

The Second Safety Meeting of Shipowner/ Ship  
Management Company, 2018

# PSC Session

CCS Headquarters  
August 2018

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## General Status of PSC Inspections of CCS Ships during 2015-2017



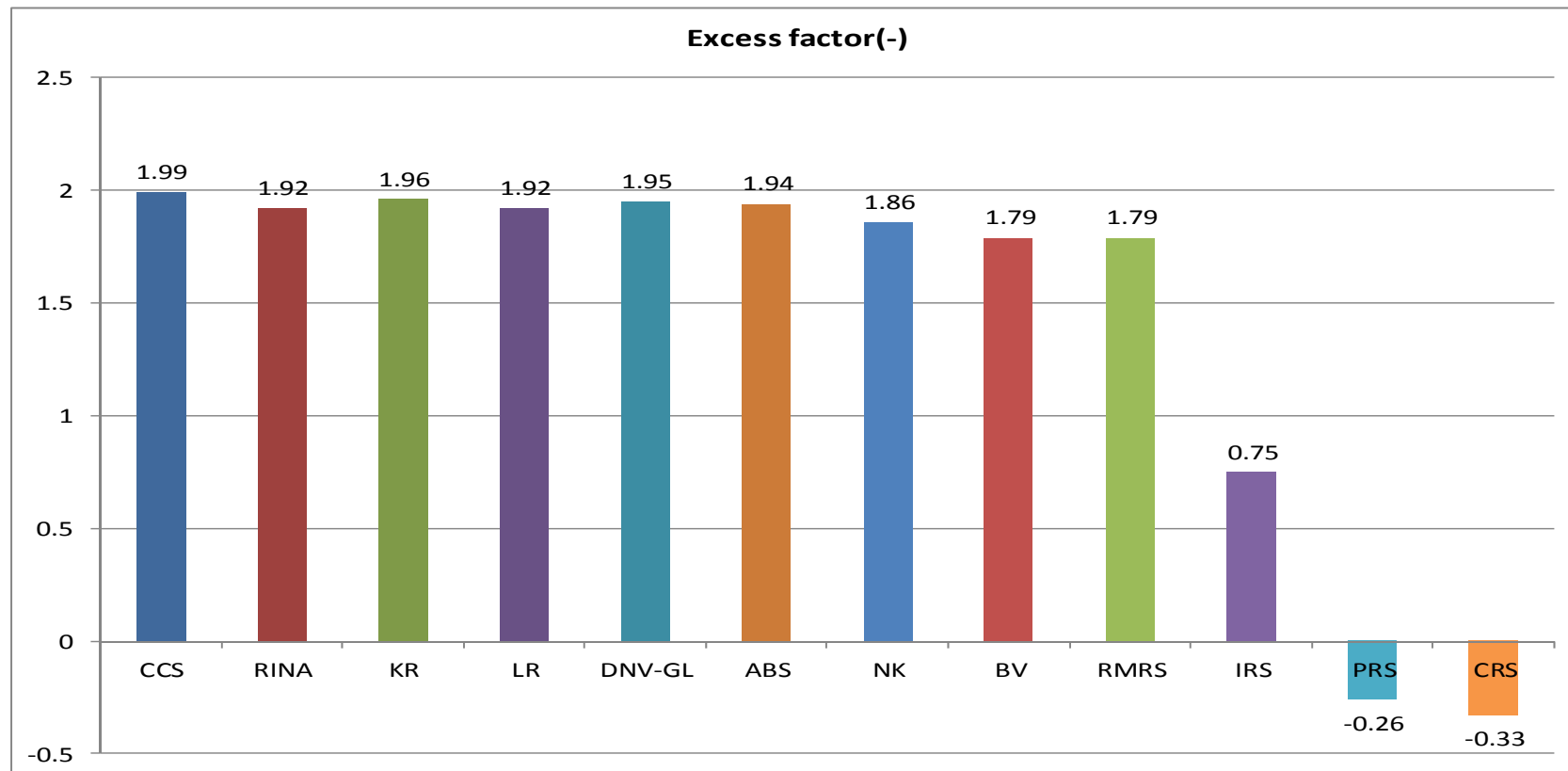
### 1. General Status:

- ◆ **TOKYO MOU:** A total of 7,595 inspections were carried onboard CCS ships, among which 59 were detained, with a detention rate of **0.78%**;
- ◆ **PARIS MOU:** A total of 834 inspections carried onboard CCS ships, among which 17 were detained, with a detention rate of 2.04%;
- ◆ **USCG:** Approximately 659 inspections carried onboard CCS ships, among which 3 was detained, with a detention rate of 0.46%.
- ◆ In summary, a total of 9,088 CCS ships were inspected in the PSC inspections carried out by TOKYO MOU, PARIS MOU and USCG during 3 years, among which 79 were detained, with a detention rate of 0.8796%, which is better than the 0.96% during 2014-2016. The overall performance of CCS ships witnessed a rise.
- ◆ Grateful to shipping companies for the above-mentioned achievement that benefited from the consistent support and effort and good management.

# General Status of PSC Inspections during 2015-2017



Comparison of PSC evaluation value of TOKYO MOU, IACS member during  
(figures from TOKYO MOU 2017 Annual Report)

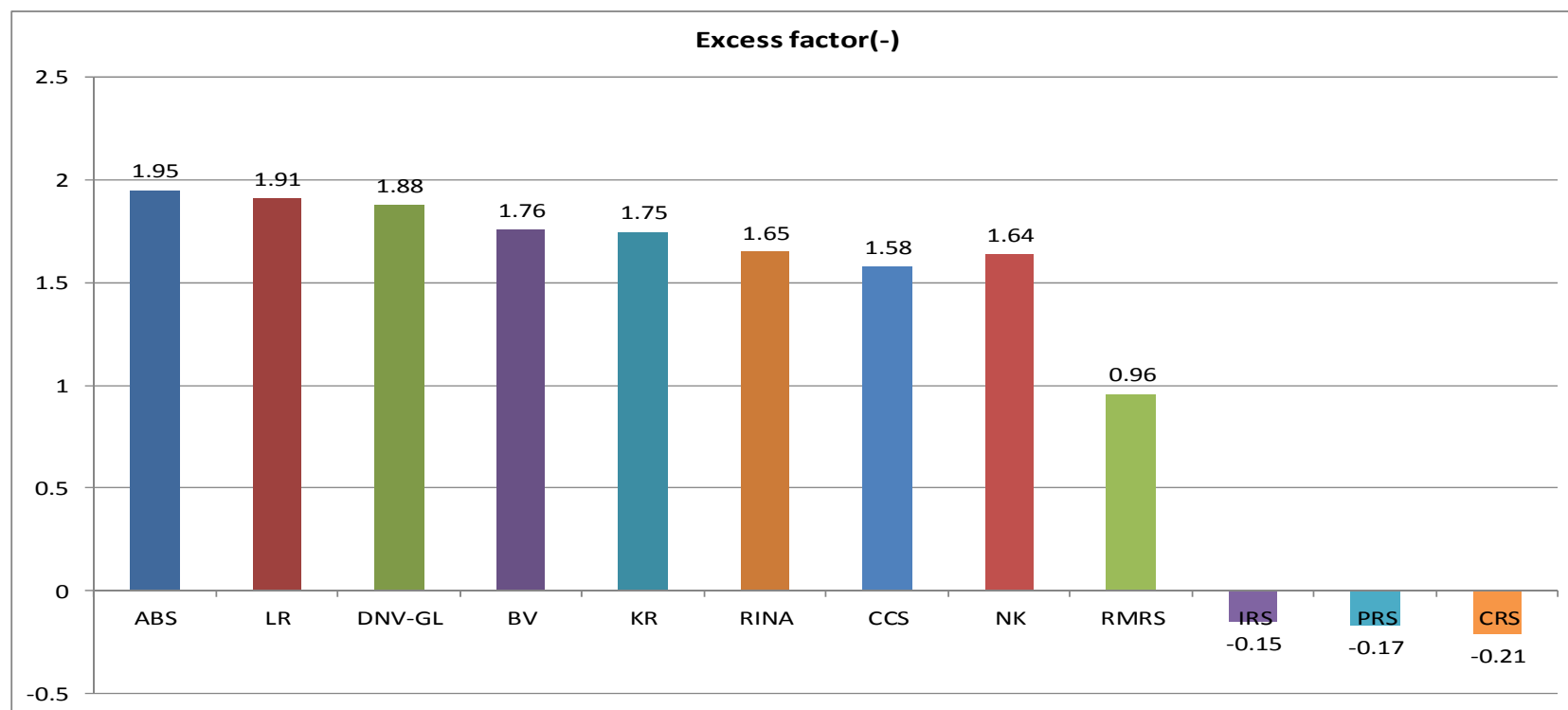


The performance of CCS ships in PSC of TOKYO MOU ranked higher than other ROs.

# General Status of PSC Inspections during 2015-2017



Comparison of PSC evaluation value of PARIS MOU, IACS member during  
(figures from PARIS MOU 2017 Annual Report)



Influenced by the responsibility detention once happened at PARIS MOU in 2015,  
the performance of CCS ships in PSC of PARIS MOU ranked lower than other ROs.  
CCS rank would rise up obviously if no CCS-related detention happen in 2018.

# General Status of PSC Inspections during 2015-2017



## Comparison of performance of USCG PSC (figures from USCG 2017 Annual Report)

| RO     | YEARS AND INSPECTIONS |      |      |       | 2015-2017<br>RO-RELATED<br>DETAINTION | RO-RELATED<br>DETAINTION RATIO |
|--------|-----------------------|------|------|-------|---------------------------------------|--------------------------------|
|        | 2015                  | 2016 | 2017 | Total |                                       |                                |
| ABS    | 1677                  | 1836 | 1685 | 5198  | 1                                     | 0.02%                          |
| BV     | 1038                  | 1113 | 1166 | 3317  | 2                                     | 0.06%                          |
| CCS    | 234                   | 231  | 194  | 659   | 0                                     | 0.00%                          |
| CRS    | 17                    | 17   | 14   | 48    | 0                                     | 0.00%                          |
| DNV-GL | 2687                  | 2122 | 3271 | 8080  | 1                                     | 0.01%                          |
| IRS    | 13                    | 13   | 13   | 39    | 0                                     | 0.00%                          |
| KR     | 287                   | 242  | 314  | 843   | 0                                     | 0.00%                          |
| LR     | 2143                  | 2403 | 2405 | 6951  | 1                                     | 0.01%                          |
| NK     | 2203                  | 2296 | 2282 | 6781  | 0                                     | 0.00%                          |
| PRS    | 22                    | 17   | 22   | 61    | 0                                     | 0.00%                          |
| RINA   | 355                   | 284  | 320  | 923   | 0                                     | 0.00%                          |
| RMRS   | 43                    | 34   | 29   | 106   | 0                                     | 0.00%                          |

CCS kept “0” ro-related detention in USCG PSC many.

## Analysis of PSC of CCS ships in the first half of 2018



### General Status:

- ◆ **TOKYO MOU:** A total of 1,311 inspections were carried onboard CCS ships, among which 8 were detained, with a detention rate of **0.61%**;
- ◆ **PARIS MOU:** A total of 122 inspections carried onboard CCS ships, among which 3 were detained, with a detention rate of 2.46%;
- ◆ **USCG:** Approximately 140 inspections carried onboard CCS ships, among which 0 was detained, with a detention rate of 0%.
- ◆ **Other areas:** no detention report was received.

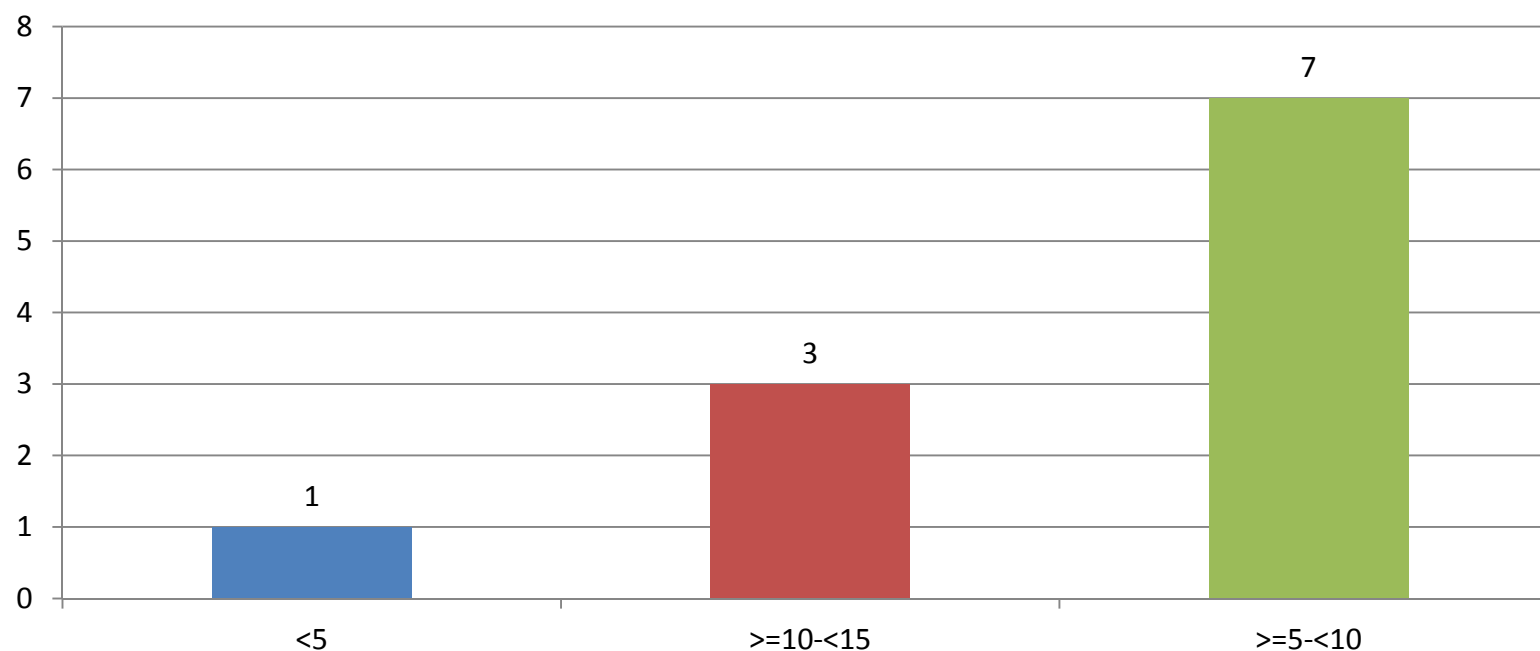
The marine industry is still experiencing a market downturn in recent years. With the intensity of PSC inspection increased, especially the CIC of MARPOL Annex VI during September to November this year, we were faced with high risk of PSC detention. We hope all companies keep highlighted alertness, take active measures, and be fully prepared and conduct self-inspection, especially with the document and record, etc., in order to avoid deficiencies or detention during CIC.

Remarks: inspection figures above from website, detention figure was reported by PSC.

# Analysis of PSC of CCS ships in the first half of 2018



## Distribution of detained ships by age



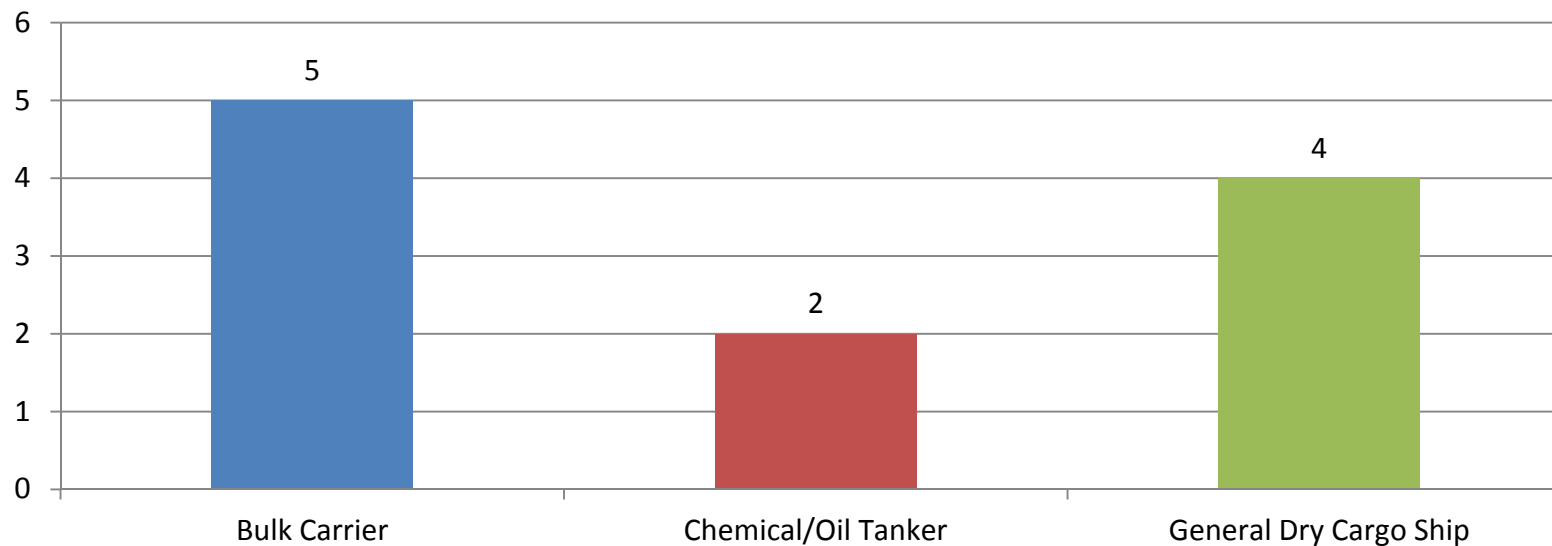
**Ships at the ages of 5-10 occupied 64% of detained ship, and most of which were bulk carriers built during 2009-2012. Companies shall strengthen the management and maintenance of this type of ships in order to decrease detention.**



# Analysis of PSC of CCS ships in the first half of 2018



## Distribution of detained ships by ship's types

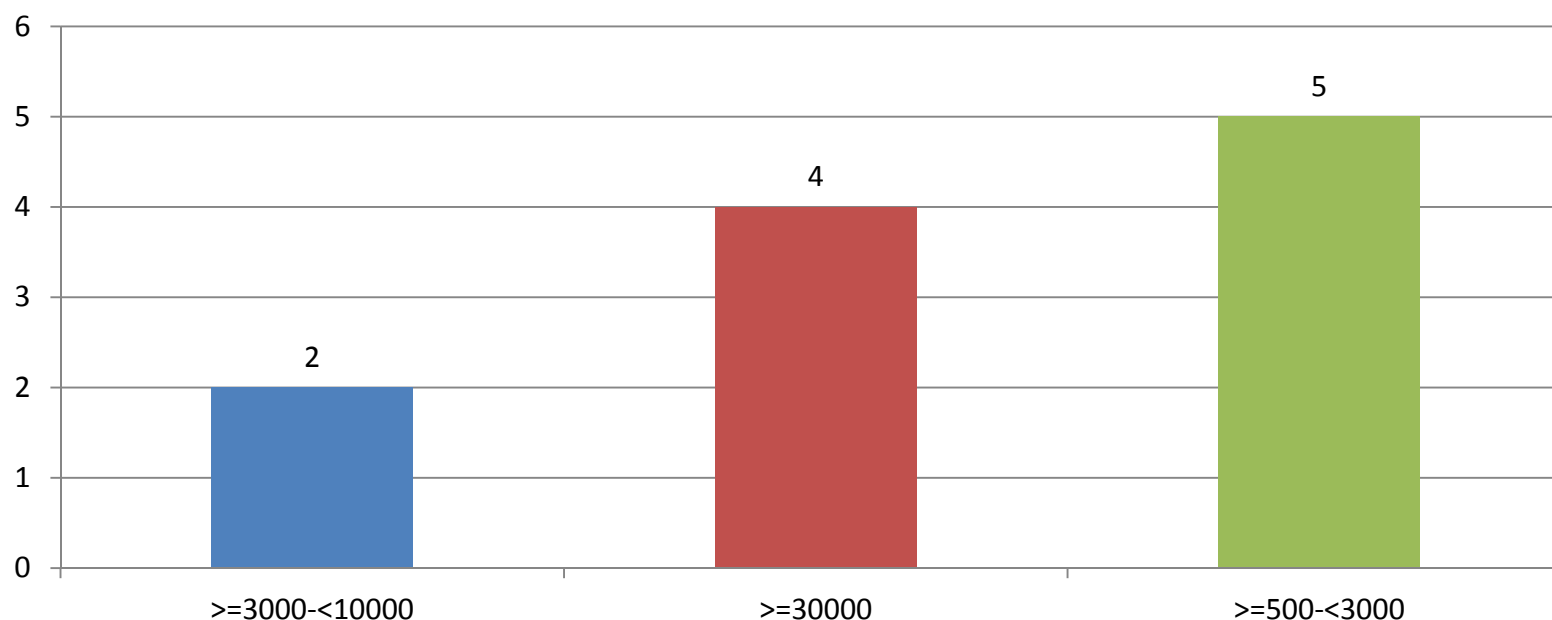


Bulk Carriers and General Dry Cargo Ships occupied the most of detained ships, exceeding 80%; especially ships sailed to Australia, Japan, and Korea. In addition, 2 oil/chemical tankers detained. We recommend all companies to strengthen the safety inspection and supervision on these ships.

# Analysis of PSC of CCS ships in the first half of 2018



## Statistics of detained ships by gross tonnage

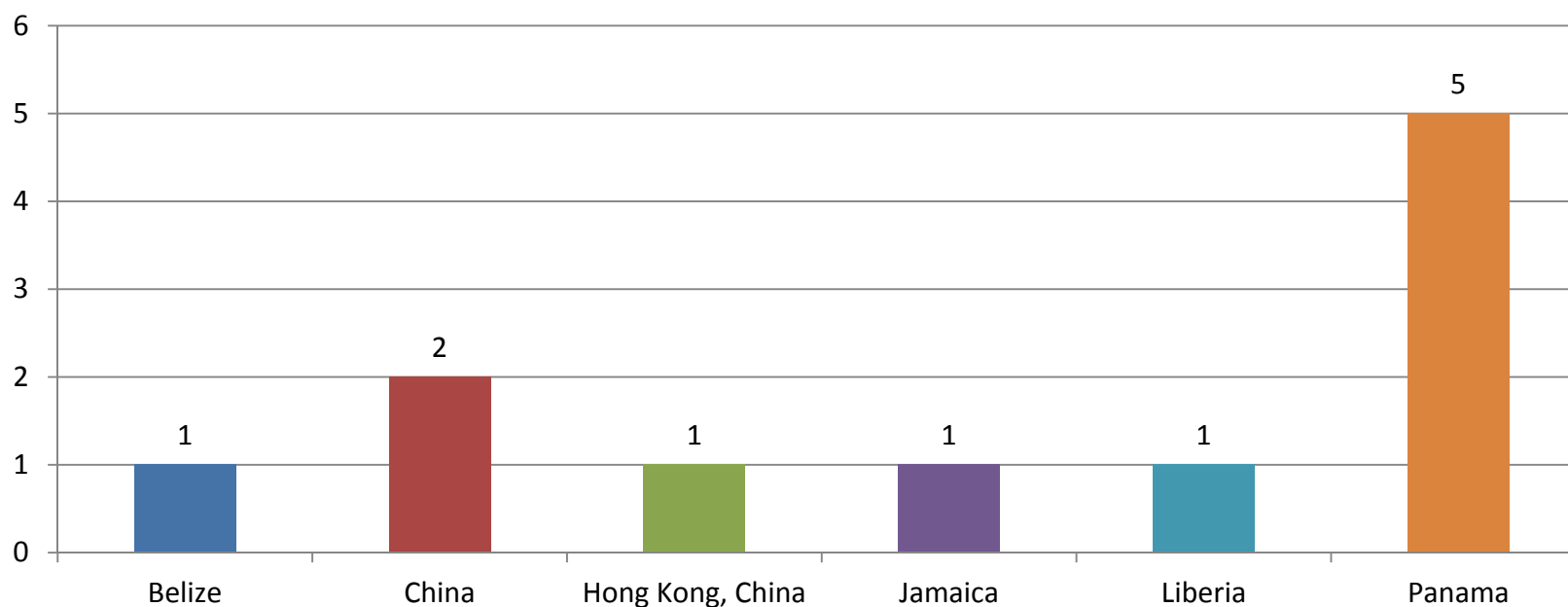


Medium/small-size ships of 500-3000 GT occupied 45% of detentions, especially small size bulk carriers sailed to Japan and Korea; and in addition, larger cargo ships faced with a increase in detention. All companies shall pay attention to strengthen the inspections on ships' emergency drill, emergency equipment, and MLC, in order to decrease deficiencies and avoid detention.

# Analysis of PSC of CCS ships in the first half of 2018



## Statistics of detained ships by flags

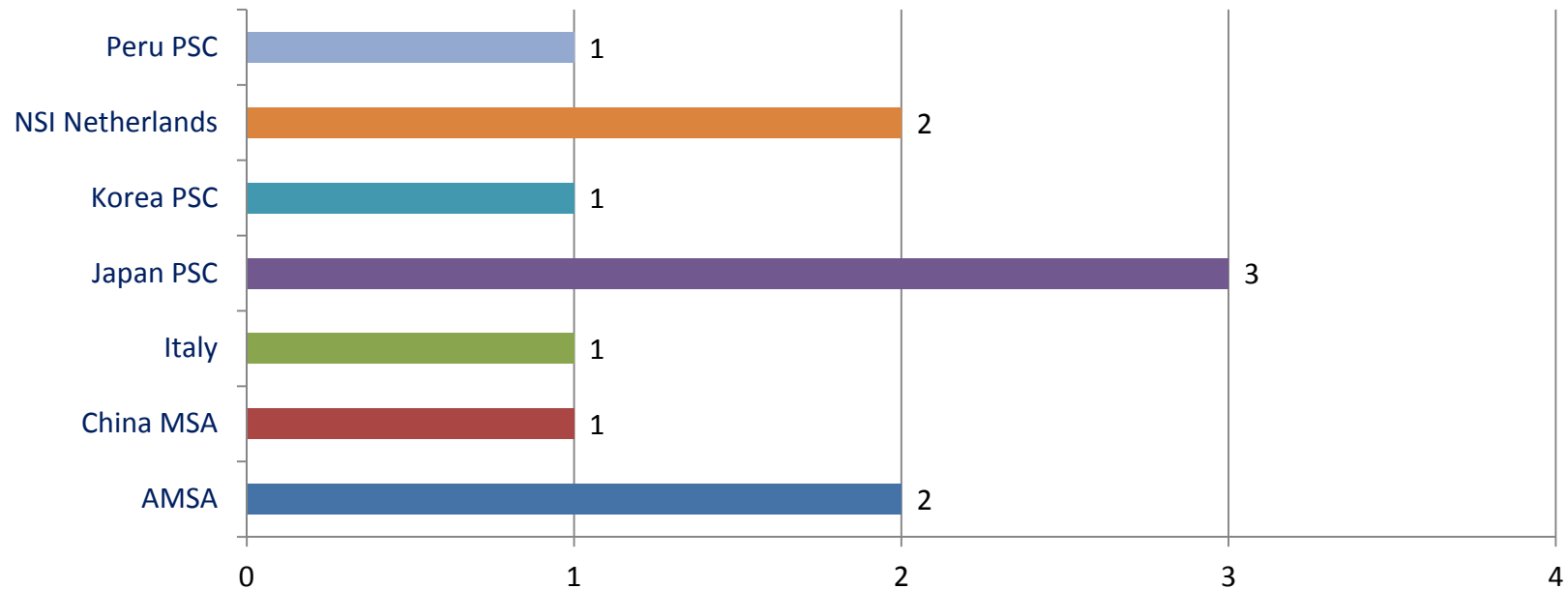


Panama flag ships faced with more detentions, occupied 45%. All companies shall try the best to avoid any ship detention.

# Analysis of PSC of CCS ships in the first half of 2018



## Distribution of detentions by country/region

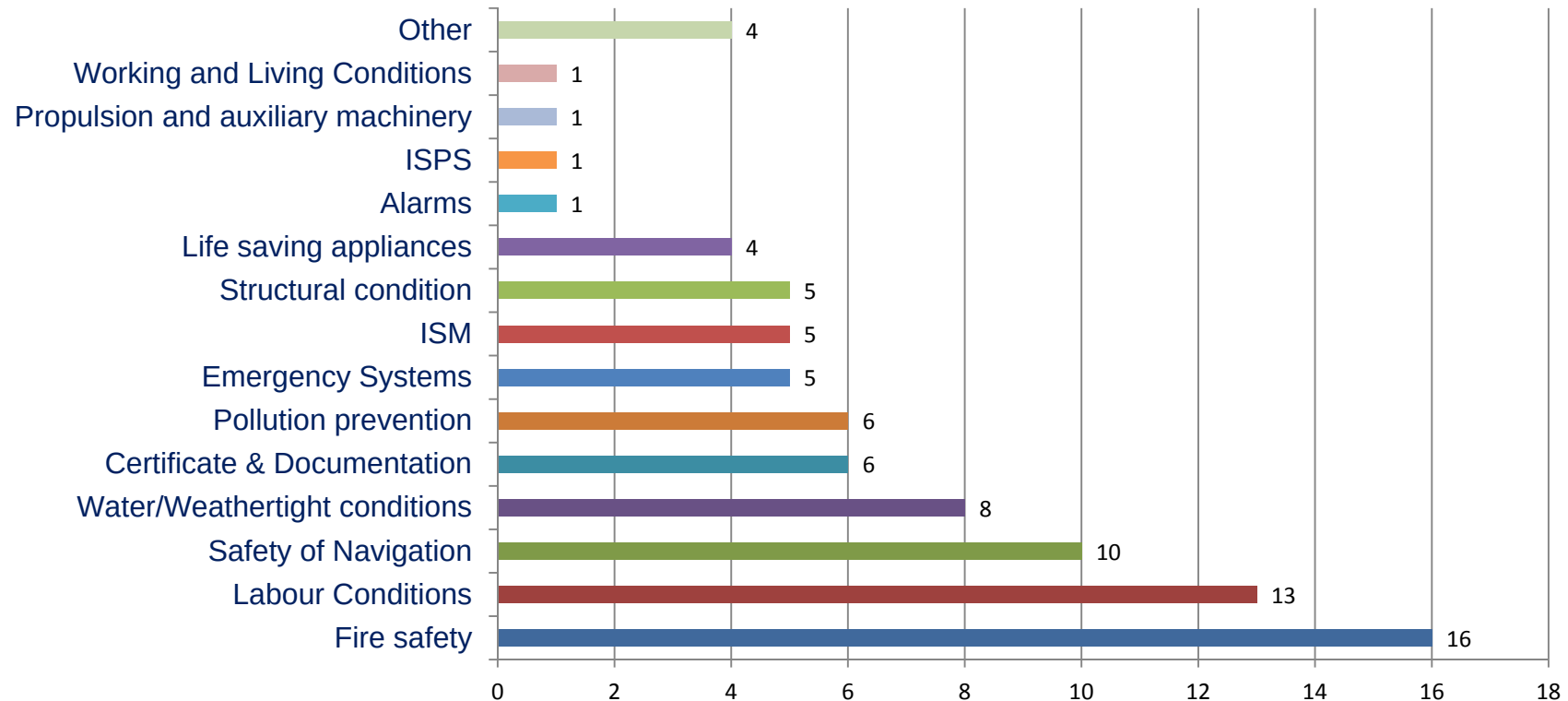


More detentions occurred in Australia, Japan, and Netherlands. Ships sailing to Europe faced with high risk of PSC detentions. All companies shall strengthen the management to ships sailing to Australia, Japan, Korea and to European countries, supervise all crew members to carry out inspections and tests related to emergency/important equipment before port arrival, and fully prepare/practice drill plan, in order to avoid deficiencies and detentions.

# Analysis of PSC of CCS ships in the first half of 2018



## Distribution of all deficiencies



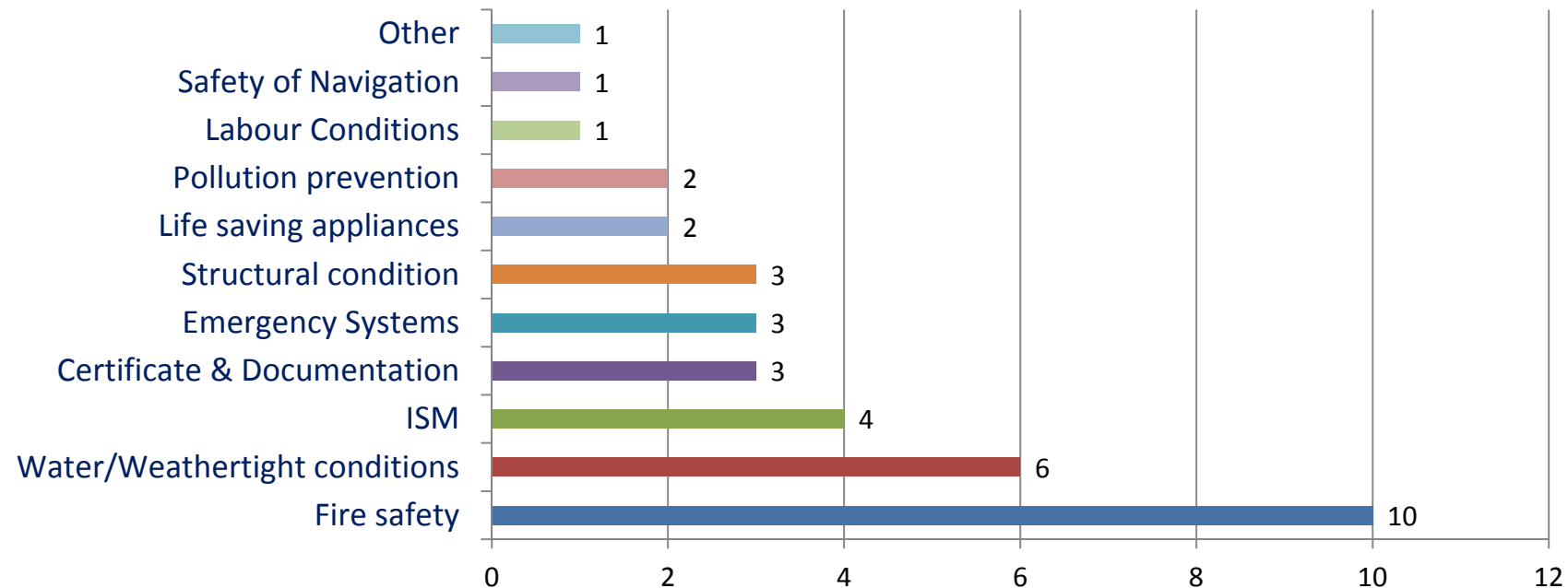
Total 86 deficiencies were proposed by PSC in the first half of 2018, mainly included fire safety, labor condition, safety of navigation, and water/weathertight condition, etc.

CIC is to be carried out according to the MARPOL Annex VI by PSC organizations jointly in a worldwide range from September to November this year, therefore the deficiencies and detentions recorded in relevant document might experience a rise.

# Analysis of PSC of CCS ships in the first half of 2018



## Distribution of all detainable deficiencies



Total 36 detainable deficiencies were proposed by PSC in the first half of 2018, mainly included fire safety, water/weathertight condition, and ISM etc. Among European PSC inspections, lots of deficiencies that are related to ISM led to detentions.

In addition, with the deepening of MLC-2006 inspections, some ships might be detained due to severe deficiencies or complains related to MLC-2006, especially those sailing to Australia, and European and American countries/regions.

It is recommended to try our best to decrease deficiencies, and avoid detentions due to large amount of deficiencies which considered to be invalid SMS by PSCO.

## Case study on detentions – Jan. 15, 2018 , Netherlands



- **Deficiencies for detention:** 1. Several closing devices/plugs on main deck are not able to be closed. 2. Fuel oil vent heads on open deck substandard. 3. Quick closing valves not working. 4. Local water mist system in Engine Room not working. 5. Fire damper not properly closing. 6. Main Engine high pressure fuel pump is leak large amount of fuel oil. 7. Safety management audit by the Administration is required before departure of the ship. 8. Found cargo (hatch) entrees not properly closing. 9. Despite the fact manholes were closed ,the water was pressed out from the ballast tank on deck. 10. Large store cover ER showing signs of corrosion. 11. Watertight door forecastle is not able to be properly closed.
- **Investigation:** This ship was changed ship owner and managing company in June, 2017, and directly put into operation until detention without necessary repairs and supplies, which caused the lack of variety of spares and maintenances. The lack of maintenance of the ship was confirmed, and meanwhile the PSCO proposed detention deficiencies related to ISM.
- **Lessons to be learned:** Sometimes during deficiencies rectification, problems cannot be all solved before sailing due to time limit, therefore part of the deficiencies were dealt with temporarily. Companies applied for exemption and postponement from the flag state and received agreement, but the PSCO refused to accept the exemption and insisted on ship's sailing after repair. Ultimately PSCO confirmed the elimination of all deficiencies, and removed detention after 3 months of ship company's system review. The PSC in Europe is famous for strictness and more deficiencies detected, with most among which leads to detention and related to ISM. They follow the principle strictly and does not accept the exemption from the flag state or explanation from class society. Ships sail to Europe shall pay extra attention on ship's safety management, maintenance and MLC labor inspection, and apply for PSC pre-inspection if necessary.



## Case study on detentions – Jan. 15, 2018 Netherland



Rudder angle and speed indicator in abnormal condition



Untidy restroom, invalid flushing system



Deteriorate vegetable, and lack of dry food



Washing machine doesn't function



## Case study on detentions – Jan. 15, 2018 Netherland



The cap for sounding pipe cannot be closed



Poor condition of air pipe head



Low pressure of controlled air, and the quick closing valve cannot be closed



E.R. local water mist system failed

## Case study on detentions – Jan. 15, 2018 Netherlands



Gooseneck ventilator cannot be closed



Shutter for ventilation opening in engine room cannot be closed



Set pin for small hatches of engine room casting missed



Manhole cover of cargo hold cannot be closed



## Case study on detentions – Jan. 15, 2018 Netherland



Invalid water tightness of manhole cover of ballast tank



Sealing rubber gasket of engine room casting failure



The store room door at forecastle can not be closed properly



Clamming device of cargo hold hatch cover-malfunction

## Case study on detentions – Jan. 31, 2018, China



- **Deficiencies for detention:** Quick closing valve of fuel oil tank malfunction; Chemicals supply pump of sewage water treatment plant failed.
- **Non-detention deficiencies:** No drying device in laundry room; no medical-used oxygen cylinders; no first-aid kit in Engine control room; crew member could not neatly handle the CO<sup>2</sup> fire extinguisher; no certificate of oil water separator model, etc.
- **Investigation:** During PSC inspection, the Chemicals supply pump of sewage water treatment plant was found failed, and could neither be solved immediately nor reported to RO or Flag State; lack of attention on implementation of MLC Convention; the ship's implementation of ISM did not include ship's maintenance, and lack of training to the crews.
- **Lessons to be learned:**
  - ◆ When ship encounters problems that cannot be solved alone, shall report to the company according to requirements; and the company shall take immediate measures and report to flag state, class society, and local PSC, in order to obtain exemption or understanding;
  - ◆ Strengthen the ship's safety management, crew's training, maintenance, and MLC labor inspection.

## Case study on detentions – Jan. 31, 2018, China



Quick closing valve of fuel oil tank did not work



Chemicals supply pump of sewage water treatment plant failed



No medical-used oxygen cylinder (already equipped)



No first-aid kit in engine control room (already equipped)

## Case study on detentions -- Feb. 20, 2018, Japan

- **Deficiencies for detention:** The CO<sup>2</sup> pipe of the No. 2 cargo hold was holed.
- **Non-detention deficiencies:** The monitoring and review required were not conducted; Cargo residue-not record in “GRB” since April 2017.; reasons to not exchange ballast water was not filled in Ballast Water Record book; Much oil--absorb into fire insulation near "FO steam pipe"; protection cover for generator shaft was lost.
- **Investigation:** The steering gear of the ship failed during port arrival and the time spent on repairing in the sea-lane was longer. So, caused PSCO attended onboard for PSC inspection. PSCO found the CO<sup>2</sup> of the No. 2 cargo hold was holed, which led to the detention.
- **Lessons to be learned:**
  - When ship encountered failure and does not report to the local PSC, complaint from relative parties is likely to arise; therefore the PSC must carry out strict inspection and might lead to detention. Accordingly, under circumstances of severe problem that cannot be solved immediately, one shall report to relevant parties as soon as possible, and take measures actively;
  - Strengthen ship's maintenance, pay extra attention on important equipment; not only painting but also rust removal shall be conducted to erosive; clean oil dirt in the engine room on time, especially those on the high temperature surface;
  - Strengthen management on ship's file and crew's training; conduct every task according to requirements and record accurately.



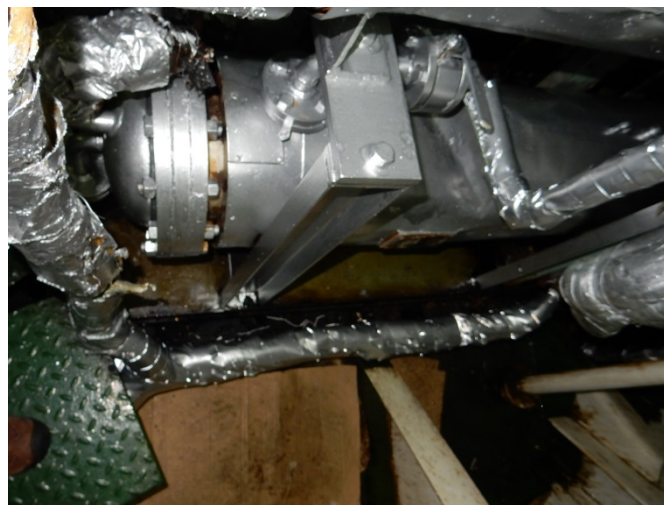
## Case study on detentions -- Feb. 20, 2018, Japan



CO<sup>2</sup> pipe of cargo hold was hold (renewed)



Protection cover of generator shaft lost  
(temporarily installed)



Steam heating tube of oil supply  
unit - after oil dirt removed

## Case study on detentions – Jan. 26, 2018, Australia



- **Deficiencies for detention:** Several seafarers have not been paid at monthly intervals in full for their work, in accordance with SEA or collective bargaining agreement; Evidence of victimisation of seafarer for making a complaint.
- **Investigation:** Crew's salary does not meet with the figure signed with ITF in collective bargaining agreement, which caused crew's complaint and forced embarkation. ITF and AMSA officials communicated with complaining crews on land and detained the ship after relevant information obtained. The ship was released after the company re-distributed paycheck and the class society conducted MLC additional inspection.
- **Lessons to be learned:**
  - With the consistent implementation of MLC, we witnessed stricter PSC inspection. AMSA bares no tolerance to back pay and fake pay, and especially complaint from crews or ITF. Once problem discovered, the ship would face detention.
  - Ship company shall implement MLC requirement strictly, and earnestly sign and carry out the crews' employment agreement with no practice of fraud; crews' healthy lives shall be treasured in order to avoid complaint.
  - A ship managed by Chinese company was detained in July due to crews' complaint of unconformity between salary received and that in employment agreement. The ship was also requested not to sail to any port of Australia within one year. Hence we hope all companies overcome the economic difficulties and guarantee crews' interests.



## Case study on detentions – Mar. 12, 2018, Australia



- **Deficiencies for detention:** Rescue boat engine defective.
- **Non-detention deficiencies:** Oilers are keeping engine room watches alone while ship is in port and at anchor without safety measures or monitoring of oilers in place; Garbage record book entries for cargo residues recorded under Category F in garbage record book No1.
- **Investigation:** During the ship's PSC inspection, the engine of the rescue boat could not be started for 2 hours, which led to the ship's detention. Inspection revealed that during testing 2 days ago, the cooling water ejected and entered into the oil tank, which caused the pipe sucked with water and the failure to the engine. After the crews cleaned pipes and tested normally, the detention was removed.
- **Lessons to be learned:**
  - Rescue boat, especially the engine test is a must for PSCO; the failure to boat engine or to restoration of carrying/releasing device is severe and leads to detention. Therefore, the rescue equipment shall be thoroughly inspected and tested, to guarantee its availability and safety.
  - Personnel at the company gave wrong instructions regarding garbage disposal; therefore training related to garbage management shall be conducted to shore-based personnel and crews.
  - Deepen the studying and understanding of STCW; while ship's at port (berth and anchorage), there must be 2 crew members on duty in the engine room, including one engineer.

## Case study on detentions – Apr. 19, 2018, Peru

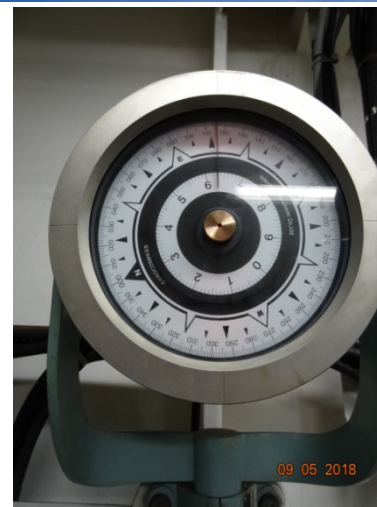


- **Deficiencies for detention:** VDR unit is out of order-disconnected.
- **Non-detention deficiencies:** Gyro repeater from steering position out of order; Freefall lifeboat with glass dirty-vision obstructed; Fire panel with alarm in paint store; All items are objective evidence of ISM failure-internal audit is required within 3 months.
- **Investigation:** When PSC checked VDR, it showed "SYSTEM ABNORMITY". The Master explained to PSCO that it was already reported to the company, who had contacted the local service agent, but relevant document had not been able to be submitted to the flag state, class society and local PSC in advance; however the PSCO insisted on detention. After immediate repair by local service agent, VDR was able to function normally and passed tests; the detention was removed.
- **Lessons to be learned:**
  - When ships encounter severe problems that cannot be self-settled, one shall report to the company as soon as possible, and meanwhile the company shall report to the flag state or class society, and local PSC organization and take active measures, provide relevant contact information and evidence during PSCO inspection.
  - Strengthen ship's maintenance and safety inspection, and shore-based personnel shall give feedback and support to ship's problems as soon as possible;
  - Some PSC in south American areas tend to connect the deficiencies with ISM implementation failure and the ship would be requested an internal review and sometimes with additional external review when necessary.

## Case study on detentions – Apr. 19, 2018, Peru



VDR damaged (already repaired)



Repeater of gyro compass in steering gear room failed



Fire detector in paint room damaged (already replaced)



The window of the free fall lifeboat not clear (already replaced)

## Case study on detentions – May 11, 2018, Japan



- **Deficiencies for detention:** 1、 Crew is not familiar with essential shipboard procedures relating to the safety of the ship. The crews were unable to perform a satisfactory rescue boat drill. Crew failed an attempt to perform the rescue boat drill as evident by unfamiliarity with procedures of release and recovery for rescue boat. 2、 Master and crew members were not aware of their tasks, duties or responsibilities as evident by deficiency in item #1.
- **Non-detention deficiencies:** Crews were not familiar with the use of BNWAS equipment; non-efficient filling of drawings of voyage plan (V. No 1812P), and did not use large-scale sea chart; zip of immersion suit damaged; hooks of rescue boat was not flexible; the fixed link of weather facsimile antenna was severely rusty.
- **Investigation:** Unskilled practice of man-overboard drill—poor cooperation of crew members and unskilled boat operation; the crews began unlock the fixed steel rope even before rescue boat was ready; over long time to retrieve rescue boat, and the boat could not be placed under the davit, which caused the PSCO to consider a drill failure and accused crew members not familiar with responsibilities, and finally caused detention.
- **Lessons to be learned:**
  - Company shall implement effective trainings and conduct every emergency drills earnestly;
  - Conduct ship's maintenance and safety inspection effectively;
  - PSCOs raised high standards toward drills and detention often happens, We hope companies could pay more attention;
  - Strengthen the crew's ability to connect to PSCOs, guarantee effective communication between crew members and PSCO, and explain to PSCO's questions in time.



## Case study on detentions – May 11, 2018, Japan



Ship's crews were not familiar with releasing/recovering rescue boat



Damaged zip on immersion suit



Hook of rescue boat seized



The antenna fixed rod is seriously corroded(already repaired)



## Case study on detentions – May 11, 2018, Korea



- **Deficiencies for detention:** 1. Ship's nationality cert. and minimum safe manning cert. not onboard; 2. Emergency fire pump failed during test and unable to operate; 3. Unapproved rubber pipe used and found on E/R floor.
- **Investigation:** Main engine turbo was damaged during sailing, and the ship sought help from Korean coast guard for tugging to the closest anchorage, which caused the following inspection onboard from PSCO. Ship's certificates were found incomplete, and the bearings of emergency fire pump was found damaged and the unapproved rubber tube was found in engine room; therefore the ship was detained.
- **Lessons to be learned:**
  - PSCO's attention was raised due to the damage to the main engine turbo, which served as the incentive for PSC inspection and detention.
  - Company has fluke mind and permit ship sails without nationality certificate and minimum safe manning certificate, hoping to receive the certificates upon the arrival of first port in Korea by agent.
  - Conduct ship's maintenance and safety inspection effectively, and rectify latent defects of fire emergency equipment;
  - Copper tube was originally used as releasing tube for cooling water of air cooler for main engine; yet the crew member replaced it with rubber tube for convenience. Combustible materials such as rubber or plastic tube shall not be used in engine room to keep equipment sound and intact.
  - After the main engine turbo was damaged, the company did not report to competent authorities in flag state or applied for surveys from class society as soon as possible. Companies shall implement report procedure strictly according to system requirement and avoid system failure.

## Case study on detentions – May 11, 2018, Korea



Bearings of emergency fire pump damaged



Test after restoration of emergency fire pump



Dismantled rubber tube



Copper tube replaced

## Case study on detentions – May 28, 2018, Italy

- **Deficiencies for detention:** 1. During fire drill lack of familiarity showed by crew member especially the 2 of fire team. 2 Self closing fire doors no. 105, 109 and 117 not closing. Maintenance is required. 3. During abandon ship lack of training showed by crew. Some of them joined the others after the end of the drill. Master justified only one crew member at the gangway for the security checks. 4. Safety management audit by the Administration is required before departure of the ship. Deficiency(s) marked ISM is(are) objective evidence of a serious failure, or lack if effectiveness, of implementation of the ISM Code.
- **Investigation:** Fire fighters were not familiar with fire-fighting equipment—could not wear breathing mask properly and caused the air leakage; PSCO required all crew members to attend drill of ship abandonment and gather at one side of the ship (1 crew on on duty of access control), but still some crews joined the drill at the end of the drill; the automatic closing doors of air-conditioner room, fire station, and foam room could not be self-closed; PSCO connected the No. 3 and No. 4 deficiencies to ISM, and considered ineffective implementation of system. PSCO detained the ship based on the deficiencies discovered.
- **Lessons to be learned:**
  - Crews lack emergency drill training; part of the crews were not familiar with their responsibilities during drill, which led to their late participation to the drill and wrong wearing method of the breathing mask, etc.;
  - Fire proof door and cleanness of the engine room are focuses of PSCO inspection, and very likely to cause deficiencies and detention. Ship's maintenance and safety inspection must be conducted effectively in order to discover and clear the problem in time;
  - European PSC often connect deficiencies with ISM, which cause high risks of the ship's detentions. Ships sail to Europe shall conduct self-inspections to decrease deficiencies and avoid detention.

## Case study on detentions – May 28, 2018, Italy



Automatic closing fire door (after rectification)



Cleaned bottom of auxiliary engine



Security bulletin board (after rectification)



## Case study on detentions – Jun. 7, 2018, Netherland



- **Deficiencies for detention:** 1. Pipe tunnel entrance cover in ER could not be opened due to water ingress in the pipe tunnel. 2. Fire detector system switched off and out of order. 3. Proper functioning of water ingress alarm could not be demonstrated. 4. No reporting to PSC was done of mentioned defects. No reporting towards CCS and Flag state could be handed-over by. 5. During spot check it was witnessed that several hold entrance hatch covers could only be close by means of 2 cleats instead of 4. 6. The fire dampers of the engine room (hand wheel operated) could only be operated with great force. 7. Safety management audit by the Administration is required before departure of the ship. Deficiency(s) marked ISM is (are) objective evidence of a serious failure, or lack of effectiveness, of implementation of the ISM Code. 8. The breaker for the emergency fire pump on the emergency switch board is in off position.
- **Non-detention deficiencies:** Control distribution box of the crane jib of rescue boat davit did not work (crews did not understand the PSCO test requirement); transverse rotary limit switch of the oil hose at port side lost; No. 3 generator could not be started (tried 20 times and failed); lots of alarm signals showed in alarm system in engine room; leakage of high pressure oil pump after changing to low suffer oil; one spot of leakage in hydraulic pipe of hatch cover; crews unfamiliar with operation of local water mist system.
- **Investigation:** Water leaked from the joining area of ballast pipe (FRP material) in pipe tunnel, which caused the immersion of pipe tunnel and inability to open tunnel cover, further caused the fire detecting alarm, water ingress alarm and emergency fire pump that connected to it were immersed by water and could not function. After the accident, the company and ship did not report to local PSC, and flag state or class society with explanation; also, the fact that the small hatch cover and fire damper could not be closed and with other non-detention deficiencies, PSCO considered lack of validity of system operation and determined to detain the ship.



## Case study on detentions – Jun. 7, 2018, Netherland



### ▪ Lessons to be learned:

- The main reason that led to detention is that the company and ship did not report to the local PSC, and flag state or class society after the accident. If the company or ship reported and applied for survey, this amount of detention deficiencies might not be proposed by PSCO.
- Total 15 deficiencies were mentioned, among which 8 led to detention. It is obviously noted that the European PSC follows strict rules, and slightly severe deficiencies might lead to detention.
- 11 out of 15 deficiencies were ISM related, and one detention deficiency related to ISM was directly proposed. European PSC often connected deficiencies with ISM, and if more ISM-related deficiencies were discovered (1 ISM-Related deficiency = 5 common technical deficiencies), the ship is very likely to be considered high risky, which led to high frequency of inspection and further influence the whole fleet of ships.
- The deficiencies showed the difference between ship's maintenance and standards. Ships sail to Europe must carry out inspection before arrival at port, fully inspect and test all equipment on board, discover and settle problems in time, and keep all equipment in good condition.
- European PSC treasures MLC inspection. Ships shall be kept in sanitary condition, eliminate all leakage, maintain good working and living condition, and decrease deficiencies as much as possible to avoid detention.
- If ship encounters problems that cannot be settled alone, one shall report to the flag state or class society and apply for postponement, in order not to be detected by PSC and detained.

## Case study on detentions – Jun. 7, 2018, Netherland



Water leakage of ballast pipe of pipe tunnel



Oil leakage of high pressure oil pump



Damper of ventilator of engine room cannot be closed



Small hatch cover cannot be closed tightly

## Case study on detentions – Jun. 7, 2018, Netherland



Leakage of hydraulic oil pipe on deck



Fire detecting system in cargo hold failed



Emergency fire pump did not work



Water ingress alarm failed

## Case study on detentions – July, 2018, Australia



- **Deficiencies for detention:** The PSC inspection revealed 6 deficiencies, which include 2 detention deficiencies and were both MLC related, and issued a restraining order of not entering Australia water within 1 year.
- **Investigation:** Due to the complaint from foreign crew on not receiving enough salary, ITF/PSCO attended on board for investigation on part of crews, and obtained information through private conversations. The company was not familiar with the details and forced to provide evidence, and further exposed that 2 contracts were kept. Salary of part of the crew did not match the SEA standards, which caused dissatisfaction from PSCO/ITF, and led to detention and restraining order.
- **Lessons to be learned:**
  - Unfulfilment of risk management. The reason for ITF inspection onboard was the complaint from foreign crew on short of promised salary (ITF website showed the inspection date was Jul. 5 and the ship was at anchorage and not berthed yet). The crew complained through Wifi on cellphone.
  - Crew complained to Master on Jul. 4, and investigation revealed that the company has paid salary but the agency company deducted the deposit; the Master explained to the crew who expressed understanding, but there was no following up measures and settlement with agency company. The inconsistency of work led to complaint.
  - Unfulfilment of recognition and management of known risk. The lack of training on crews' familiarization of ITF inspection and MLC salary clause caused the ineffective reply to ITF inspection, and further led to the dissatisfaction of ITF officials and PSCO.
  - No experience on hiring foreign crews; the company lack the emergency plan and measurement in preventing/dealing with ITF complaint.



# MARPOL ANNEX VI CIC



The Maritime Authorities of the Tokyo and the Paris Memoranda of Understanding (MoU) on Port State Control will launch a joint Concentrated Inspection Campaign (CIC) on MARPOL Annex VI. This inspection campaign will be held for three months, commencing from 1 September 2018 and ending 30 November 2018. A ship will be subject to one inspection under this CIC during the period of the campaign.

❖ The main objectives of this CIC are to::

- establish the level of compliance with the requirements of MARPOL Annex VI within the shipping industry;
- create awareness amongst ships' crew and ship owners with regard to the importance of compliance with the provisions of MARPOL Annex VI and the prevention of air pollution;
- send a signal to the industry that prevention of air pollution and enforcement of compliance with applicable requirements is high on the agenda of both MoU member States; and
- underline the responsibility of the Port State Control regime with regards to harmonized enforcement of compliance with the requirements of MARPOL Annex VI, thus improving the level of compliance and ensuring a level playing field.

❖ Port State Control Officers (PSCOs) will use a list of 11 questions to assure that equipment carried onboard complies with the relevant statutory certificates, the master and officers are qualified and familiar with operations and that equipment is properly maintained and functioning.

❖ If deficiencies are found, actions by the port State may vary from recording a deficiency and instructing the master to rectify it within a certain period of time to detaining the ship until the serious deficiencies have been rectified. In the case of detention, publication in the monthly detention lists of the Tokyo and Paris MoU web sites will take place.



# MARPOL ANNEX VI CIC



|        | Questions                                                                                                                                                                                                                                                                                                                                                         | Yes | No | N/A |
|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 1      | Are bunker delivery notes, with details of fuel oil for combustion purposes, kept available on board for the required period of 3 years?<br>Annex VI, regulation 18.5 and 18.6                                                                                                                                                                                    |     |    |     |
| 2<br>* | Do bunker delivery notes indicate that fuel oils delivered and used on board is not exceeding the maximum allowed sulphur content, as appropriate?<br>Annex VI, regulation 14.1.2 and 14.4.3                                                                                                                                                                      |     |    |     |
| 3      | Do ships which are using separate fuel oils to comply with the maximum sulphur content of 0.1% m/m in fuel oil while operating in SOx emission control areas, have a written procedure showing how fuel oil change-over is to be done for achieving compliance with the above requirements when entering SOx emission control areas?<br>Annex VI, regulation 14.6 |     |    |     |
| 4<br>* | Are alternative arrangements, (e.g. scrubbers) installed on board according to regulation 4.1 approved by the flag State?<br>Annex VI, regulation 4.1                                                                                                                                                                                                             |     |    |     |
| 5      | Do ships which are using separate fuel oils to comply with the maximum sulphur content of 0.10% m/m in fuel oil and entering or leaving SOx emission control areas, record detailed information showing that the ship has completed/initiated the change-over in the logbook prescribed by the Administration?<br>Annex VI, regulation 14.6                       |     |    |     |
| 6      | Do ships which have rechargeable systems containing ozone-depleting substances (refer to the supplement to the IAPP Certificate, item 2.1), have the ozone-depleting substances record book maintained?<br>Annex VI, regulation 12.6                                                                                                                              |     |    |     |

# MARPOL ANNEX VI CIC



|    | Questions                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Yes | No | N/A |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 7  | Where an Approved Method in accordance with Annex VI, regulations 13.7.1-13.7.5 (refer to the supplement to the IAPP Certificate, item 2.2.1) is installed, has such an installation been confirmed by a survey using the verification procedure specified in the Approved Method File, including appropriate notation on the ship's International Air Pollution Prevention Certificate of the presence of the Approved Method?<br>Annex VI, regulation 13.7.1.1 |     |    |     |
| 8  | For ships equipped with a shipboard incinerator or thermal waste treatment device installed as an alternative arrangement, is the ship's crew responsible for the operation of the equipment familiar with, properly trained in, and capable of implementing the guidance provided in the manufacturer's operating manual?<br>Annex VI, regulation 16.8                                                                                                          |     |    |     |
| 9* | Are the master and crew familiar with essential shipboard procedures in the approved VOC Management Plan relating to the prevention of air pollution from ships?<br>Annex VI, regulation 15. 6                                                                                                                                                                                                                                                                   |     |    |     |
| 10 | Does the ship keep on board a Ship Energy Efficiency Management Plan (SEEMP)?<br>Annex VI, regulation 22 paragraph 1                                                                                                                                                                                                                                                                                                                                             |     |    |     |
| 11 | Was the ship detained as a result of the Inspection Campaign?                                                                                                                                                                                                                                                                                                                                                                                                    |     |    |     |

Note: Questions 1 to 10 answered with a "NO" MUST be accompanied by a relevant deficiency on the Report of Inspection. If the box "NO" is ticked off for questions marked with an "\*", the ship may be considered for detention.

**This Society suggest all companies to prepare in advance, conduct crew training, and carry out targeted shore-based supervision.**

# Recommendation on PSC work



- ◆ PSC inspections in Australia, Japan, European countries were strict, which might lead to detentions. We suggest companies strengthen the management of ships sailing to countries where detentions often happen, closely supervise the crews to conduct inspection and maintenance before arrival at port, settle problems existed on board, and invite outside organizations to carry out PSC pre-survey/co-survey.
- ◆ Inspire crews to detect deficiencies and report to company in time, and company shall assist the ship with rectification. If deficiencies cannot be rectified immediately, the company shall report to the competent authority of the flag state, or the RO and local PSC organization authorized by authority of the flag state, in order to obtain exemption and postponed rectification issued by competent authority of flag state or RO, and try to gain understanding from PSC organizations, avoid unreported deficiencies discovered by PSC and led to detentions.
- ◆ More and more MLC related deficiencies were detected, complaint from crews of unpaid wages existed onboard some ships, as well as damage of living equipment, and lack of food and drinking water, etc. MLC related inspections in all countries will be stricter and likely to detect deficiencies and trigger detentions, which is due to ISM'S severe unconformity to requirements. We hope all companies to pay more attentions.

# Recommendation on PSC work



- ◆ Make sure the equipment such as rescue boat, life raft, air pipes, fire proof/weathertightness doors, damper, quick closing valve, ventilator, emergency generator, CO<sup>2</sup> pipes, oil water separator, and hatch covers are in good condition, which helps to avoid detentions. We suggest guarantee the equipment's safety inspection and maintenance, and carry out inspection before arrival at port, and settle existed problems in time, in order to decrease detentions
- ◆ First impression is critical. Public places and sanitary equipment shall be kept clean and intact. Engine and equipment shall be free of obvious leakage of oil water and smoke. Ship shall be free of obvious rust, and keep thermal insulation material intact, and the kitchen and reefer space clean, in order to effectively decrease deficiencies.
- ◆ Emergency drill is focused during PSC inspections in some countries, and problems discovered will be connected to ISM and cause detentions. Therefore we suggest company supervise ship's emergency drill and training, carry out drill plan as schedule, pay attention to details and guarantee the drill result. During PSC inspections, crew members shall keep good condition and fully cooperate with calmness, clear with instructions and respective responsibilities, carry out drill procedure and simulate real situation, record every drill earnestly, as well as video document.

# Recommendation on PSC work



- ◆ Strengthen the training, drill, practice of emergency operation on crew members, especially the Master and senior crews shall be familiar with their responsibilities and on-site instructions; necessary training shall be conducted to shifts of crews.
- ◆ Raise the legal awareness of implementing MLC requirement, completely eradicate two contracts and two accounts.
- ◆ Understand and use Collective Negotiation Contracts correctly.
- ◆ Analyze and recognize the potential risks of hiring foreign crews, and improve the level of management.
- ◆ Study the complaint related regulations of MLC and improve the ability to handle complicated outside complaints.



## Latest relevant information



Competent authority of Marshall (Marine Safety Advisory No. 21-28)

- Overview: 5 ships of RMI were detained by USCG in 2017, and 6 till January to July in 2018. Recently detentions often happened due to fuel leakage in engine room no matter how slight the leakage was. Marshall issued MSA 21-18 to replace MSA 51-17, emphasized the importance of ships' finishing, reviewing and submitting the Critical Items Checklist (RMI Form MSD-340) before arriving at any American ports, and offered latest study cases of detention deficiencies.
- Requirement: Other inspection items along with the inspection list shall be reviewed and settled carefully before arriving at American ports, and the filling requirements are written in "*RMI Maritime Notice 5-034-5*". It was stipulated that Master and Chief Engineer shall finish, sign, and submit checklist (RMI Form 340); Failure to complete the MSD 340 may be cause for suspension of the officer's RMI seafarer documents and/or an additional audit of the vessel or Company SMS.
- Relevant video of inspection checklist can be found on website: <https://www.register-iri.com/index.cfm?action=page&page=240>

## Latest relevant information



### MARINE SAFETY ADVISORY NO. 21-28

Deficiencies that have led to detentions on RMI vessels, include:

- Quick Closing Valves intentionally blocked or disconnected;
- Insufficient pressure from emergency fire pump;
- Emergency generator failed to start in automatic or manual mode;
- Crew unable to launch the lifeboat;
- Inflatable life rafts with hydrostatic release units not properly attached so that they could “float free”;
- Rescue boat engine was not able to start;
- Gas sampling lines disconnected during cargo operations
- Hyper-mist systems set to manual mode or in the off position or sea suction valves closed during the PSC exams;
- Smoke detectors blocked, covered up, or inoperable;
- Lack of familiarity with the OWS;
- Oil Record Book (ORB) not accurately being maintained. The historical data on the 107(49) OCM did not match the ORB written entries;
- Poor performance during the fire, abandon ship, and confined space entry and rescue drills;
- Inoperative Inert Gas System;
- Excessive fuel oil leaks and oil-soaked lagging; and
- Blocked or clogged deck water spray nozzles on LPG vessels.



Thank you for your strong supports to CCS!

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