First Safety Meeting of Ship Management Companies in 2019

Subject: PSC

China Classification Society
January 2019

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I. Overview of PSC inspection in 2018

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I. Overview of PSC inspection in 2018

Overall situation:

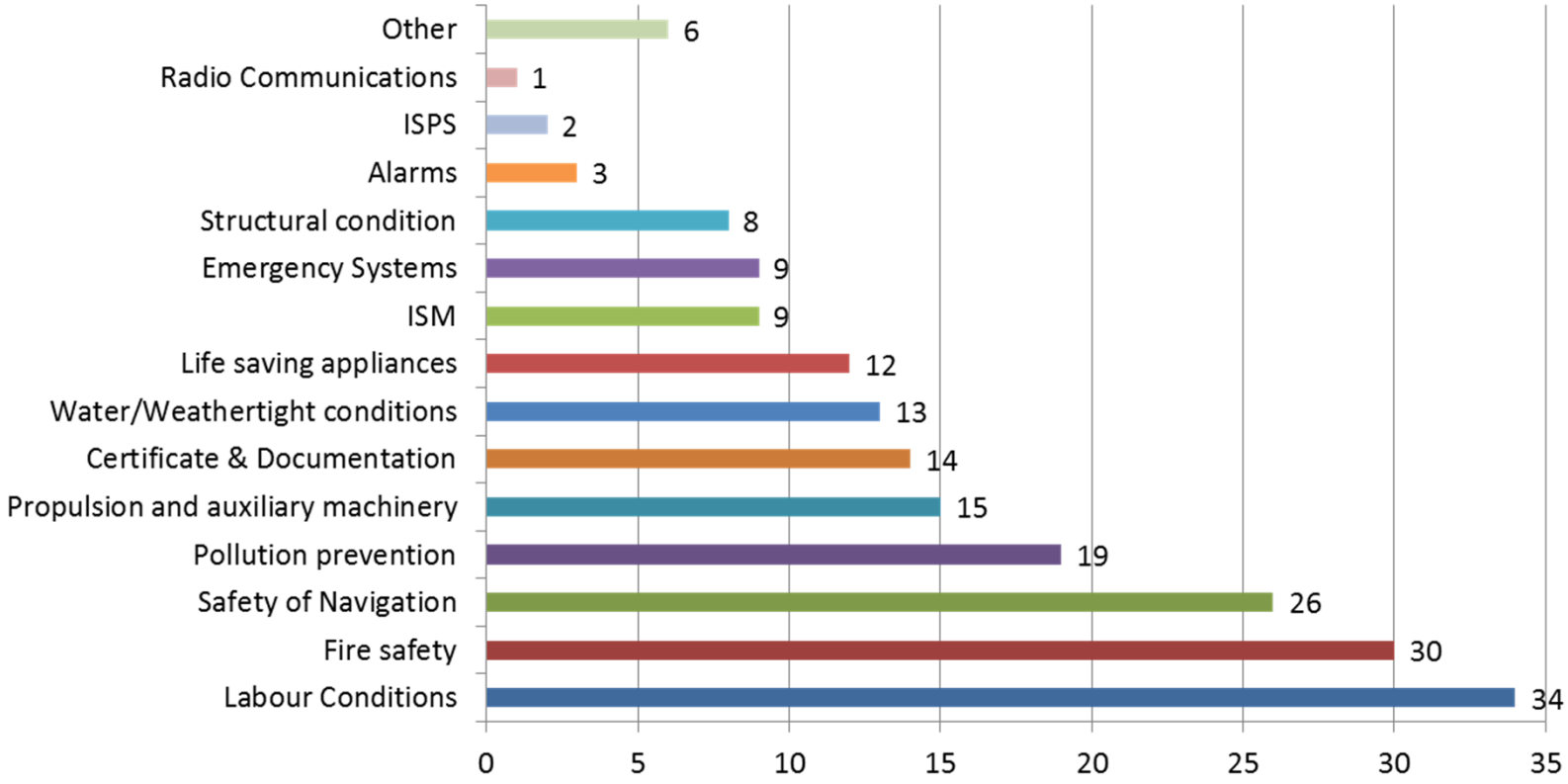
- **Tokyo MOU: 3238 CCS vessels were inspected by PSC, 15 of which were detained, with a detention rate of 0.46%.**
- **Paris MOU: 302 CCS vessels were inspected by PSC, 4 of which were detained, with a detention rate of 1.32%.**
- **USCG: 381 CCS vessels were inspected by PSC, 1 of which were detained, with a detention rate of 0.26%.**
- **In summary, the three PSC authorities have inspected 3,921 CCS vessels and detained 20 vessels, with a detention rate of 0.51%.**
- **In addition, 1 ship was detained in Iran.**

Thanks for your great contribution to reducing PSC detention.

I. Overview of PSC inspection in 2018

Deficiency statistics

Detention reports are issued to 21 CCS vessels for investigation and treatment, all of which have 201 deficiencies in total, and the average deficiency of the detained vessels is 9.57.

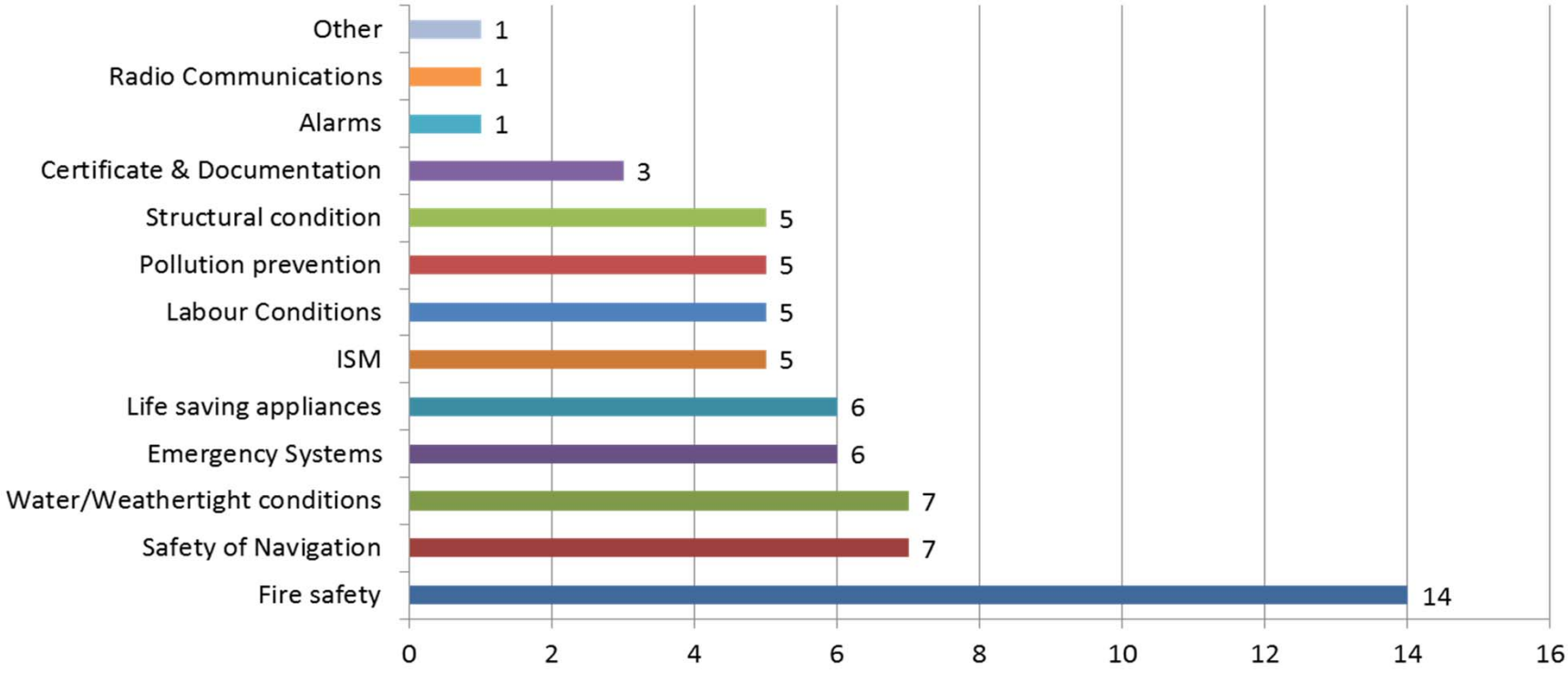


Deficiencies are mainly involved in labor conditions, fire safety, navigation safety, pollution prevention and machinery equipment.

I. Overview of PSC inspection in 2018

Statistics of detention deficiencies

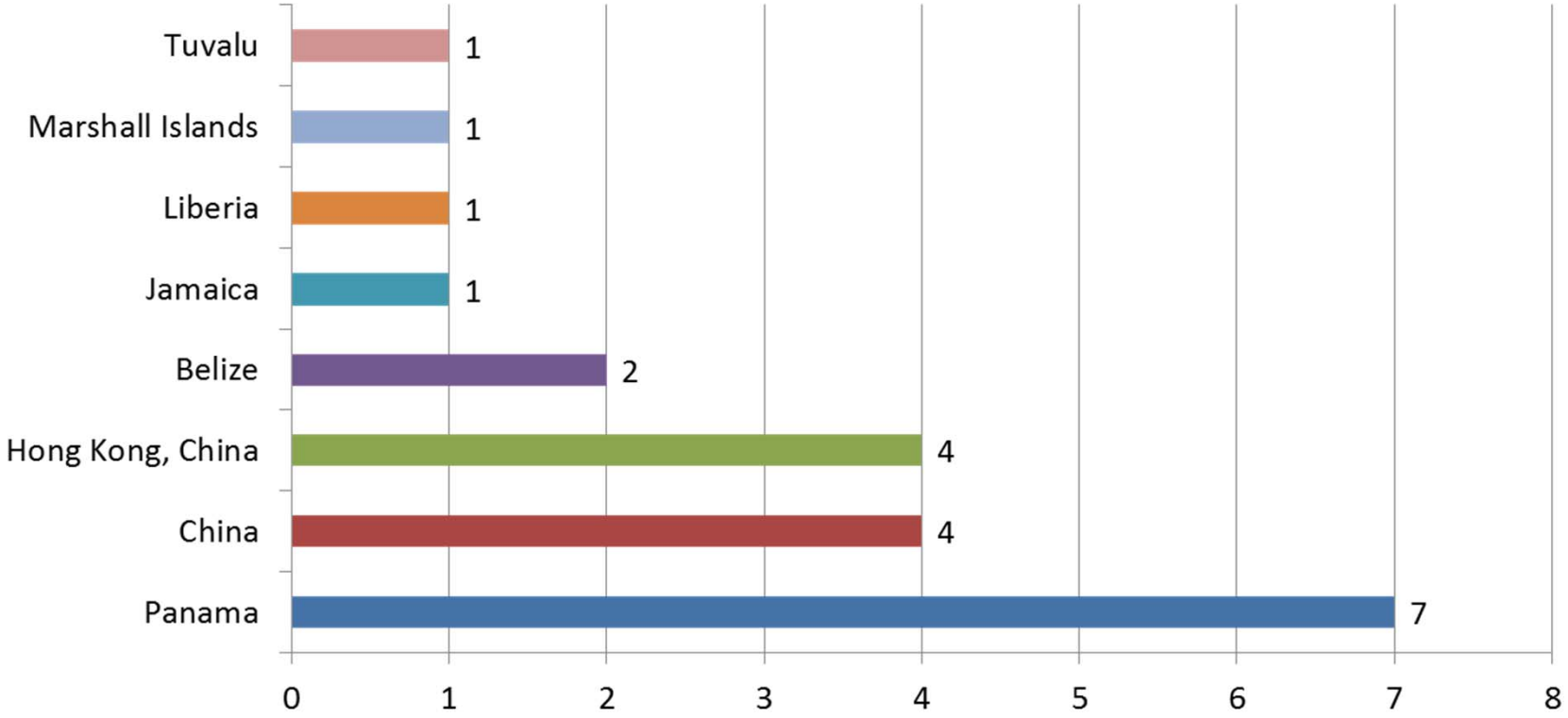
Detention reports are issued to 21 CCS vessels for investigation and treatment, all of which have 66 detainable deficiencies in total, and the average detainable deficiency of the detained vessels is 3.14.



Detention detainable deficiencies are mainly involved in the fire safety, weather tightness, navigation safety, emergency system and life-saving equipment.

I. Overview of PSC inspection in 2018

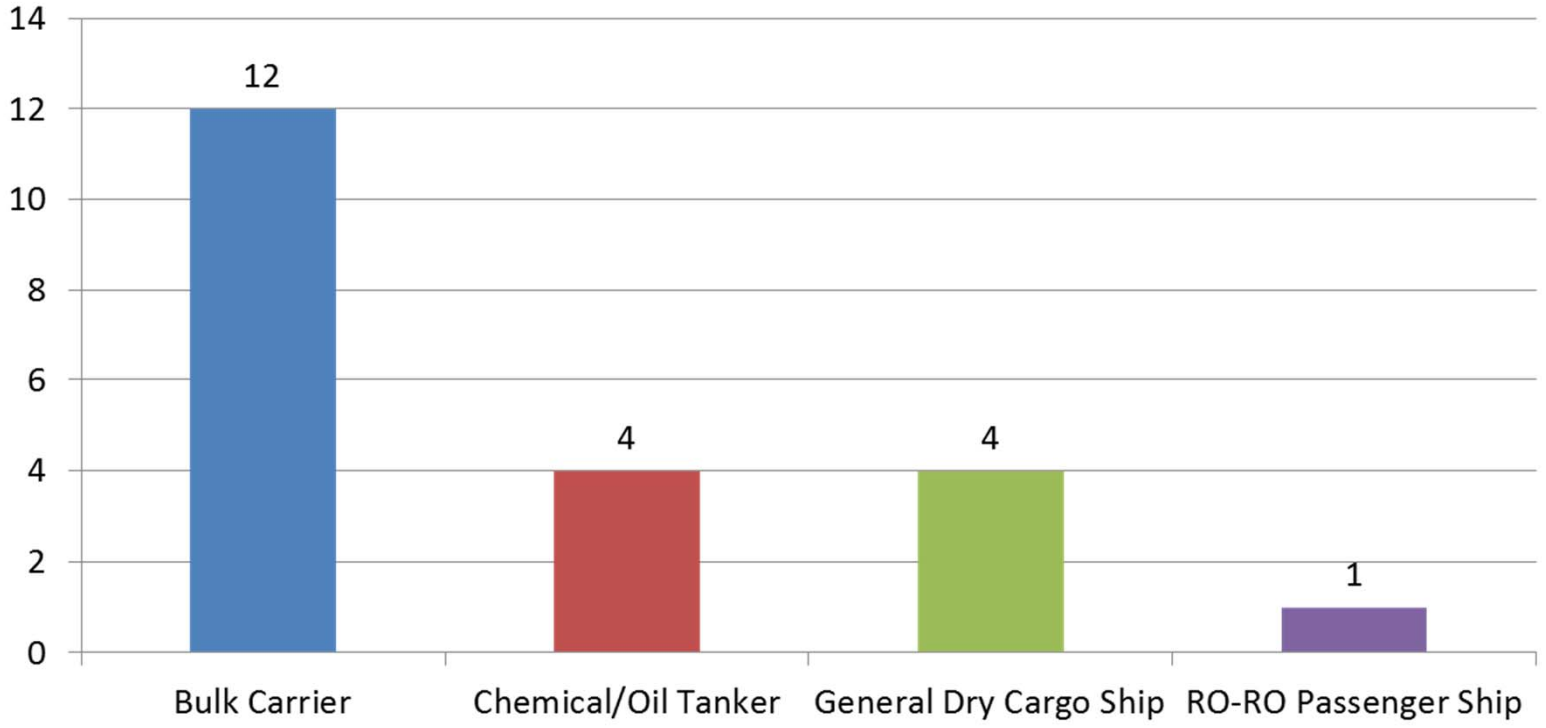
Flag distribution of detained vessels



From the perspective of number of vessels detained, most of them are from Panama, China and Hong Kong. Among the CCS fleet, vessels from Tuvalu, Jamaica, Belize and Panama have relatively high detention rates of 100%, 100%, 14.28% and 3.80% respectively.

I. Overview of PSC inspection in 2018

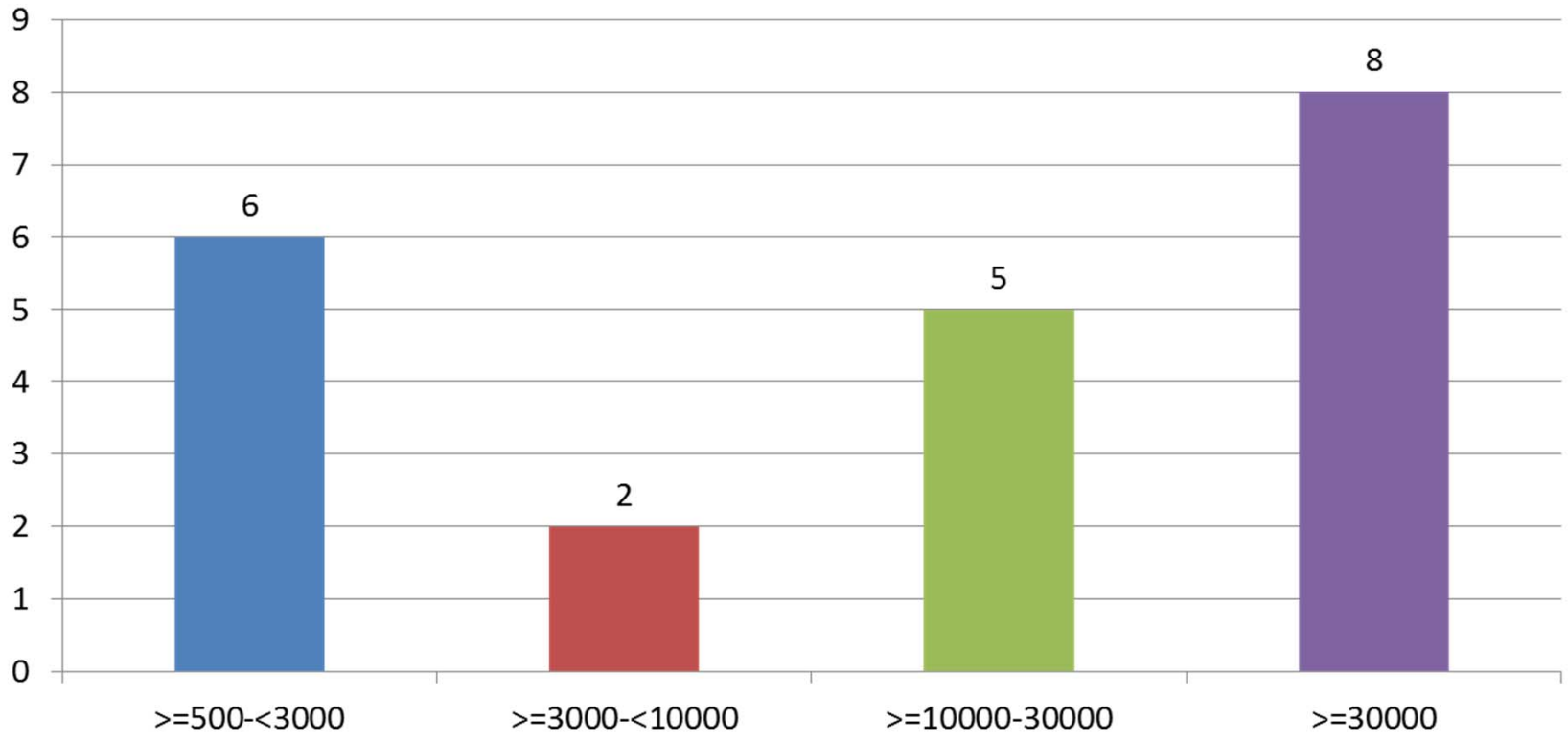
Type distribution of detained vessels



Bulk carriers, general dry cargo ships and chemical/oil tankers account for 57.14%, 19.05% and 19.05% of the detained vessels respectively.

I. Overview of PSC inspection in 2018

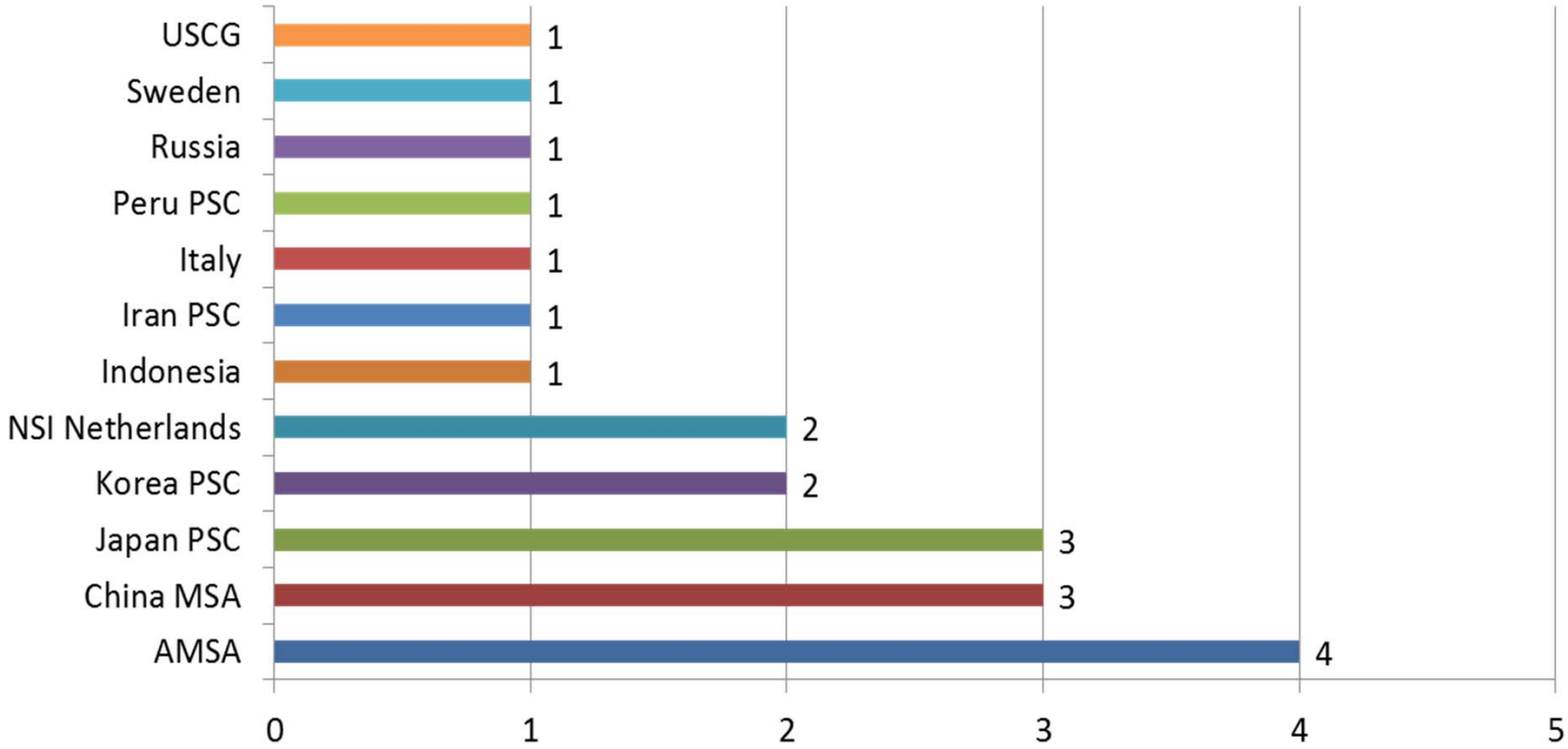
Gross tonnage statistics of detained vessels



Most detained vessels are more than 30,000 tons, accounting for 38% of the total. Followed by those, the vessels with the tonnage no less than 500 and no higher than 3,000, account for 29%.

I. Overview of PSC inspection in 2018

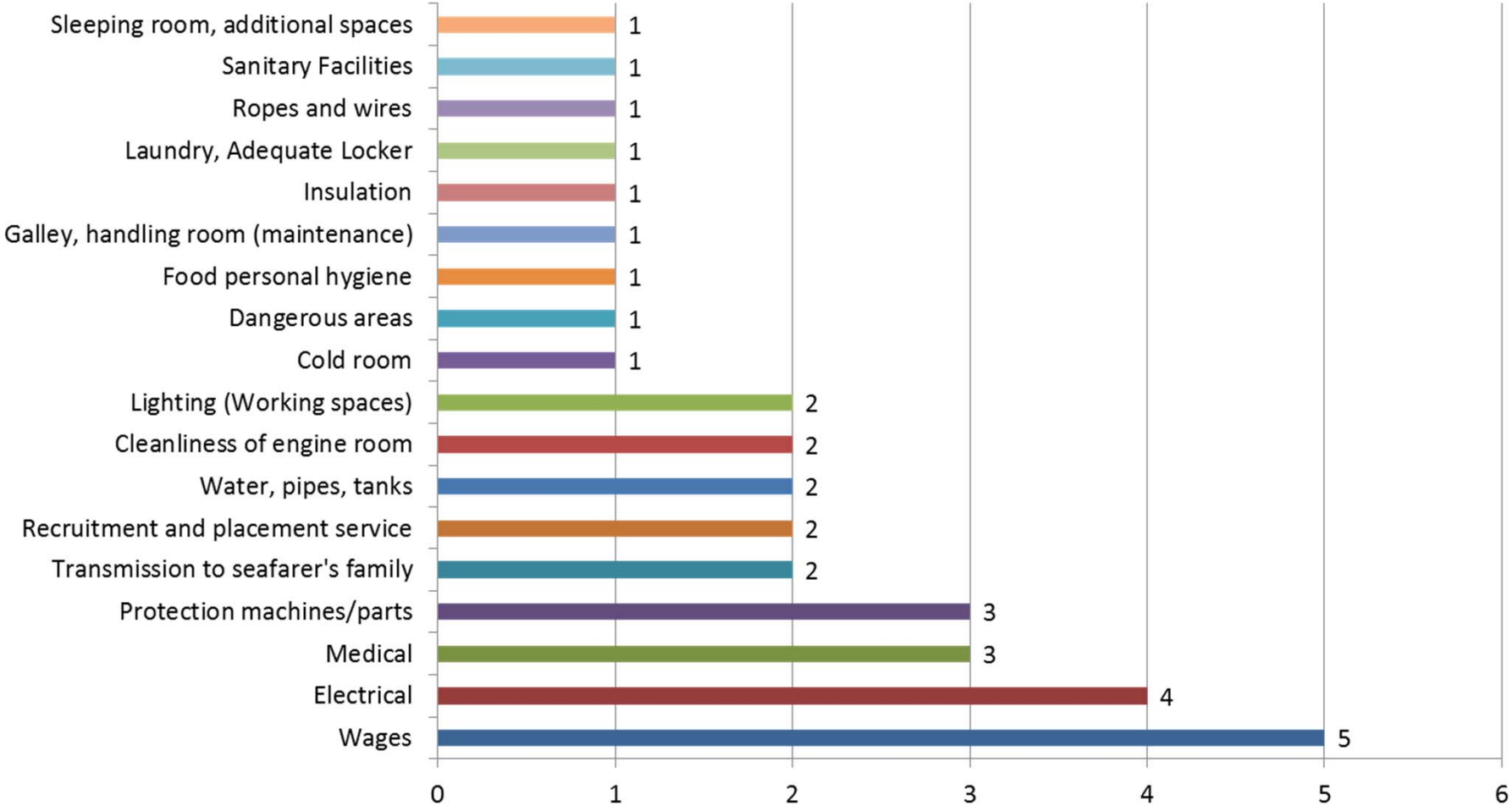
Distribution of ship detention PSC regiums



Vessels sailing to Australia, Japan and China have a high detention times, and those to voyage in Europe have a high detention risk.

I. Overview of PSC inspection in 2018

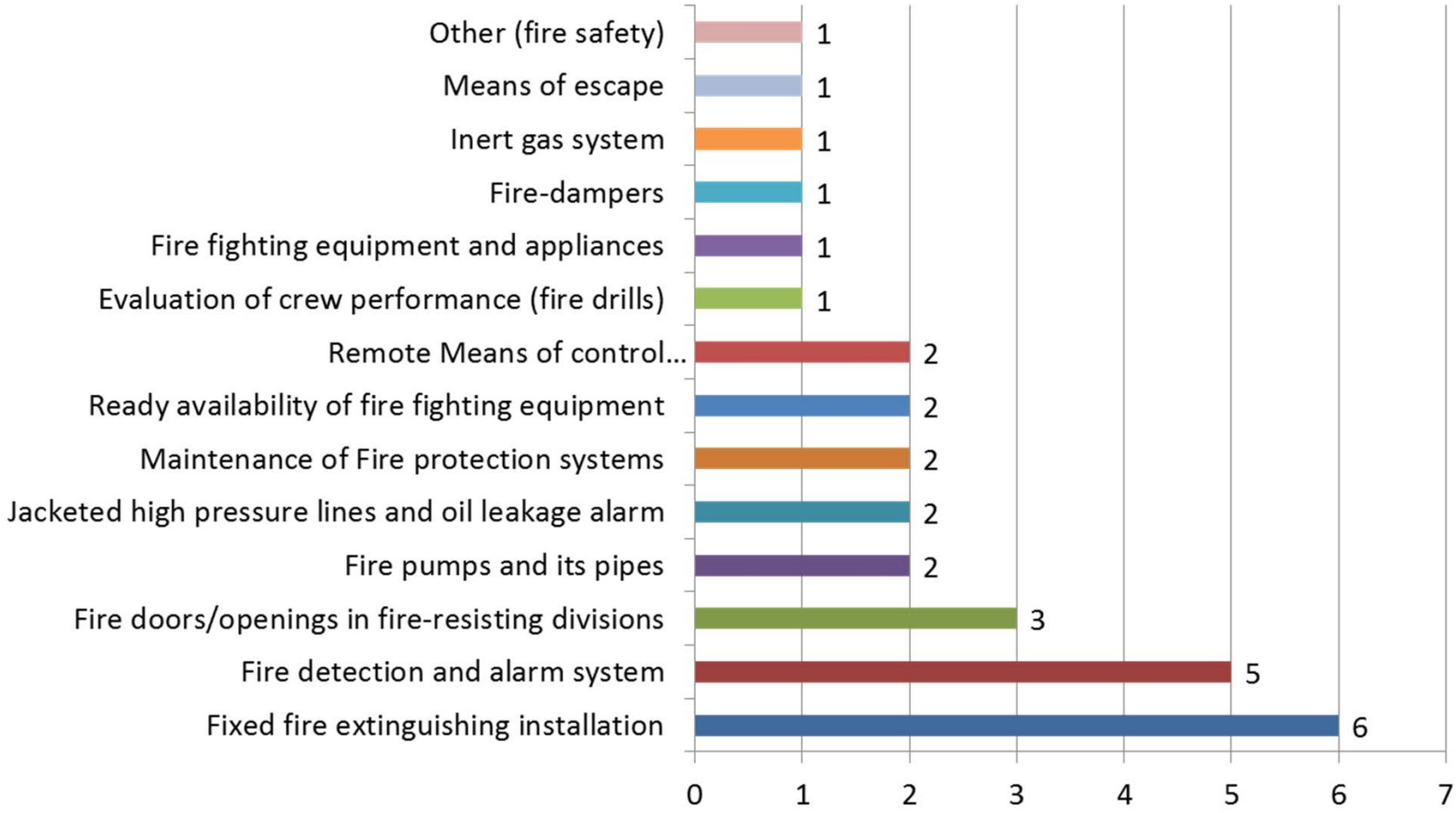
Statistics on major deficiencies - Labour convention



Deficiencies are mainly involved in the salary, electrical, medical treatment and safety protection, and salary deficiencies will generally lead to detention.

I. Overview of PSC inspection in 2018

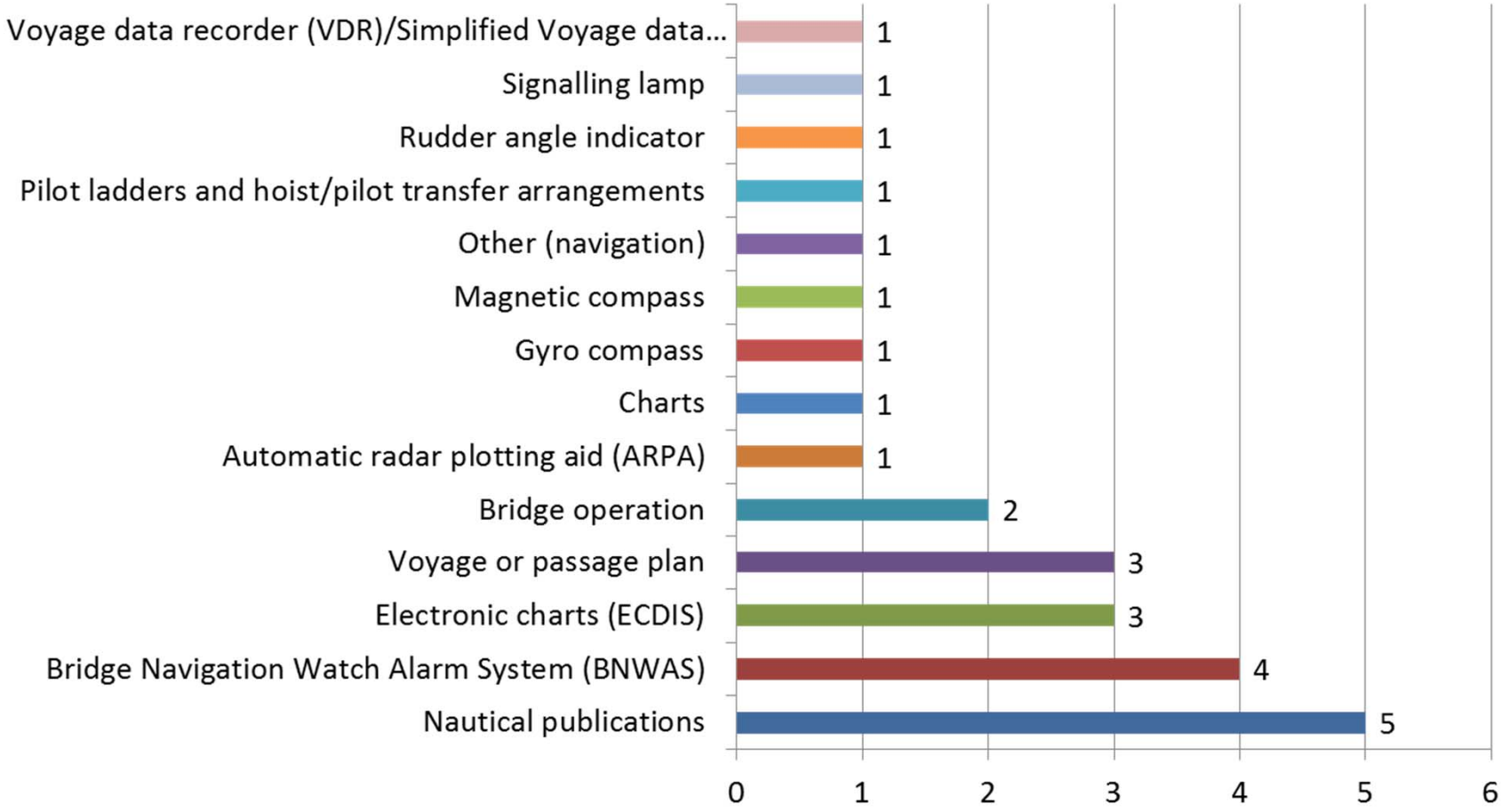
Statistics on major deficiencies - Fire safety



Deficiencies are mainly involved in fixed fire fighting equipment, fire detection and alarm, fire doors and other aspects, and fire deficiencies may lead to detention.

I. Overview of PSC inspection in 2018

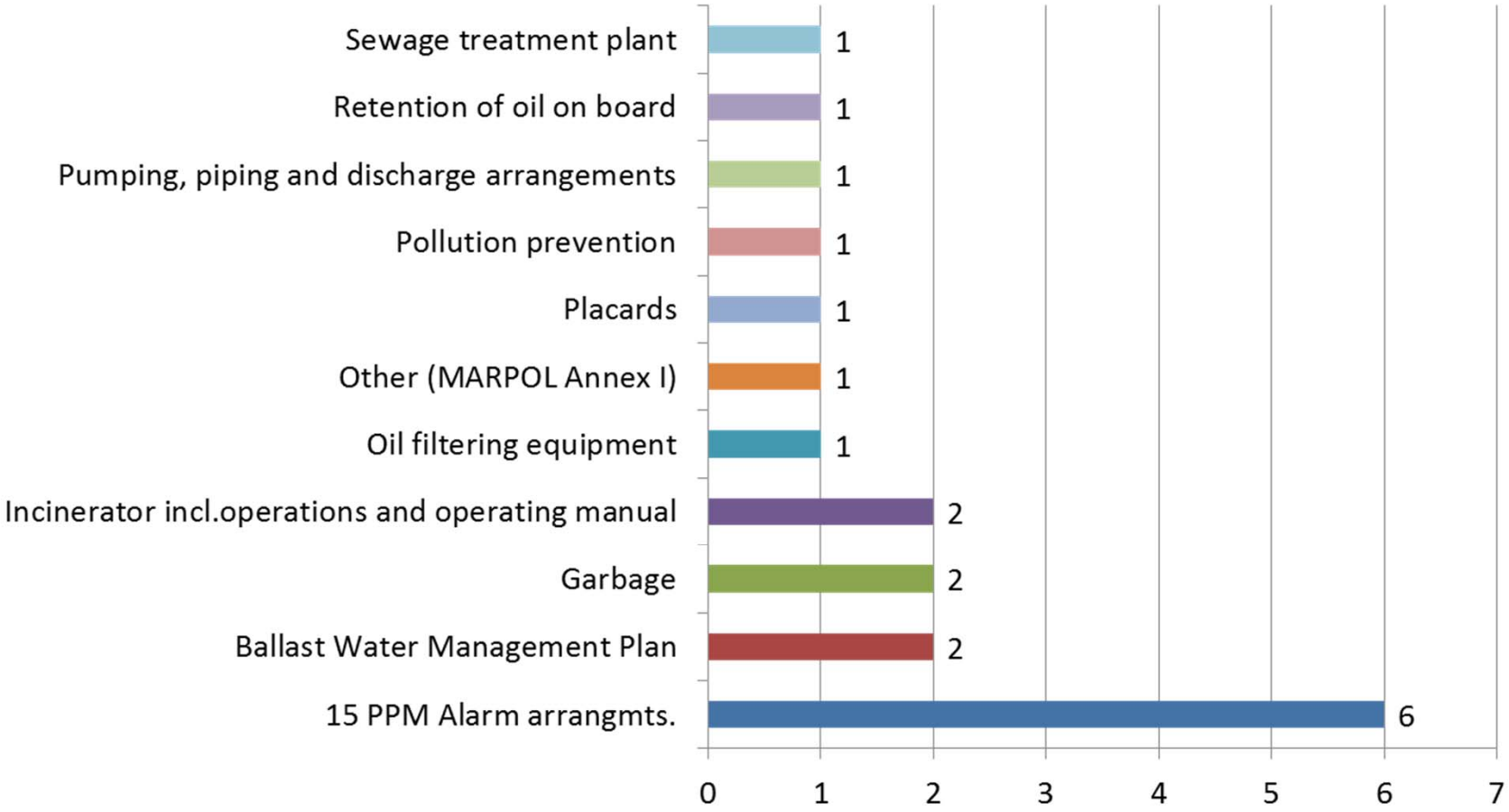
Statistics on major deficiencies - Navigation safety



Deficiencies are mainly involved in navigation publications, bridge duty alarm, electronic chart and navigation plan.

I. Overview of PSC inspection in 2018

Statistics on major deficiencies - Pollution prevention



Deficiencies are mainly involved in 15PPM alarm, ballast water management plan, garbage and incinerator, and deficiencies in 15PPM alarm, oil-water separator and domestic sewage device will all lead to ship detention.

II. Typical detention cases in second half of 2018

Case 1: August 14, 2018 - Rizhao, China

Detention deficiencies: 1. Failure of main electronic chart system; 2. Display screen failure in Station C of GMDSS equipment; 3. Fire dampers of two air funnels in engine room are fault and partially damaged.

Investigation:

- During the inspection, PSCO required the second mate to operate the ECDIS, and was told by the second mate that the main ECDIS was fault and one ECDIS was damaged in four voyages from August 4, 2018 to August 14, 2018.
- After PSCO required to switch the power supply of Station C, the display screen of Station C was fault and failed to function.
- PSCO required to carry out a closing test on the fire damper of engine room ventilator, finding that 3 blades of fire dampers for B111 ventilator are deformed and failed to be fully closed, and 1 blade of the fire damper for B112 ventilator falls off.

Lessons:

- The shipowner did not apply to the flag state and classification society for exemption and inspection, nor did he/she report to PSC for the damaged electronic chart during 4 voyages;
- The crew does not fully inspect and test the equipment at ordinary times, failing to identify and solve problems in time,. The case belongs to the deficiency in vessel maintenance.
- In case of failure in key equipment, no crew reports to the competent authority of port state and RO of classification society when the crew has no ability to solve the problem. SMS was not implemented properly by the ship and ship's company.

II. Typical detention cases in second half of 2018

Case 1: August 14, 2018 - Rizhao, China (continued)



Damaged damper of ventilaor

Blocked air supply recoil pipe of domestic sewage treatment device





Not tightly closed weather-tight door on the deck

Daylight signaling light and portable battery not put together, resulting in that they cannot be used instantly



II. Typical detention cases in second half of 2018

Case 2: September 2, 2018 - United States

Detention deficiencies: 1. The vessel's SMS does not contain any checklists or procedures for testing the inert Gas system alarms and shutdowns. Furthermore, when conducting a test of the high temperature alarm for the Inert Gas System, the crew created an unsafe condition by completely pull off the sensor and introducing flue gas into the engineering space. 2. The radio batteries have been expired since April 2017 and the vessel's crew was not familiar with proper testing procedures. Additionally, the vessel's SMS specifically states to verify that the batteries for the radios are not expired.

Cause analysis: During PSCO inspection, the crew members were afraid that the sensor would be removed too slowly, so they removed the sensor together with the jacket as soon as they were nervous, which led to direct connection between the flue and the engine room. PSCO believed that such operation was unsafe. In addition, during the ship abandonment drill, the batteries of emergency two-way lifeboat telephones carried by the crew member were expired and the three valid main batteries in their original packages were not carried.

Lessons:

- During the PSCO inspection, the crew shall be calm, and operate carefully as required, so as to prevent deficiency or detention caused by nervousness;
- During the drill, it is necessary to simulate the real scene, participate in the drill in strict accordance with their respective responsibilities, and carry appropriate equipment and data.
- From September to November 2019, PSC authorities around the world will jointly carried out the CIC in emergency system. All companies shall strengthen emergency training and drills, to prevent deficiency and detention.

II. Typical detention cases in second half of 2018

Case 3: September 4, 2018 - Russia

Detention deficiencies: 1. BA Nautical Charts 3014, 3046, 2432 not up-dated by notices to mariners and Vladivostok coastal warnings; 2. Existing numbers of maritime safety information for Russian far-east region missing(Vladivostok coastal warning-gunnery, bombing exercise); 3. BA sailing direction 41, 42B, 42C, 43 not up-dated..

Cause analysis:

Through observation, data inquiry and communication with the crew, after analyzing and summarizing the information, it is believed that the crew of the ship changes frequently. The captain, mate and third mate are all newly promoted, and the third mate is also the second mate. In addition, the third mate just boarded the ship on July 25, failing to effectively manage and update the ship's navigation safety information and leading to deficiencies in equipment maintenance; the crew and the shipping company have not paid enough attention to these matters, resulting in the ship's detention.

Lessons:

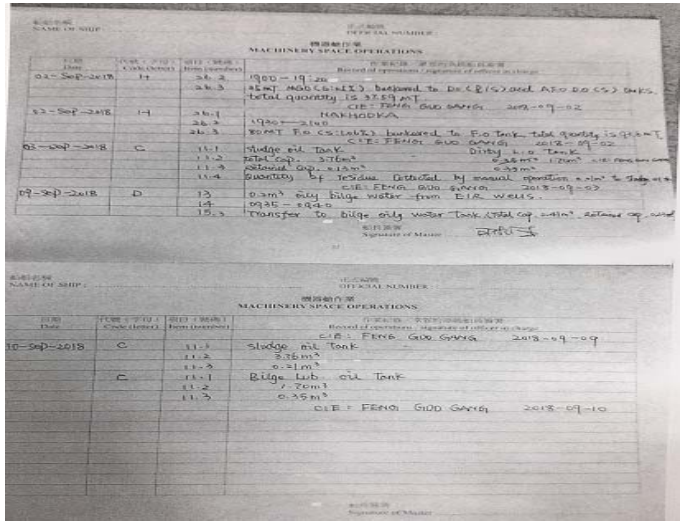
1. Crew members shall fully perform their respective duties, master the necessary navigation information, update nautical charts and publications in time, and correctly set NAVTEX according to the ship route, so as to receive navigation warning information in time;
2. The company shall organize training and provide necessary shore-based support according to the ship route and port conditions, strengthen the provision and management of ship documents and publications, ensure the accuracy and conformity of documentation, and pay special attention to timely update navigation safety information.
3. The company shall, in case of frequent crew changes, pay more attention to supervise the crew to be familiar with and perform their duties as soon as possible.

II. Typical detention cases in second half of 2018

Case 3: September 4, 2018 - Russia (continued)



Mooring rope worn seriously



ORB not recorded properly



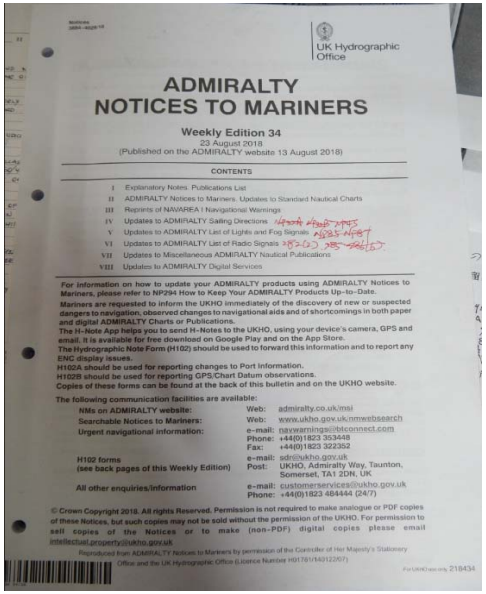
Chart not updated



NAVTEX set incorrectly

II. Typical detention cases in second half of 2018

Case 3: September 4, 2018 - Russia (continued)



UK Hydrographic Office

ADMIRALTY
NOTICES TO MARINERS

Weekly Edition 34
23 August 2018
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For information on how to update your ADMIRALTY products using ADMIRALTY Notices to Mariners, please refer to NP294 How to Keep Your ADMIRALTY Products Up-to-Date.
Mariners are requested to inform the UKHO immediately of the discovery of new or suspected dangers to navigation, observed changes to navigational aids and of shortcomings in both paper and digital ADMIRALTY Charts or Publications.
The H-Note App helps you to send H-Notes to the UKHO, using your device's camera, GPS and email. It is available for free download on Google Play and on the App Store.
The Hydrographic Note Form (H102) should be used to forward this information and to report any ENC display issues.
H102A should be used for reporting changes to Port Information.
H102B should be used for reporting GPS/Chart Datum observations.
Copies of these forms can be found at the back of this bulletin and on the UKHO website.

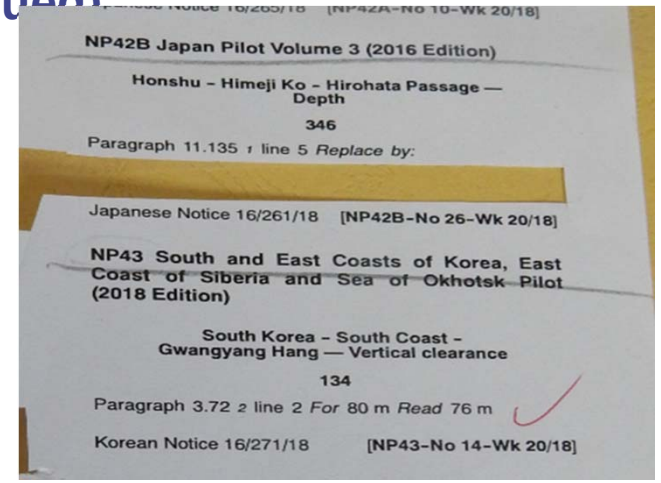
The following communication facilities are available:

NMs on ADMIRALTY website: Web: admiralty.co.uk/msi
Searchable Notices to Mariners: Web: www.ukho.gov.uk/nmwebsearch
Urgent navigational information: e-mail: navwarnings@btconnect.com, Phone: +44(0)1823 353448, Fax: +44(0)1823 322352
H102 forms (see back pages of this Weekly Edition): e-mail: sdrin@ukho.gov.uk, Post: UKHO, Admiralty Way, Taunton, Somerset, TA1 2DN, UK
All other enquiries/information: e-mail: customerservices@ukho.gov.uk, Phone: +44(0)1823 484444 (24/7)

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218434

Lack of weekly notices to marines



NP42B Japan Pilot Volume 3 (2016 Edition)

Honshu – Himeji Ko – Hirohata Passage — Depth

346

Paragraph 11.135 *1* line 5 *Replace by:*

Japanese Notice 16/261/18 [NP42B-No 26-Wk 20/18]

NP43 South and East Coasts of Korea, East Coast of Siberia and Sea of Okhotsk Pilot (2018 Edition)

South Korea – South Coast – Gwangyang Hang — Vertical clearance

134

Paragraph 3.72 *2* line 2 *For* 80 m *Read* 76 m

Korean Notice 16/271/18 [NP43-No 14-Wk 20/18]

Sailing direction not modified



Leakage traces on the top of the sewage treatment plant (repaired)



Course recorder out-of-order.

II. Typical detention cases in second half of 2018

Case 4: September 4, 2018 - Zhanjiang, China

Detention deficiencies: 1. Several closing devices of air pipe for ballast tank were defective; 2. Sprinkler of water based extinguish over incinerator malfunction; 3. Water ingress alarm system showing “system failure” & “purge failure” during inspection.

Cause analysis:

1. Due to insufficient safety inspection and maintenance, the serious corrosion of the floating plate in the vent cap resulted in the failure of some air pipes in the ballast tanks. After the crew expanded the scope of inspection, the damaged air pipe heads had been replaced.
2. The sprinkler of water based extinguish system over the incinerator failed to start spraying manually and automatically, which is due to lack of safety inspection and failure to find equipment defects in time. After the repair for the sprinkler of water based extinguish system in engine room, the situation returned to normal.
3. Compressed air is required for the operation of the water ingress alarm system, but the crew was not familiar with the operation of the system and failed to supply compressed air to the system during the test, triggering the fault alarm. After being familiar with the operation, the crew supplied compressed air to the water ingress alarm system, eliminating the fault and ensuring the normal test.

Lessons:

1. The crew members shall strengthen the inspection and maintenance of the ship's key equipment, and timely handle the problem found; they shall report to the company and classification society when failing to solve the problem by themselves;
2. The crew members shall be familiar with the operation and testing of all key equipment on board, and undergo the safety operation training;
3. The company shall closely supervise the safety management and maintenance of ships, to prevent PSC deficiencies and detention.

II. Typical detention cases in second half of 2018

Case 4: September 4, 2018 - Zhanjiang, China (continued)



Air pipe head seriously rusted



No explosionproof interphone for firemen provided



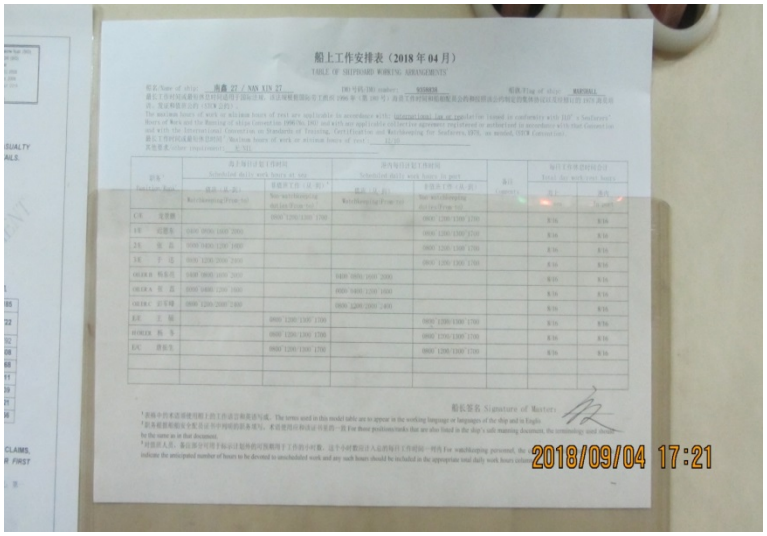
No safety depth set by the crew on the main electronic chart



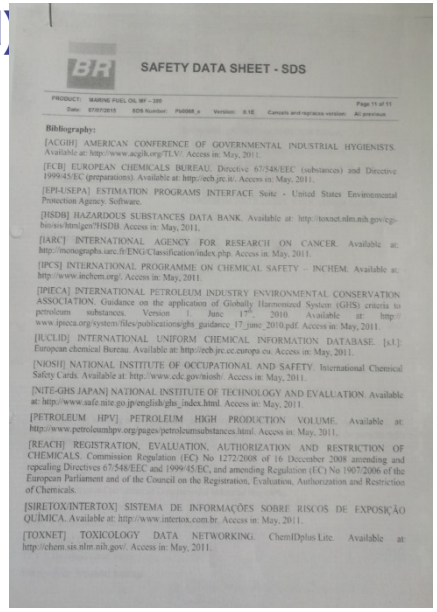
Incinerator ignition failure

II. Typical detention cases in second half of 2018

Case 4: September 4, 2018 - Zhanjiang, China (continued)



Watch duty list not updated timley



Material safety data sheet (MSDS) of oil product not reserved after the refueling



Paint coverage on return pipe of sewage treatment plant



Life raft bond incorrectly

II. Typical detention cases in second half of 2018

Case 4: September 4, 2018 - Zhanjiang, China (continued)



Fault alarm from fire detection system



Sprinkler of water based extinguish over incinerator malfunction



Water ingress alarm system failure



Some fire detector failed

II. Typical detention cases in second half of 2018

Case 5: September 7, 2018 - Indonesia

Detention deficiencies: 1. Untreated sewage discharged directly to OVB when along side at Panjang port; 2. Sewage treatment plant defective, rusty and holed; 3. OWS fdefective; 4. The Emergency fire pump defective; 5. Lifeboat engine defective.

Other deficiencies: In addition to above 5 detention deficiencies, the ship was involved in other 22 deficiencies, including one SMS deficiency; evidence concerned showed that the ship safety management is unsatisfactory.

Investigation:

1. The company and the crew failed to fully understand the requirements of PSCO and to persuade PSCO to cancel the detention through negotiation;
2. After the ship detention, the personnel concerned failed to report to CCS in time according to the requirements of CCS, and reported to CCS after 4 days of detention, greatly affecting the sail schedule;
3. From the perspective of ship deficiencies, the safety management and maintenance of the ship and the supervision of the company are seriously insufficient.

Lessons:

1. After the ship detention, the shipowner or company shall timely report to CCS as per the specifications of classification society, otherwise the ship class may be suspended;
2. The requirements of the safety management system shall be followed strictly and ship safety inspection test and maintenance shall be completed;
3. The company shall fully provide shore-based support and closely supervise and inspect, to prevent deficiencies and detention.

II. Typical detention cases in second half of 2018

Case 5: September 7, 2018 - Indonesia (continued)



No Security tips posted at the gangway



Loadline mark rusted (rectified)



Failure in self-closing device of fire door



Sewage treatment plant directly discharged to the outboard (the valve for discharging outboard in the port is not closed)

II. Typical detention cases in second half of 2018

Case 5: September 7, 2018 - Indonesia (continued)



Missing insulation pad under the electrical control box



Water leakage in seawater cooling pipe of auxiliary engine



Air leakage in exhaust pipe of auxiliary engine



Failure in air-starting control valve of auxiliary engine

II. Typical detention cases in second half of 2018

Case 5: September 7, 2018 - Indonesia (continued)



Heavy oil pollution on top of boiler's hot water tank

Failure in pressure gauge of boiler water pump





Low-temperature cooling water pump pressure gauge failed

Water leakage in seawater pipe



II. Typical detention cases in second half of 2018

Case 5: September 7, 2018 - Indonesia (continued)



Ballast pump fault



Dirty, greasy and slippery engine room floor



Some lamps in engine room not working



Failure in motor of pump of OWS

II. Typical detention cases in second half of 2018

Case 5: September 7, 2018 - Indonesia (continued)



Unclassified garbage in engine room



Damaged air vent gasket in emergency generator room



Emergency fire pump fault



Failure of lifeboat capstan

II. Typical detention cases in second half of 2018

Case 6: September 9, 2018 - Iran

Detention deficiencies:

1. X-band radar(port side) is not working;

2. (Port & Stbd.) L/B engines unable to be start.

Investigation:

1. During the repair of the damaged No.1 auxiliary engine in Iran, there was a conflict between the crew and the repairman, resulting in the detention of PSCO inspection;

2. In case of equipment failure, no report was sent to the flag state or classification society and the local PSC. After being discovered by PSC, some defects were forced to be eliminated locally. Due to the lack of spare parts, the radar and No.1 auxiliary engine were repaired at the next port through the exemption agreement of the flag state and the classification society;

3. Deficiency in ship safety inspection test results in low power for the battery of lifeboat engine and the inability to start the lifeboat engine.

Lessons:

1. The damage of important equipment shall be reported to the flag state, classification society and local PSC in a timely manner. Otherwise, in addition to the detention of PSC, the ship's class may be suspended;

3. The requirements of the safety management system shall be followed strictly and ship safety inspection test and maintenance shall be completed.

II. Typical detention cases in second half of 2018

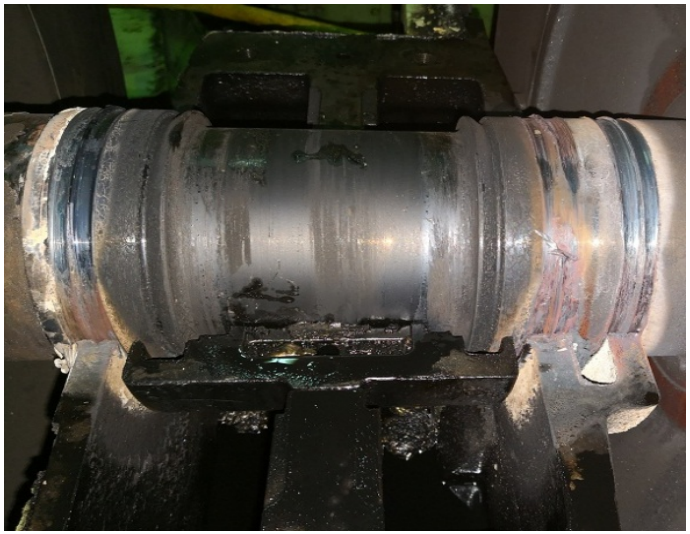
Case 6: September 9, 2018 - Iran (continued)



Radar damaged



Low battery power, causing inability to start lifeboat engine



Auxiliary engine crankshaft damaged



Failure of cargo hold flooding alarm

II. Typical detention cases in second half of 2018

Case 7: October 20, 2018 - Sweden

Detention deficiencies: 1、Quick closing valves loop3, four (4) valves inoperative: HFO settle x 2, HFO Service x 2; 2、Quick closing valves loop 4, one (1) valves inoperative: LS Cylinder LO Tank； 3、Emergency generator - second starting device inoperative；4、 Emergency generator - inoperative (during normal start)；5、Freefall lifeboat- Multiple seatbelts not properly attached. (great risk of injuries of crew if lifeboat is released and crew not properly secured in seats) - Multiple loose bolts and missing nut (attachment plate to release hook)；6、Legionella bacteria found in drinking water analyze, Immingham UK. The company could not present a new report stating that the problem is solved during the PSC inspection.

Investigation:

1. There are many MLC deficiencies such as the overdue service time and poor ship condition. Since MLC certificates were not issued by the classification society, other classification societies carried out additional MLC inspections on the ship.
2. On July 19, 2018, PSC of Immingham in Britain found that legionella in the drinking water on the ship exceeded the standard. During this PSC inspection, the ship failed to provide evidence that the problem had been solved, resulting in detention deficiencies.
3. In view of the deficiencies, the ship's safety inspection test and maintenance were seriously insufficient, and the defect was failed to be detected and eliminated in time, resulting in detention.

Lessons:

1. The inspection of MLC in various countries is more and more strict. Generally, many MLC deficiencies or the discovery of serious deficiencies (such as back pay) will lead to detention, and additional MLC inspection or SMC audit are required.
2. All PSC deficiencies shall be eliminated as soon as possible and sufficient evidence shall be preserved. In case of no proper reason or inability to provide evidence of defect correction, defects will generally escalate, leading to ship detention;
3. The requirements of the safety management system shall be followed strictly and ship safety inspection test and maintenance shall be completed.

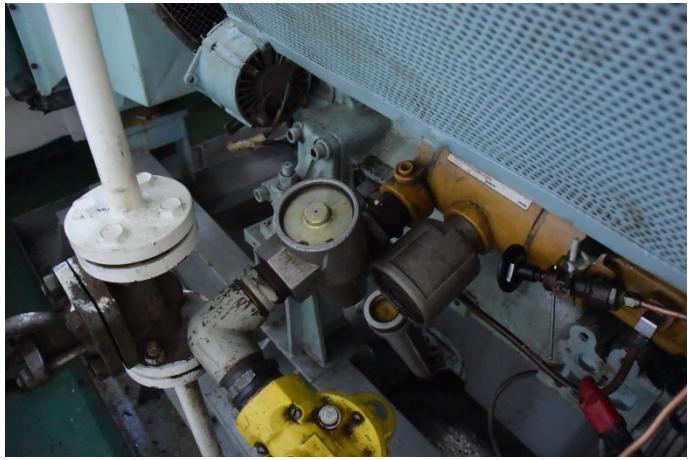
II. Typical detention cases in second half of 2018

Case 7: October 20, 2018 - Sweden (continued)



Several quick closing valves of oil tank in engine room not working

Failure in pneumatic motor of emergency generator





Loose checkered iron plate in engine room

Dirty kitchen (after cleaning)

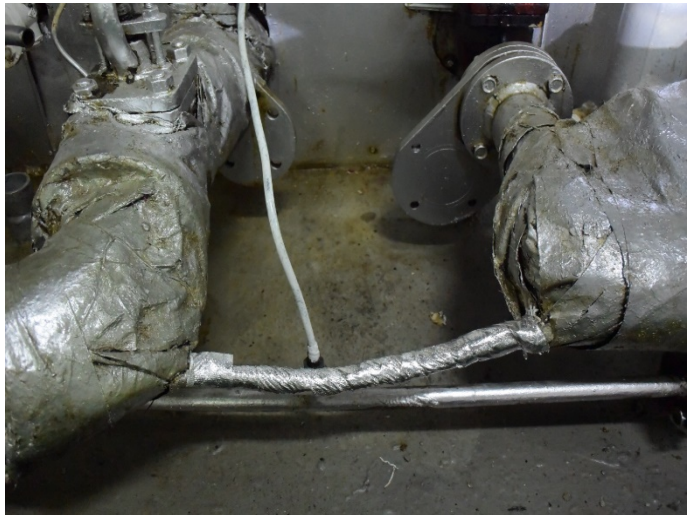


II. Typical detention cases in second half of 2018

Case 7: October 20, 2018 - Sweden (continued)



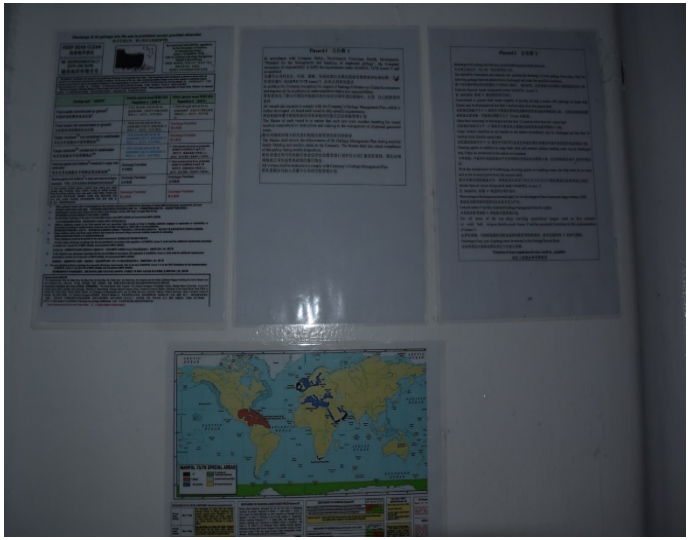
Untidy crew cabin



Missing heat insulation cover of tracing pipe



Cold storage thermometer damaged (replaced)



Re-posted garbage bulletin board

II. Typical detention cases in second half of 2018

Case 8: November 19, 2018 - South Korea

Detention deficiencies: 1. Emergency Generator engine not properly operated: --Hunting of engine RPM serious (1120~1130RPM) at idle; --Fuel oil supply valve not worked and fuel oil not supplied; --Crew not familiar with power recovery under black out.; 2. Fixed local application fire extinguishing system not properly operated and readily available: --solenoid valve for protected area not worked; --crew not familiar with operation seriously.

Investigation:

1. On November 13, 2018, the shipping company changed nearly half of its crew in China. The changed crew were unfamiliar with the ship systems and equipment and lacked sufficient training in the operation of various key equipment;

2. The shipping company failed to provide sufficient shore-based support and to supply the relevant materials and equipment in time according to the ship demands;

3. The ship had deficiencies in safety inspection and maintenance of equipment.

Lessons:

1. After replacing the crew, the company shall strengthen and complete necessary business and emergency training as soon as possible, and shall try its best to avoid replacing a large number of crew members at one time;

2. The crew members shall be fully perform safety inspection and maintenance work in accordance with their respective responsibilities;

3. The company shall provide sufficient shore-based support for ships and timely supply spare parts and materials. If the company fails to solve the problem of key equipment timely, it shall strictly implement the safety management system and report to the interested party, such as flag state, classification society and PSC, etc., so as to obtain exemption or understanding and avoid the ship detention.

II. Typical detention cases in second half of 2018

Case 8: November 19, 2018 - South Korea (continued)



Cargo hold smoke detection system failed

Failure in quick closing valve of oil tank in emergency generator





Failure of cargo hold flooding alarm

Failure of local water mist fire fighting system



II. Typical detention cases in second half of 2018

Case 9: 28 November 2018 - AMSA

Detention deficiencies: Seafarer's (2 AB and one oiler) repeatedly not paid wages in accordance with their Seafarer's Employment Agreement.

Investigation:

1. During PSC inspection, the inspector made individual inquiries with the three Burmese crew members on board, learning that the three crew members have been working on board for nearly 7 months and they claimed that they had not be paid at the account stipulated in the contract. On this basis, PSC announced to detain the ship.
2. The shipowner argued that the wages of the foreign crew members were paid in full to their agent company by contract, which transferred the wages to their accounts after deducting a portion of the contract deposit. After the ship detention, the shipping company immediately paid the insufficient part of the crew's wages with cash. At the same time, the company, upon the requests of the three crew members, arranged for their repatriation in the port.
3. The company had drawn up a deficiency rectification plan, and AMSA signed the release order after satisfactorily confirming the preventive and corrective measures submitted by the company.

Lessons:

1. The shipowner claimed that the salary of the foreign crew members was paid to their agent company and did not know whether they received the full contract salary.
2. The company has made a correction plan, to directly pay the crew wages according to the employment agreement in the future.
3. The responsible personnel of the company shall undergo special training, to fully understand and fulfill the requirements of MLC.

III. Information on PSC

CCS Notice on Strengthening Inspection of Shipowner Employment Agreements, Wages and Ship Complaint Procedures:

Recently, PSC detention caused by deficiencies such as crew salaries has not only affected the normal operation of ships, but also imposed great pressure on flag states, authorized organizations and interested parties. Therefore, it is emphasized that:

- **Requirements for shipowners and ships shall be met**
- **All national laws and regulations, relevant provisions and rules stipulated in DMLC PART I shall be strictly followed.**
- **The minimum wage for sailors shall meet the requirements of national laws and applicable CBA, and two-face agreements and false contracts are prohibitted.**
- **The employer shall conclude a labor contract with the sailor in a timely manner after its employment (applicable to Chinese sailors).**
- **The signed agreement shall be strictly performed, and full monthly wages shall be paid to sailors in accordance with the provisions of the Convention; relevant payoff records shall be saved and the monthly salary sheet shall be also preserved by sailors. The above documents shall be signed by sailors.**
- **The overtime hours shall be recorded carefully; the overtime records shall be signed by sailors and overtime wages (including interns) shall be paid according to regulations concerned.**
- **The shipowner and shipping company shall strengthen the study and application of ship complaint procedures, enhance communication, and strive to resolve complaints at a lower level, and properly handle sailors' complaints to the outside, thus avoiding adverse effects.**

III. Information on PSC

CCS Notice on Strengthening Inspection of Shipowner Employment Agreements, Wages and Ship Complaint Procedures (Continued)

- ◆ Close attention to shall be paid to major deficiencies and non-conformance types.
- DMLC Part I is not in the latest version.
- Dual agreements or false contracts are used.
- The employer concludes no labor contract with the sailor after its employment.
- The signed agreements are failed to be performed, such as failure to pay sailors full monthly wages in accordance with the provisions of the Convention;
- No payoff record is kept, the actual overtime records are not included in monthly payroll records, no monthly salary sheet is
- provided to the sailor, and all above documents are not signed by the sailor.
- False payoff records, such as forged bank transfer statement, are provided.
- No overtime wage is paid as required.
- Sailors are unfamiliar with the ship complaint procedurea, and their complaints are not been properly handled.

III. Information on PSC

On the remuneration of ship interns:

- **Recently, the competent authority of Marshall issued No. 27-18 Maritime Safety Announcement. It pointed out that PSC officers (mostly in Belgium) have identified many deficiencies in the working hours of interns on board. Accordingto No. 2-011-33 Marshall Maritime Notice, interns are also crew members and they has the rights to reach a crew employment agreement or training agreement. However, in many training agreements, only the total monthly salary of interns is stipulated and overtime payment, unlike the standard crew employment agreement, is not included, which means interns only work during normal working hours (8 hours per day). But the competent authority found that interns works overtime seriously during flag state inspection, and PSC also found the same problem during the inspection, and issued a Code 17 deficiencies and required interns to be paid overtime wages. The competent authority suggested that interns shall either conclude a standard crew employment agreement or require to add the overtime content to the training agreement. In addition, the ship documents and records shall meet the provisions on overtime in the agreement.**
- **Considering the intern explanation on the ILO website and the fact that many flag countries have also specified that MLC and 2006 Convention are applicable to interns, the above requirements are consequently applied to all flag ships served by CCS. In case of above-mentioned problems, it is deemed as the common deficiencies, and its corrective measures shall include the agreement amendment (if necessary) and back pay for overtime, etc. The measures mentioned shall be taken before the issuance/signing of the certificate, and the evidence of other preventive and corrective measures can be submitted within three months. In case of failure to complete the above matters before the sailing, the certificate will lose efficacy.**

IV. Suggestions on PSC work

- A good ship appearance will give PSCO a favorable first impression and reduce the risk of detention. From the perspective of the deficiencies around the whole year, there are many MLC deficiencies, mainly involving poor sanitary environment of ships, damaged living facilities, danger in working environment and insufficient remuneration of crew members. These problems are often linked to SMS, making PSCO believe that the ship safety management fails to meet the requirements and the ship shall be detained, especially ships sailing in Australia, Europe and the United States. It is suggested that all companies and shipowner shall pay close attention to ship maintenance, keep the working/living facilities intact, the environment safe and tidy, so as to reduce the deficiencies and detention in MLC Convention.
- Crew wages shall be paid fully and timely. The current situation in the shipping market has led to the poor management of some companies. As for the crew's wages, they cannot be paid in full and on time. Once the port state receives the complaints about the crew wages, it will inevitably lead to the occurrence of ship detention, significantly and adversely affecting the shipping company. Therefore, the company shall pay enough attention to the payment of crew's wages, to ensure the rights of sailors are protected.
- Countries around the world pay special attention to pollution prevention. There are more and more areas restricting sulfur content in fuel oil. Some countries or regions have set up specialized agencies and assigned personnel to sample and test fuel oil or domestic sewage from ships arriving at the port. If problems or hidden dangers are found, PSC will undoubtedly detain the ship. Relevant companies and shipowners shall note the matters mentioned and make full preparations.

IV. Suggestions on PSC work

- Detention caused by deficiencies in lifeboats, emergency generators, air funnels, vent pipes, fixed water spray fire extinguishing systems in engine room, quick-closing valves and anti-pollution equipment is still relatively prominent. Therefore, the shipping company shall strictly supervise the crew to carry out the maintenance of key equipment and strengthen their inspection and testing, to ensure the crew to operate and use the key equipment skillfully, to do a good job in their inspection before arrival, and to reduce the deficiencies and detention.
- According to 2019 Tokyo MoU and Paris MoU, the centralized inspection (CIC) will be jointly carried out for the ship emergency system. Shipping companies shall actively make preparations, closely supervise the crew, and carry out training in emergency systems, various emergency drills (especially fire fighting and ship abandonment drills), emergency equipment operation and testing, to prevent relevant deficiencies or detention.
- Some ships are criticized even detained by PSC due to the crew's bad living and working habits. For example, fire doors are opened, measuring holes in cabins are normally opened, the closing action of quick-closing valves is restricted, oily wastes and domestic garbage are discarded at will, wires are pulled privately, marine electrical equipment is not used, emergency equipment switches are not set in the automatic position and domestic sewage outlet valves are not closed when in the harbor, etc. It is suggested that the company shall strengthen publicity and urge the crew to cultivate good working and living habits, so as to reduce relevant deficiencies or detention.

Thanks for your vigorous support to CCS.

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