States. We noticed that the detainable items raised by PSCOs were again standard items on the pre-arrival PSC inspection checklist prepared by Hong Kong Marine Department (HKMD) for use by all Hong Kong registered ships. We also noticed the latest detentions could be attributed to an ineffective Safety Management System on board.

The human element factor should not be underestimated in the detentions of Hong Kong registered ships, as noted by ship's crew in the failure to demonstrate the testing function of EPIRB to the PSCO, nobody intercepted the PSCO when he had boarded the ship for PSC inspection, failure to arrange a satisfactory entry into enclosed space drill, etc. The concerned and detained ships are all required to have an additional ISM or ISPS audits.

There are evidences that PSCOs were digging deeper into individual items, as noted by emergency fire pump failed to deliver the required pressure within the allowable time period, incinerators failed to reach the required temperature within the allowable time period, emergency generator failed to start up automatically, failed to connect to the emergency switchboard or failed to take on electrical loads, etc. Failure of these equipment often required temporary exemptions from HKMD.

We understand equipment on board are subject to failure and it is only through frequent or regular testing will failures be detected. If it happens at sea, cannot be repaired by ship's crew or no required spare parts on board, it is essential prior to arriving port, the defective equipment must be reported to the company, and most importantly to the port State (it can also be done via the local agent). There is no reason to hide any defects. It must be appropriately reported, and even though service agents or spare parts may not be available locally, but with supporting documentary evidences, HKMD will favourably consider temporary exemption for the ship.

HKMD will strive to assist our registered ships in the best possible way. We are planning PSC seminars for shipowners and ship management companies to exchange views on measures to avoid PSC detentions. Meanwhile, we have updated and enclosed the PSC inspection checklist with Chinese translation for use by the Hong Kong registered ships.

There is a need for HKMD to uphold the quality of our registered ships, to remain on the White List of all MoUs and in maintaining the US Coast Guard QUALSHIPS 21 status. We therefore ask for the cooperation of shipowners, ship management companies and crew on board to operate Hong Kong registered ships in a safe, environment friendly and secure manner.

Should you have any query, please do not hesitate to contact us.

Yours faithfully,

No signature on website copy

(P.K. Yeung)
Senior Surveyor/Cargo Ships Safety Section
for Director of Marine

Encl.