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MARINE DEPARTMENT

HARBOUR BUILDING

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4 November 2022

To : Shipowners, Ship Managers and Classification Societies

Dear Sir/ Madam,

QUALSHIP21 Status for 2023

In spite of the Marine Department (MD) circular letter issued on 29 September 2022¹ to draw attention to the significant increase in the number of detentions of Hong Kong registered ships (HK Ships) in the US waters and requested thorough checking of ships by duly completion of PSC Inspection (Pre-arrival) Checklist (Checklist) before entering ports in the US, we regret to inform you that there have been two more HK Ships being detained by the U.S. Coast Guard (USCG) in October 2022 within one week thus making a total of seven (7) vessels being detained in US ports in 2022. This represents an USCG PSC three-year rolling average detention ratio of 0.99% as at today² which has placed the Hong Kong Shipping Registry (HKSR) in a very vulnerable position of losing its QUALSHIP 21 status after 30 June 2023 if any further detention occurs in US ports on or before 31 December 2022.

2. To further enhance the quality of HK Ships and prevent HKSR from losing the QUALSHIP 21 status which is an honour to all HK Ships, MD will work together with all shipping companies to implement the following measures **with immediate effect:**

¹ <https://www.mardep.gov.hk/en/faq/pdf/let220929.pdf>

² A flag State is qualified for QUALSHIP 21 status when it's ships have attained **less than 1.0%** in the USCG PSC three-year rolling average detention ratio.

- Arrangement of Pre-arrival FSQC Audit (PAA):
 - Unlike the normal FSQC Audit, PAA is a mock PSC inspection of the port concerned. A PAA will be conducted following the similar pattern as a detailed PSC inspection and that the ship under the inspection will also be checked against the latest common deficiencies recorded in US ports.
 - MD will send an email to every HK-DOC company requesting the company to provide the itinerary of any HK ships calling US ports one month in advance. Based on the assessment of the ship information and recent performance, MD will identify if a HK ship should be subject to PAA which will be conducted by our appointed surveyor at available occasion before calling US port. It is worth noting that the cost of PAA will be borne by MD.
 - For ship that would likely be subject to a detailed inspection in US (e.g. other ship(s) of the company has/have been detained in US port(s) in recent months), if PAA is deemed unavailable to be conducted, MD may request the company to arrange additional SMC audit and general ship inspection by RO in the first available port in US.

- Completion and verification of PSC Inspection (Pre-arrival) Checklist (Checklist) (<https://www.mardep.gov.hk/en/faq/pdf/let220929a.pdf>)
 - Prior to entering first US port in every voyage, the Checklist shall be duly completed by ship crew, signed by the master and verified by the company DPA / Superintendent, and then submitted to MD. For the purpose of assessing the ship condition and ascertaining the well-functioning of those common detainable items in US, the Checklist, together with photos demonstrating the general condition of the ship, should at least cover the following areas (including but not limited to) should be submitted to MD by email to ss_css@mardep.gov.hk:
 - i) deck – fore and aft, and overview from bridge;
 - ii) lifeboat & rescue boat with their launching appliances;
 - iii) galley (provision and refrigerated store room);
 - iv) toilets;
 - v) bridge;
 - vi) engine room (cleanliness; bilge wells clean without oil; purifier room; main engine; auxiliary engine);
 - vii) testing of main and emergency fire pumps;
 - viii) testing of O.W.S.;
 - ix) testing of emergency generator;

- x) testing of engine room fire dampers;
 - xi) testing of fire alarm system;
 - xii) checking of fixed fire-fighting system;
 - xiii) drills (fire and abandon ship);
 - xiv) checking of immersion suits and lifejackets; and
 - xv) all defects found.
- Prior to entering every other US port, the ship crew shall check/test again those critical items of common detainable deficiencies (i.e. those items as highlighted in red in the Checklist). Photo/Video records should be kept onboard for demonstration upon request.
 - In the following scenarios that the ship's condition is in doubt, MD will request the company to arrange additional SMC audit and extended inspection (EI) by RO in the first available port in US.
 - checklist does not timely submit to MD before the ship arrives the first US port;
 - checklist is found not duly completed, signed and verified;
 - no supporting information (e.g. photos, records) could be provided upon MD's request; and
 - the general condition of the ship is not desirable.
 - If a ship is detained in US port and later being revealed that false declaration has been made in the Checklist, without reasonable excuse, the ship's SMC will be withdrawn immediately and that the company HK-DOC may also be jeopardized.

■ Others

- For any malfunctioned equipment and that spares or replacement parts are not available, the management company/ship master should notify MD and port State before entering port. The management company/ship master are also obliged to make safe alternative arrangements and draw up plan to rectify the deficiencies without delay. Such proactive actions will minimize the chances of a ship being detained.
- The management company should submit application for dispensations to MD without delay if repair arrangement cannot be made due to lack of repair facilities or spare parts in the port.

3. MD will continue to strive our best to maintain high safety standards of HK Ships and endeavour to maintain the QUALSHIP 21 status. To achieve so, we do need your full cooperation and seek your full appreciation of our action taken.

4. Should you have any queries related to PSC inspections or applying dispensation for HK Ships, please do not hesitate to contact Senior Surveyor / Cargo Ships Safety Section by email at ss_css@mardep.gov.hk or by phone at 2852 4510.

5. Should you have any queries related to PAA or Checklist, please do not hesitate to contact Senior Surveyor / Quality Assurance Section by email at ss_qa@mardep.gov.hk or by phone at 2852 4516.

Yours faithfully,

(No signature on website copy)

(W.C. LEE)
General Manager
Ship Registration and Quality Branch
Shipping Division
for Director of Marine