



Office of
Deputy Commissioner
of Maritime Affairs

THE REPUBLIC OF LIBERIA

LIBERIA MARITIME AUTHORITY

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Marine Advisory: 14/2012

Subject: GUIDANCE ON PORT STATE CONTROL INSPECTIONS

Dear Shipowner/Operator/Master;

This Advisory is to provide assistance and guidance regarding Port State Control (PSC) inspections.

Port State Control authorities are becoming more aggressive during this period of economic downturn and are finding an increase in deficiencies due to lack of maintenance and training. Detentions are increasing as result of deficiencies for required equipment not working properly, cleanliness (excessive oil) in machinery spaces, vessels not being adequately supplied and maintained, and inadequately trained crews. In addition, more PSC inspectors are issuing detentions for failure of the ships safety management system when several deficiencies are noted which, when taken separately, would not otherwise be reason for detention. PSC detentions are time and resource consuming events for ship-owners and operators, which will add more to a company's operating costs than proper maintenance and training. This Administration has prepared guidance to assist owners and operators preparing their vessels for PSC inspections in order to minimize deficiencies and prevent PSC detentions.

The PSC Inspection Process: During a PSC inspection, the Inspector will first conduct an initial inspection, which includes examination of the ship's and crews' certificates, an inspection of critical areas and equipment which will probably involve a fire and abandon ship drill. If the inspector is of the opinion that the vessel is substantially in compliance after the initial inspection, then no further inspection should be necessary. **Therefore, it is essential that the Master and crew demonstrate a positive first impression. This will reduce the time the inspector(s) is/are on board and may prevent an in depth inspection (the attached checklist has been developed to assist).**

More detailed Inspection: If the ship or crew's certification is incomplete or invalid, or if there are clear grounds to suspect that the ship and/or its equipment or crew may not be in substantial compliance with the requirements, a more detailed inspection will usually be undertaken. A more detailed inspection is expanded in scope and increases the chance of disrupting the ships schedule and delay in the port, if deficiencies are found that require correction or that lead to a detention. A record of serious deficiencies and detentions can lead to more frequent PSC inspections and negative PSC and safety compliance ratings on a vessels and the ship managers.

Guidance to Masters: The attached check list with the document "General Guidance for Masters to ensure a Positive PSC Inspection" on Port State Control Inspections" shows the most

common detainable deficiencies. **Identifying and reporting these deficiencies to this Administration, Class, and local Port State Authorities prior calling the port can help to prevent the issuance of a detention order.**

PSC Guidance: *IMO Resolution 1052(27) provision 2.3.7* states that if a Master advises his Administration, Class and local Port State Authorities of a deficiency that has, or may, impact the vessel's seaworthiness, that deficiency should not be considered as grounds for detention, unless the ship intends to sail with the deficiency un-addressed. This does not mean that a deficiency will not be recorded, or that the vessel will be permitted to depart without rectifying a normally detainable deficiency. It simply means that actions to rectify the deficiency will be monitored to ensure proper remedial actions are taken, and that the vessel can be considered to be seaworthy before it is allowed to depart. Most importantly an IMO detention and a corresponding record will not be recorded against the vessel or the vessel operator.

Reporting: Even if the deficiency has not been reported by the ship or company prior to arrival, most PSC inspectors provide an opportunity for the Master at the opening meeting of a PSC inspection to declare, whether any known defects exist, prior to the inspection commencing. The Master should directly inform the inspector about the deficiencies and what remedial actions are in place. In doing so, it is possible that the Master may avoid a detention or even a deficiency being assigned.

Flag Assistance: In case of a defective device or problems with the vessel's statutory certificates or crew's certificates, this Administration can assist in several ways, which may prevent a detention.

Please contact this Administration in Vienna Virginia at technical@liscr.com or safety@liscr.com (afterhours please contact the Duty Officer at +1 703 963-6216), or one of our regional offices in: Dubai, Hamburg, Hong Kong, London, Piraeus, Singapore, or Tokyo.

For more information please contact the Safety Department at safety@liscr.com or telephone +1 703 251 2409

Reports on active PSC countries: We have analyzed the data for the first half of 2012 and discovered a "detention pattern" in several active PSC countries.

Australia: Australia has been and continues to be the most active country in detaining vessels. AMSA targets predominantly older General Cargo Vessels and Bulk Carriers.

The following detainable deficiencies are commonly reported:

- Jacketed piping system for high pressure fuel lines
 - o Leakage alarm devices out of order, Jacket piping or Protective cover not be provided, Jacketed pipe broken
- Lifeboats
 - o On-load release defective, lifeboat engine could not start, Auto drain valve Missing

- Fixed fire extinguishing installation
 - o CO2 pipe of fixed extinguishing system not operational / deteriorated and/or broken
- Possible SMS failure (in combination with other detainable deficiencies)
 - o Ship's SMS fails to ensure emergency preparedness and maintenance of ship equipment
- Hours of work and rest (STCW 78/95)
 - o Other log book entries contradict the record of hours of work and rest, the recorded hours of work and rest indicate a member of the crew is not getting adequate rest.
- ECDIS
 - o ECDIS is listed in the ship's record of equipment is not being used for navigation
 - o Officers in charge of navigational watch are not appropriately trained

China: Chinese Port State Control is reporting, as detainable deficiencies, valid defects, which we believe are not always detainable deficiencies, but this is difficult to appeal. Before calling a port in China the following items should be inspected in detail:

- Fire dampers,
- Cleanliness of the Engine Room,
- Jacketed piping system for high pressure fuel lines
 - o Leakage alarm devices out of order, Jacket piping or Protective cover not be provided, Jacketed pipe broken

During a PSC inspection in China a vessel was detained during cargo operations while being alongside because the Chief Engineer and Second Engineer were simultaneously ashore. We successfully appealed this detention because according to STCW VIII Part 4-WATCHKEEPING IN PORT there is no requirement that prohibits the Third Engineer from assuming the watch while in port during cargo operations. However, according to the national "Act on Minimum Safe Manning of People's Republic of China" it is prohibited that the Chief Engineer and Second Engineer go ashore simultaneously when calling a Chinese port. Noncompliance can lead to fines.

India: We have experienced a substantial increase in the detention rate for vessels calling Indian ports. Most detentions are due to:

- Missing or no original certificates for the vessel and/or crew
- Non-operational sewage water treatment plants

Singapore: We have had a substantial increase in Singaporean detentions for the first half of 2012. All detentions were related to the **Arcs of Visibility for the Navigation Light**, mainly the Masthead light was not correct (on two separate occasions it appears a stern light (135°) was fitted where a mast head light (225°) should be fitted), or the bulb provided insufficient luminosity. The correct installation of the Navigation lights should be checked.

Turkey: Traditionally the port of Mersin has been very active in detaining vessels, predominantly Reefers and Bulk Carriers. The following deficiencies have led to most detentions:

- Cleanliness of the Engine Room
- Fire alarm bells inoperative

United States: When calling the United States it is essential that the OWS is in working condition and the crew is able to operate the device.

Incorrect entries in the oil record books can lead to a detention: Port state control officers are requiring ships' Chief Engineers to demonstrate that what is recorded in the oil record book is the same as the electronic record retained by the oil monitoring device.

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General Guidance for Master's to ensure a Positive PSC Inspection / PSC Compliance Checklist

“A clean, orderly ship, with a trained and confident crew will ensure a positive PSC inspection”

Ex PSC Inspector

During visits by Port State Control Officers (PSCO) it is essential that the conduct of the Master and crew be professional.

- ❖ If PSCO officer boards the vessel they should be met at embarkation and asked for their identification (ISPS CODE) and escorted to the Master's office. Require an opening meeting—even if not offered. Ensure a suitable business like atmosphere.
- ❖ Properly introduce key officers/personnel and ask for the same courtesy in return. Ensure that the lead in the official PSC party is identified. All key staff should be present unless duty requires otherwise, in which case this should be explained.
- ❖ The inspection procedure contemplated by the PSCO should be explained. If not, ask for an explanation.
- ❖ **Inform the PSCO of any problems with required equipment, including repairs and corrective action that is ongoing and/or dispensations that have been issued by the flag Administration, to allow time needed to affect repairs.**
- ❖ Identify ship's officers who will assist in key elements of the inspection. Identify their PSCO counter-part.
- ❖ Escorting ship's officers should always be professional and knowledgeable of ships equipment.
- ❖ Escorting ship's officers should keep notes on deficiencies noted by PSCO.

- ❖ Request notification of irregularities as soon as possible in order to affect corrections “on the spot”.
- ❖ Never intentionally misrepresent a condition to the PSCO.
- ❖ Insist on a closing meeting--even if one is not offered.
 - Listen to what the senior boarding officer says about the boarding results
 - Compare it with what he writes--ask for clarification/corrections if necessary
 - Ensure by direct question-- “We see nothing here suggesting a detention”
- ❖ If the vessel is detained, notify the company immediately in accordance with company procedures. The flag Administration should also be notified as soon as possible.
- ❖ Ensure the inspection team is escorted at debarkation.
- ❖ **A good first impression of an orderly ship decreases the risk of an expanded inspection:**
 - The Master’s office shall be presentable and the records organized and available, and
 - Standards of dress shall be high. The vessel’s topside and engine room shall be clean and orderly.
- ❖ **Be aware of cultural differences:**

Even when there are defects it is possible to prevent a detention. However, the Crew, Company, Recognized Organization, and Flag must be proactive and show that they have identified the defect and are taking appropriate corrective action.

The items listed on the attached check list represent the most common deficiencies.

When equipment is not functioning as required and cannot be repaired prior to arrival in a port, it is essential to contact this Administration at Safety@liscr.com, (if possible) prior to arrival. Liberia will issue a dispensation to present to PSC in order to avoid a possible detention.



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PRE ARRIVAL COMPLIANCE CHECKLIST

Ship's Name: _____

IMO No.: _____

Date: _____

Next port of call:

Date of call:

Item	Common Detainable Deficiency	Yes/No (fill out each bracket individually)	Comments
Record of Ship's Statutory Certificates incomplete	Is the Statutory certificates folder complete and up to date? Best if there is an index in the front of the folder to assist the PSC inspector when reviewing these certificates.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
Missing Liberian certificates for Master and Officers	Do the Officers have either a Liberian Certificate of Competency, Endorsement or CRA?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
Missing Liberian Certification for the crew	Do the Ratings required by the MSMC have either Liberian Endorsements, or copy of the application for the endorsement and their valid national certificate?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
Insufficient hours of rest and possible fatigue	Do the rest periods comply with STCW requirements? Note: The period is over any 7 days and not one calendar week.	YES <input type="checkbox"/> NO <input type="checkbox"/>	

Missing record regarding a drill	Were the drills done when required and recorded as required?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
Lack of maintenance	Is the ship clean and orderly and do the records reflect that the SMS is being followed?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
Defective fire dampers, quick or self-closing devices, remote controls, etc.	Are handles and wires in good condition?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Do dampers and closing devices, to include fire screen doors, and watertight doors close correctly?	YES <input type="checkbox"/> NO <input type="checkbox"/>	

If ECDIS is listed in the ship's Record of Equipment (If ECDIS is not listed in the ships record of equipment but used for convenience only, paper charts <u>must</u> be used for passage planning and navigation)	Is ECDIS being used for Navigation? (if not detainable deficiency)	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Is the ECDIS using appropriate official electronic charts with latest updates and corrections?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Are the officers in charge of navigational watch appropriately trained and competent to use ECDIS?	YES <input type="checkbox"/> NO <input type="checkbox"/>	

E/R fixed CO₂ fire fighting system	System Operational?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Temporary safety pins used for installation and servicing removed and bottles connected?	YES <input type="checkbox"/> NO <input type="checkbox"/>	

Oily water separator & 15 ppm alarm	Separator operable?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Wasted discharge line?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Inside of discharge pipe oily and dirty?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Any by-pass line fitted to oil filtering equipment?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	15 ppm alarm operable?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Automatic stopping device operable?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Are the C/E and 2/E able to demonstrate the operation of the OWS?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Does the electronic record in the monitor reflect the record in the Oil record book?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
Fire Pumps inoperable/inefficient (Especially the Emergency fire pump)	Are pumps individually tested with two hoses supplying water to the extremities of the vessel and water pressure is checked?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
Defective lifeboat launching arrangements	Is there any corrosion or wastage of lifeboat davit or of sheaves and hooks?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Is the on load release gear operating normally?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Is the on load release gear properly set?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
Inoperable lifeboat engine	Is the lifeboat engine operating normally?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
Marking of lifesaving and emergency equipment storage, vents, air pipes, etc.	Is the equipment storage clearly marked and in good working condition?	YES <input type="checkbox"/> NO <input type="checkbox"/>	

Cleanliness of E/R

Is the E/R clean? No oil leaks, clean bilges and tank tops, no oily rags, and no collection buckets or containers placed below machinery or pipes to collect seepage or leaks.

YES NO

Empty rectangular area for notes or observations.