

I. Overall conditions for the third quarter of 2020

1. PSC statistic for the third quarter of 2020

TOKYO MOU: 435 ship-times in terms of inspection of CCS ships, 6 ship-times in terms of detentions, with a detention rate of 1.38%.

PARIS MOU: 83 ship-times in terms of inspection of CCS ships, 1 ship-time in terms of detention, with a detention rate of 1.20%.

USCG: About 40 ship-times in terms of inspection of CCS ships, 0 ship-time in terms of detention, with a detention rate of 0%.

To sum up, during the PSC inspections of TOKYO MOU, PARIS MOU and USCG, there are totally 558 ship-times in terms of inspection of CCS ships, 7 ship-times in terms of detention, with a detention rate of 1.25%.

2. List of ships detained in the third quarter of 2020:

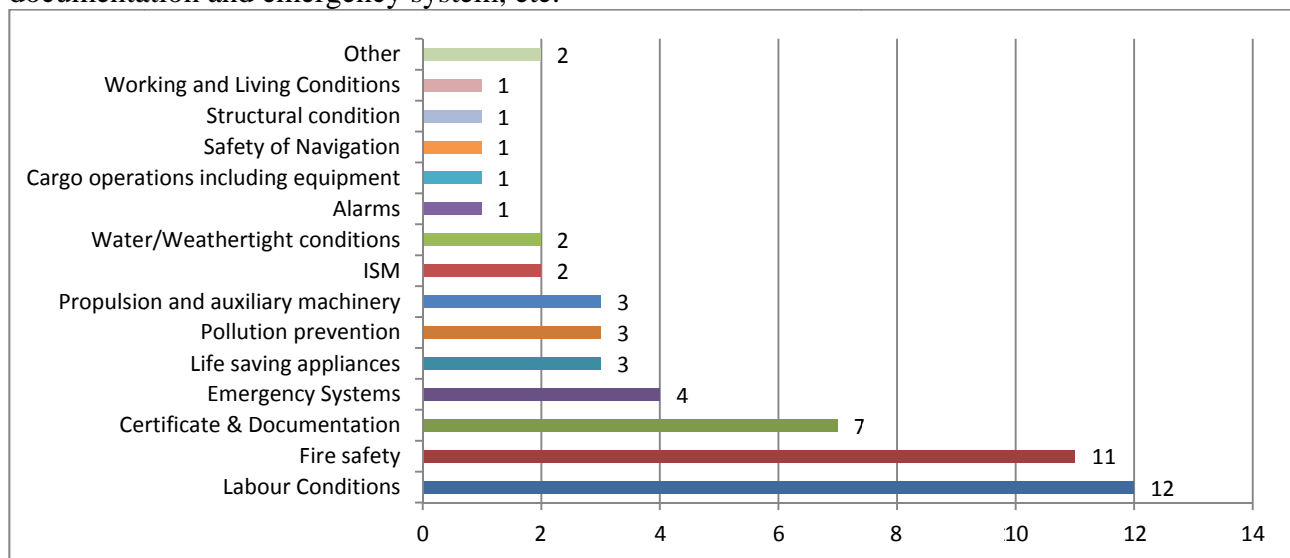
Name of Ship	Type of Ship Year of Built	Regime of Detention Date of Detention	Detainable deficiency
A	General Dry Cargo Ship 2007	Australia July 9	1. Several ballast tank air vents and closing arrangements defective. 2. Port side life boat engine defective. 3. Reference to deficiency No.1, it is the objective evidence that the vessel has not been maintained after survey.
B	Bulk Carrier 2000	Australia July 20	Sewage treatment plant has no filtering medium inside unit and scout air valve #(6) was opened normally closed.
C	Bulk Carrier 2016	Australia Jul7 25	Crew SEA's signed on joining date & current contracts renewed on 1.1.2020 for 7 months with included wage rates not being paid to crew as shown in wage account statements up until May 2020.
D	Bulk Carrier 2016	Belgium Aug.7	1. All crew but one on board since 03.07.2019, with further extensions signed until Nov./2020. No communication with Flag State available about extending SEAs and further conditions thereto as included in the Government Circular Letter of 31.07.2020. Next port is not fixed evidence was found that on signing crew is ready in China but ship owner opts to not carry out crew change in Ghent because there is "no time". 2. "Proficiency in survival craft and rescue boats other than fast rescue boats" (STCW A-VI/2) expired since 2018 for two crew members. No evidence of grant of extension of certificate by Flag State. 3. For several crewmembers, found that the wage totals on the wage accounts are less than the wage totals as agreed in the SEAs 4. Safety management audit by the Administration is required before departure of the ship. Deficiencies marked ISM are objective evidence of a serious failure, or lack of effectiveness, of implementation of the ISM Code.
E	General Dry Cargo Ship 2008	Australia Aug.18	Emergency Generator found defective during the time of this inspection.

F	Bulk Carrier 2007	Australia Sept.7	No.4 Engine room fire damper defective.
G	General Dry Cargo Ship 2007	Japan Sept.28	A-60 fire insulation on boundary Bhd & deck of E/R aft—not installed: 1) Bhd adjacent to EFP' compartment ; 2) Deck adjacent to CO2 Rm in way of Fr.7 to 8.

II. Statistical analysis of data about ships detained in the third quarter of 2020

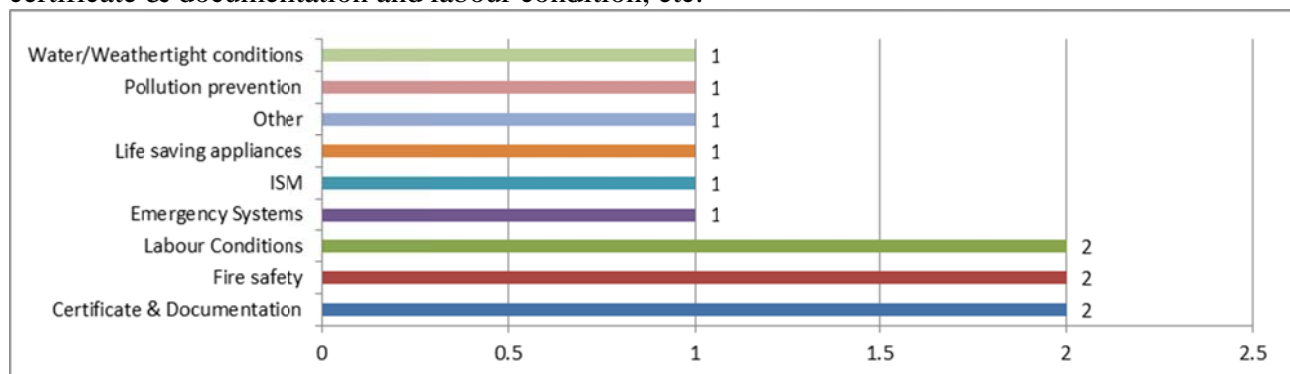
◆ All deficiencies:

For these 7 ship-times of CCS ships receiving detention reports, and subject to investigation and handling, there were totally 53 deficiencies, with an average of 7.57 deficiencies for each ship detained. There were relatively many deficiencies in labour conditions, fire safety, certificate & documentation and emergency system, etc.



◆ Detainable deficiencies

For these 7 ship-times of CCS ships receiving detention reports, and subject to investigation and handling, there were totally 12 detainable deficiencies, with an average of 1.71 detainable deficiencies for each ship detained. There were relatively many detainable deficiencies in fire safety, certificate & documentation and labour condition, etc.



◆ Ship types distribution of ships detained:

Among 7 ships detained, 4 ships were bulk carriers, 3 ships were General Dry Cargo Ships, respectively.

◆ Ship ages distribution of ships detained:

Among 7 ships detained, 4 ships were 10-15, 1 ship was 0-5, 5-10 and 15-20 years respectively.

◆ Gross Tonnage distribution of ships detained:

Among 7 ships detained, 4 ships were above 30000 GT, 2 ships were 3000 to 10000 GT, 1 ship was

500-3000GT.

◆ **Distribution of countries/regions related to detentions**

Among 7 ships detained, 5 ships were detained by AMSA, 1 ship was detained by Belgium PSC and 1 ship was detained by Japan PSC.

III. Some deficiency pictures (only for the third quarter of 2020)



Air vents and closing arrangements defective



Air vents and closing arrangements defective



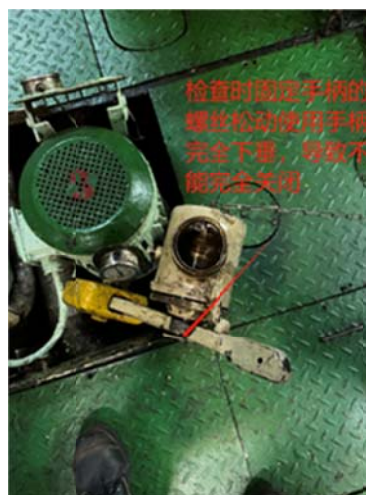
Life boat engine defective (Starting motor renewed)



Life boat engine defective (Starting button renewed)



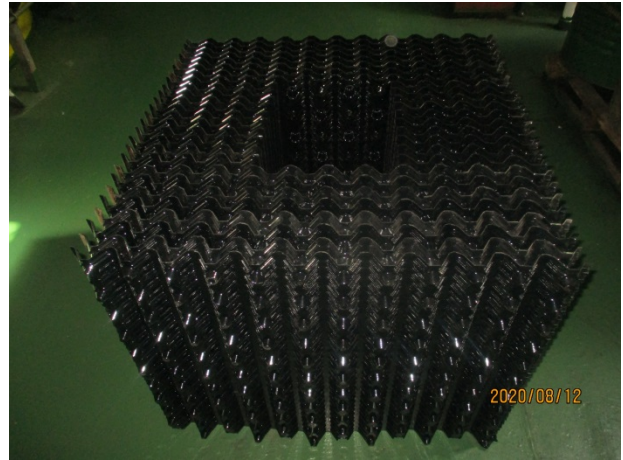
Sewage treatment plant defective (air pump not work)



Self-closing cock defective



Heat insulation lagging missing (rectified)



Sewage treatment plant has no filtering medium(Spare)



Sewage treatment plant scour air valve #(6) was opened (to be closed normally)



Foam fixed fire extinguishing system three operating valves closed (opened normally)



smoking room sofa damaged



smoking room chair damaged



The M.E. local control can't be operated



Engine room bilge pump is inoperative



One EEBD in wheelhouse with insufficient pressure



Fireman's outfits do not fulfil the requirements



Rescue boat operating instructions rescue boat unreadable.



Hydraulic oil on electric box of pump motor



Forward mast stay wires defective (renewed)



Several mooring ropes in use are defective



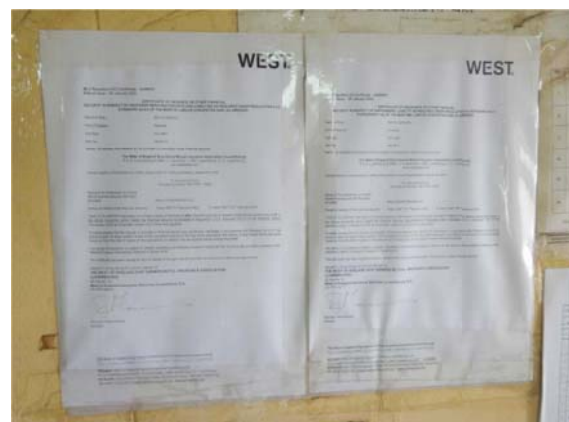
Cargo handling equipment does not marked S.W.L.(rectified)



bunker line on deck and ER indicator of position unreadable



Emergency Generator found defective



Assurance of seafarer repatriation—not posted(rectified)



Galley duct for ventilator—dirty with oil



Rescue boat maneuvering—no record over 3 months



Fire door self-closing device damaged.



Funnel fore BHD—corroded and holed(repaired)



E/R skylight coaming corroded and holed



Mooring rope poor condition



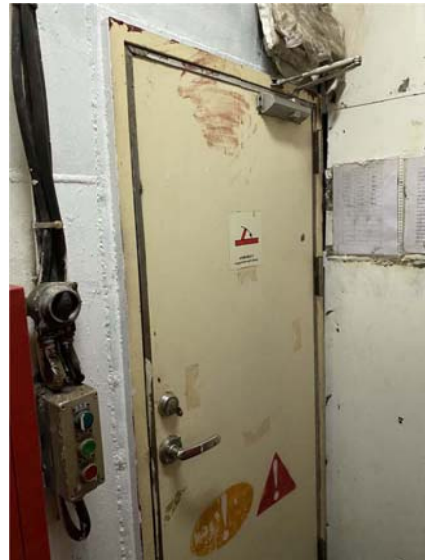
Fire damper of E/R vent—unable to close smoothly



E/R E.F.P suction pipe with flanges



Engine Room fire damper defective



Gaps between fire door frame and BHD (welded) .



Emergency light secured by wire/rope



Turbo charger and exhaust trunk insulation defective



Lever pin of boiler safety valve removed, hand operation impossible.



Fire door self-closing device-defective

IV、 Detentions by Flag State inspection in 2020

From Jan. 1 to Sept. 30, 2020, Classed Ship in Service Department of CCS Headquarters received total 3 ship FSI detentions by China MSA and listed as following :

Name of Ship	Port of detention	Date of detention	Detainable deficiencies
H	Guangzhou	2020-07-02	1. 6 and 5 levers for tightening hatch covers no. 1 and No.2 lost were missed. 2. Wrong stability calculation. 3. Oil sensor and discharging valve of OWS defective. 4. A port of insulation on bulkhead in E.R. was not A-60 class. 5. There is no alarm in whole ship after fire alarm in wheel house sounding 5 minutes.
I	Wenzhou	2020-07-29	Fire main on main deck corroded and holed.
J	Qinhuangdao	2020-09-22	1. Distance of signal lights was 1 m,(less than 2 m). 2. Signal light was obstructed by mast more than 6 degrees. 3. L.O low pressure alarm of M.E. failure. 4. Oil discharging solenoid valve of OWS was malfunction.

All 3 detentions were occurred in the third quarter of this year and all 3 ships detained by FSI were Domestic sailing Bulk Carriers.

V. Suggestion

- Now, although COVID-19 is still spreading in the world, it caused that ship managements were affected seriously, but PSC inspections increased than past two quarters obviously and ships detentions were occurred continually. Ship managing companies should guide the ship to

prevent COVID-19 actively, ensure seafarer's health safety and benefits, ensure ship's supply, strictly supervise ship to carry out pre-arrival inspections and ship maintenances, try to decrease ship PSC deficiency and detention.

- From Jan. 1 to Sept. 30, 2020, total 19 CCS ships were detained by PSC, among which, 17 CCS ships were detained by Tokyo MOU, 11 CCS ships were detained by AMSA and it took up about 58% of total detentions. Each ship company should enhance to supervise ships sailing to Australia ports, when it is necessary, to invite other organization to attend onboard the ship to carry out PSC pre-inspection or assistance of PSC inspection to decrease similar ship detention.
- In the third quarter of 2020, there are many detentions caused by serious defects relating to propulsion engine and auxiliary engine, engine room ventilation fire dampers, air pipe, OWS, hatch cover, life/rescue boat, sewage treatment plant, emergency generator and heat insulation materials, etc. Each ship company should enhance supervise ship's crew members to carry out proper maintenances and inspection tests to ship's key equipment and high frequency PSC detainable deficiency items, to carry out pre-inspection before arrival carefully and to prevent any PSC detention.
- In the third quarter of this year, 2 ships were detained by PSC due to serious MLC deficiencies. Ship company should implement MLC requirement carefully, pay more attentions to each seafarer SEA, salary payment and working days onboard the ship, etc., to prevent ship detention due to serious MLC deficiencies.
- Many deficiencies relating to ship's maintenances were proposed during PSC inspection and FSI, even some ships were detained due to serious deficiencies, such as engine room or equipment oily, oil/water leakages, equipment corrossions, fire doors and skylights were kept open condition, heat insulation materials were lost or broken, furniture damages, garbage and kitchen/provision store room untidy, etc. So, ship company should enhance supervising to ship maintenances for preventing PSC/FSI deficiency and detention.

Classed Ship in Service Department of CCS Headquarters

Oct. 30, 2020