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5 August 2010

To: Ship Owners / Managers

Dear Sir/Madam,

Paris MOU Concentrated Inspection Campaign on Tanker Damage Stability

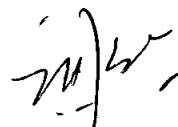
The Paris MOU on Port State Control will conduct a Concentrated Inspection Campaign (CIC) on Tanker Damage Stability commencing from 1 September to 30 November 2010.

2. The reasons for this CIC include that inspections showed tankers frequently sailing when not complying with damage stability requirements or had no means of assessing damage stability or were sailing in a loading condition not covered by the approved stability book
3. The CIC aims to confirm damage stability has been assessed by the ship's staff onboard oil tankers, chemical tankers and gas carriers. During the CIC period, the PSCO will focus on a questionnaire with respect to damage stability in stability information booklet. Five (5) of them are considered critical that any non-compliance of which would 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). In addition management companies and shipboard staff are advised to take the following actions before the campaign:
 - (a) Management companies should distribute this circular letter and guidelines to all Hong Kong ships in the company's fleet to make sure that all shipboard staff are aware of the campaign and urge them to verify compliance with the requirements accordingly;
 - (b) Management companies or shipboard staff should carry out similar inspection to verify the compliance with the requirements of MARPOL Annex I Reg. 28, IGC Code Chap 2 and IBC Code Chap 2 prior to the commencement of the campaign, if applicable;
 - (c) Management companies should ensure that masters and senior officers onboard ship could communicate effectively with PSCOs, since poor communications shown to the PSCO during interview could lead to ship being detained.
 - (d) If the master of the ship is not able to demonstrate that any loading conditions other than those covered by the approved stability information booklet has been verified by an acceptable alternative methods, the ship may be detained.

5. 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.

6. 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 Paris MOU Concentrated Inspection Campaign on Tanker Damage Stability

Introduction

The Paris MOU on Port State Control will conduct a Concentrated Inspection Campaign (CIC) on Tanker Damage Stability starting from 1st September 2010 to 30th November 2010. The CIC will mean during every PSC inspection of oil, gas and chemical tanker within the Paris MOU region, the stability information book and relevant documentation shall be verified for compliance with applicable regulations.

Purpose

The purpose of the CIC is

- To gather information regarding the application of damage stability to tankers.
- To ensure existing IMO instruments are enforced in a consistent manner.
- To minimize risks to tankers and the seafarers who operate them.
- To minimize risks to the environment from loss of marine pollutants.
- To ensure non-compliant vessels are identified and brought into compliance.

Issues to be attended

The Campaign will focus on the following questionnaire with respect to damage stability in the stability information booklet. Five of them (refer those marked with “*”) are considered critical that any non-compliance detected by a Port State Control Officer (PSCO) may result in ship detention. Management companies and shipmasters should pay special attention to the following issues especially those questions marked with “*”:

The Questionnaire of CIC

During the CIC, PSCOs will apply the following questionnaire to cover the campaign:-

No.	Question
*1	Does the ship have an approved stability information booklet (SIB)?
*2	Is the SIB written in a language understood by the master?
*3	Does the approved stability information cover damage conditions?
4	Can the master demonstrate that the ship is normally loaded in accordance with the SIB?
5	Has the master verified an alternate loading condition by written authority from flag/class?
6	Has the master verified an alternate loading condition by assessing loaded condition against critical damage KG data, included in the approved stability information?
*7	Is there an on-board stability computer program that includes damage stability?
*8	Has the master verified an alternate loading condition by using the on-board stability computer program for carrying out damage stability checks?
9	Was the ship detained as a result of this CIC?

Guidance to ship's master for each question:

Questions 1 to 3 are to verify that both the approved intact and damaged ship stability information are available on board and that is understood by the ship's master and relevant officers. Question 4 and onwards is to ensure the actual compliance of the damage stability requirements. Any answer from Q4 to Q8 is "Yes" means the damaged stability has been taken into account and remaining questions can be considered as "N/A".

Q1. The ship's master should provide with SIB approved or provisionally approved (for new ship or ship which has recently changed flag) by one of the classification societies who would stamp and date the SIB with "Approved (or Provisionally approved) on behalf of the flag state". If no SIB can be provided, the PSCO would consider the detention of the ship.

Q2. The ship's master should show to the PSCO that the content of the SIB is understood by himself and relevant officers who may have responsibility for loading. The SIB should be written in the working language of the ship or in English. If the SIB was not written in a language understood by the master, the PSCO would consider the detention of the ship.

Q3. The ship's master should ensure that the SIB has covered the approved damage calculations for different conditions of loading if the ship suffers side or bottom damage. If no such damage calculations were found on the SIB, the PSCO would consider the detention of the ship.

Q4. The ship's master should be able to demonstrate the sailing condition is approved by showing that the loaded condition of the ship always complies with an approved condition of loading from the SIB which includes intact and damage stability.

Q5. If answer to Q(4) is No, the ship's master needs to provide written authority from flag/class that the alternative loading condition is acceptable.

Q6. If answer to Q(5) is No, the ship's master is permitted to assess an alternate loading condition by comparing the critical damage KG or GM data in the approved Damage Stability book. However, the ship's master should ensure the critical data are present clearly and with sufficient guidance for correct application.

Q7. If answer to Q(6) is No, the ship's master should show the PSCO that the on-board approved stability computer program or loading instrument that includes damaged stability calculation is available and has been used for assessing the damage stability condition. If the ship's master cannot demonstrate the stability program has been used to assess the damage stability of a loaded ship before departure, the PSCO would consider the detention of the ship.

Q8. The ship's master should confirm that the stability computer program has been used to verify damage stability in the form of a print out showing the loaded condition and confirming compliance with a loaded condition. If the ship's master cannot do that the PSCO may raise a deficiency or would consider the detention of the ship.

Q9. The ship's master should be well prepared and understood the correct answers for Q1 to Q8 above to answer the queries by the PSCO. If the ship's master finds it difficult for him to answer these questions or the ship is not complying with the requirements, he should inform the company immediately to get the proper answers or to have the defects rectified immediately to avoid detention of the ship.

Relevant IMO Instruments and Information

1. Tankers should be loaded to ensure compliance with intact and damage stability requirements. The SIB gives certain loading conditions to ensure that the ship will survive bottom or side damage as per the applicable requirements of either MARPOL/IBC/IGC Codes depending on the type of ship.

2. If the ship is loaded outside these conditions then the ship's master needs to show that the ship will still survive damage, most commonly this would be proved using a stability program that includes damage.

3. All ships must comply with longitudinal strength, intact stability and damage stability requirements. For tankers (oil, gas, chemical) they must comply with the following mandatory instruments:
 - Longitudinal Strength – Load Line ILLC Annex I, Chap I/Reg 1 Strength of Hull
 - Intact Stability – Load Line/MARPOL. ILLC, Chap I *“The Regulations also assume that where there are international requirements relating to stability or subdivision, these requirements have been complied with.”*
 - Damage Stability – Oil Tankers MARPOL Annex I Reg 28
Gas Tankers IGC Code Chap 2
Chemical Tankers IBC Code Chap 2

4. Typical stability approval at build comprises:
 - Approved Intact Stability Information Booklet (SIB)
 - contains sample intact loading conditions • on approval, these intact loading conditions are themselves deemed to be “approved” for use
 - Approved Damage Stability Booklet (DSB)
 - usually a separate submission
 - demonstrates only that the approved intact loading conditions will survive the extent of damage required by the applicable Convention (MARPOL) or Code (IGC, IBC) and achieve the minimum residual stability standard
 - the damage stability submission will occasionally take the form of critical KG or GM data which are intended to permit any condition of loading (including those in the SIB) to be assessed against pre-determined tables.

5. Every tanker should have approved stability information on board which details intact loading conditions and damage calculations for different conditions of loading and should have relevant certification:
 - Oil Tankers – IOPP Certificate and Form B
 - Gas Tankers – Certificate of Fitness
 - Chemical Tankers – Certificate of Fitness

6. Master and owners responsibilities:
- paragraphs 1.4.1 and 1.4.2 of the ISM Code
 - paragraph 7 of the ISM Code.
 - SOLAS Reg II-1/5-1
 - MARPOL – Annex 1 – Reg 28.5
 - IBC Code – 2.2.5

Ship Safety Branch
Marine Department
5 August 2010