

Isle of Man Ship Registry Port State Control



Information Notice 1-2021

Issued Apr 2021

The purpose of this notice is to advise Managers and Masters of information concerning Port State Control inspections and activities affecting Isle of Man ships worldwide.

A Port State Control (PSC) inspection is a right of a PSC authority to check visiting foreign ships in order to verify compliance with international rules on safety, pollution prevention and seafarer's living and working conditions.

PSC is a means of enforcing compliance in cases where the ship-owner and Flag State have failed in their responsibility to implement or ensure compliance. Thus, the aim of PSC is the elimination of "sub-standard" ships. The Port State authority can require defects to be put right, and if necessary, detain ships for this purpose. PSC is therefore a port state's defence against visiting substandard shipping.

Technical managers are encouraged to forward this notice to Masters of Isle of Man registered ships in their fleet.

Isle of Man Ship Registry – marine.survey@gov.im – happy to help.

For questions concerning statutory requirements relating to Isle of Man registered ships please email Isle of Man Ship Registry. This email is monitored continuously and the survey team will endeavour to respond as soon as possible.

Whenever a PSC inspection has been completed, we kindly ask you to email all PSC inspection reports to [Isle of Man Ship Registry](#) as soon as practicable.

Isle of Man COVID19 guidance – refer to [Technical Advisory Notice 02-2020](#)
(General, Seafarer's Certification and Minimum Safe Manning, MLC Implications, Survey & Certification, FAQs)



Important note concerning Seafarer Employment Agreements (SEAs)

During the COVID19 pandemic seafarers are facing increasing difficulties with repatriation and as such may be asked to extend their period of service on board. As a result SEAs, as required by the Maritime Labour Convention, are coming under increased scrutiny by PSC.

Some PSC regions or authorities will not accept extension of the period of service on board beyond 11 months. Some countries will not accept at all and some countries will not accept unless authorized (*authorized by Isle of Man Ship Registry*) on a case-by-case basis when strictly necessary to face the emergency situation created by the pandemic, and only with the seafarer's consent.

Please refer to Isle of Man [Technical Advisory Notice 02-2020 Section 4.2](#) and applicable PSC regional COVID19 guidance notes (see web links in section 1 of this document).



Guidance for Masters should you receive a deficiency during a PSC inspection.

If you agree with the deficiency raised then agree a practical corrective action plan with the PSC Officer. This should be reflected in the deficiency's "action taken" coding stated on the Form B.

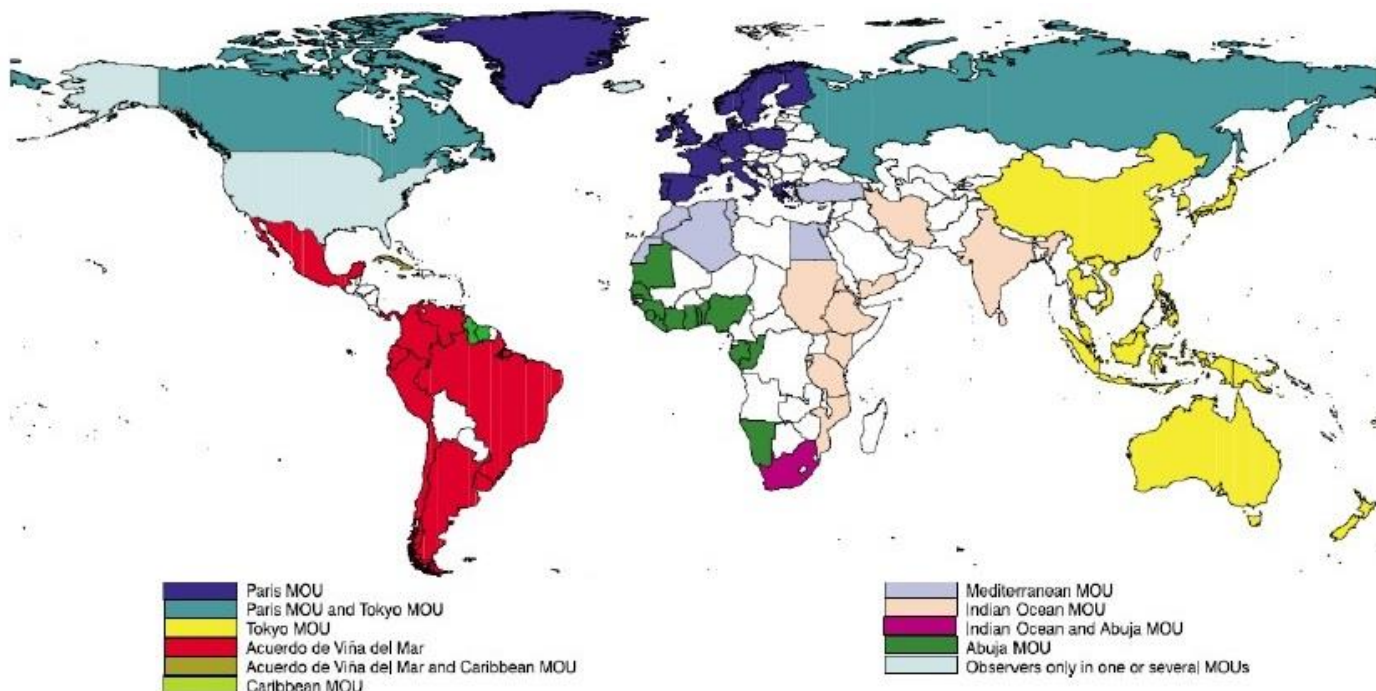
If you do not agree with the deficiency raised consider challenging the PSC officer before he/she leaves the vessel to clarify the statutory requirement and its implementation on board. Rectification later is usually much more difficult to achieve. Most PSC Officers expect to be challenged by the Master.

In addition to the above, if the PSC Officer wishes to **detain** the vessel;

- Call the technical management company or Isle of Man Ship Registry (+44 1624 688500 office hours or +44 7624 493467 out of hours) for assistance if required **before the PSC Officer leaves the vessel.**
- Ask the PSC Officer for a copy of the appeal procedure.



Port State Control Regions



Useful websites for PSC MoU (Memorandum of Understanding) Information:

Black Sea MOU	www.bsmou.org	Riyadh MOU	www.riyadh mou.org
Paris MOU	www.parismou.org	United States Coast Guard	cgmix.uscg.mil/PSIX
Indian MOU	www.iomou.org	Latin America MOU	www.acuerdolatio.int.ar
Mediterranean MOU	www.medmou.org	Caribbean MOU	www.caribbeanmou.org
Tokyo MOU	www.tokyo-mou.org	West and Central Africa MOU	www.abujamou.org

Remember...

- All statutory equipment on board must be maintained in full working order capable of being used and demonstrated at any time regardless if it is being used for operations or not.
- If you are aware of any defects or equipment failures concerning statutory equipment then address these through the ship's defect reporting system and inform Isle of Man Ship Registry and the Classification Society as necessary. Temporary dispensation from Isle of Man Ship Registry may be required to allow for repairs.
- Should a Port State Control Officer board the vessel the Isle of Man Ship Registry advises informing the PSC Officer of any defects at the beginning of the inspection and demonstrate what steps have been taken to address the defects.
 - If this is not done the PSC Officer may incorrectly assume the ship staff are either not aware of the defect items or are lying about it – either way this is bad for the ship.
- If additional equipment has been fitted in excess of the statutory requirements the Isle of Man Ship Registry recommends this equipment is maintained in full working order or clearly signed the equipment is not to be used.



1. Isle of Man Performance

The International Chamber of Shipping has published its 2020/2021 Shipping Industry Flag State Performance Table. The Flag State Performance Table is based on the most up-to-date data available as of January 2021. The Table summarises factual information in the public domain that might be helpful in assessing the performance of flag States.

	Port State Control					Ratification of Conventions							RO Code	Age	Reports		IMO		
	Paris MOU White List	Not on Paris MOU Black List	Tokyo MOU White List	Not on Tokyo MOU Black List	USCG Qualship 21	USCG Target List (safety)	SOLAS 74 (and 88 Protocol)	MARPOL including Annexes I - II	MARPOL Annexes III - VI	LL 66 (and 88 Protocol)	STCW 78	ILO MLC	OLC/FUND 92	Recognized Organizations	Low Average Age (Ship Numbers)	On latest STCW 95 'white list'	Completed full ILO Reports	IMO Meetings Attendance	IMO Audit Scheme
- Isle of Man	■	■	■	■	■	■	UK	UK	UK	UK	UK	UK	UK	■	■	UK	UK	■	■

■ squares suggest positive performance indicators

UK – Indicates where a dependent territory's entry is based on the ratification, reporting or IMO meeting attendance of the UK 'mainland' flag.

For more information - www.ics-shipping.org/wp-content/uploads/2021/01/Flag-State-Table-2021.pdf

2. MOU Regional Information

Paris MoU:

- The Isle of Man has '**White List**' status as of the latest [2019 Paris MoU Performance List](#).
- [Paris MOU 2019 Annual Report](#).
- Classification Societies recognised by Isle of Man (see MSN020) have [a low risk](#).
- [Paris MoU COVID19 Guidance](#)

Tokyo MoU:

- The Isle of Man has '**White List**' status as of the latest [2019 Tokyo MoU Annual report](#).
- In accordance with the Tokyo MOU's Inspection Regime procedures the Isle of Man also has "Low Risk Ship" status as published on the Tokyo MOU website.
- Classification Societies recognised by Isle of Man have a performance level of "High" and have also attained "Low Risk" status as published on the Tokyo MOU website.
- [Tokyo MoU COVID19 Guidance](#)

[Guidance on Remote PSC Inspections](#)

[Tokyo MOU Safety Bulletins](#)

United States Coast Guard (USCG):

- The Isle of Man Ship Registry has achieved the required Flag State status for those ships wishing to enroll on the USCG's **Qualship 21** and **E-Zero** programs subject to additional eligibility criterion being met as of the latest [2019 USCG Annual Report](#).
- The Isle of Man Ship Registry has also achieved the required Flag State status for a low target score on the USCG Security Compliance Matrix as of the 2019 USCG Annual Report.
- Classification Societies recognised by Isle of Man have a detention ratio of <2% and are therefore not targeted for Priority 1 PSC inspections.
- [USCG COVID19 Guidance](#)

[USCG Safety Alerts and Safety Advisories](#)



Black Sea MoU:

- [2019 Annual Report](#)

Mediterranean MoU:

- [2019 Annual Report](#)

Indian Ocean MoU:

- [Indian Ocean MoU COVID19 Guidance](#)
- [2019 Annual Report](#)

Caribbean MoU:

- [Caribbean MoU COVID19 Guidance](#)
- [2019 Annual Report](#)

Riyadh MoU:

- [2019 Annual Report](#)

Abuja MoU:

- [2019 Annual Report](#)



3. PSC Detention deficiencies (last 12 months) – All PSC MOU Regions

All statutory equipment on board must be maintained in full working order capable of being used and demonstrated at any time regardless if it is being used for ship operations or not.

The following inspection areas represent deficiencies that resulted in detention on Isle of Man registered ships in the last 12-month period Q2 2020 – Q1 2021 (inclusive) in all MOU regions. The below does not represent the number of ships detained, in some cases a single item and in other cases multiple items have resulted in the ship's detention.

012 - Certificates & Documentation - Crew Certificate

- Seafarers serving on board for longer than 14 months since they joined the vessel. Their initial SEA's are expired and extensions were signed, however these extensions were expired the day before the PSC inspection. Found at least one other crew member with both initial SEA and extension expired. No plan for repatriation could be shown during inspection.
- Vessel found under-manned and not in accordance with minimum manning document.

013 – Certificates & Documentation

- Vessel loaded with a cargo which may liquefy without being provided by the Shipper or representative with a document issued by the competent authority stating that the Shipper's procedures to ensure that moisture content is less than the TML as per IMSBC code requirements is approved.
- Shipper's declaration (for bulk cargo) issued with inaccurate BCSN name.

03 - Water/Weathertight condition

- Fuel oil vent found with holes and several ballast tank air-vent closing arrangements found defective.

07 – Fire Safety

- Several fire dampers found not closing properly.
- Oil leaks found on auxiliary engines including oil leaks at injector pumps and cylinder heads.
- Oil accumulation of oil and oily rags in several parts of the engine room with special attention to generators, bilges, heavy fuel oil tank and diesel oil settling tank.
- Hypermist system set to manual mode while engine room operating as unmanned.
- Fire detector heads covered with plastic bag in engine room.
- Fire drill could be conducted because of lack of crew on board.

10 – Navigation

- OOW unable to demonstrate the route position fixing and route monitoring on the ECDIS.
- BNWAS found inoperative

15 – ISM

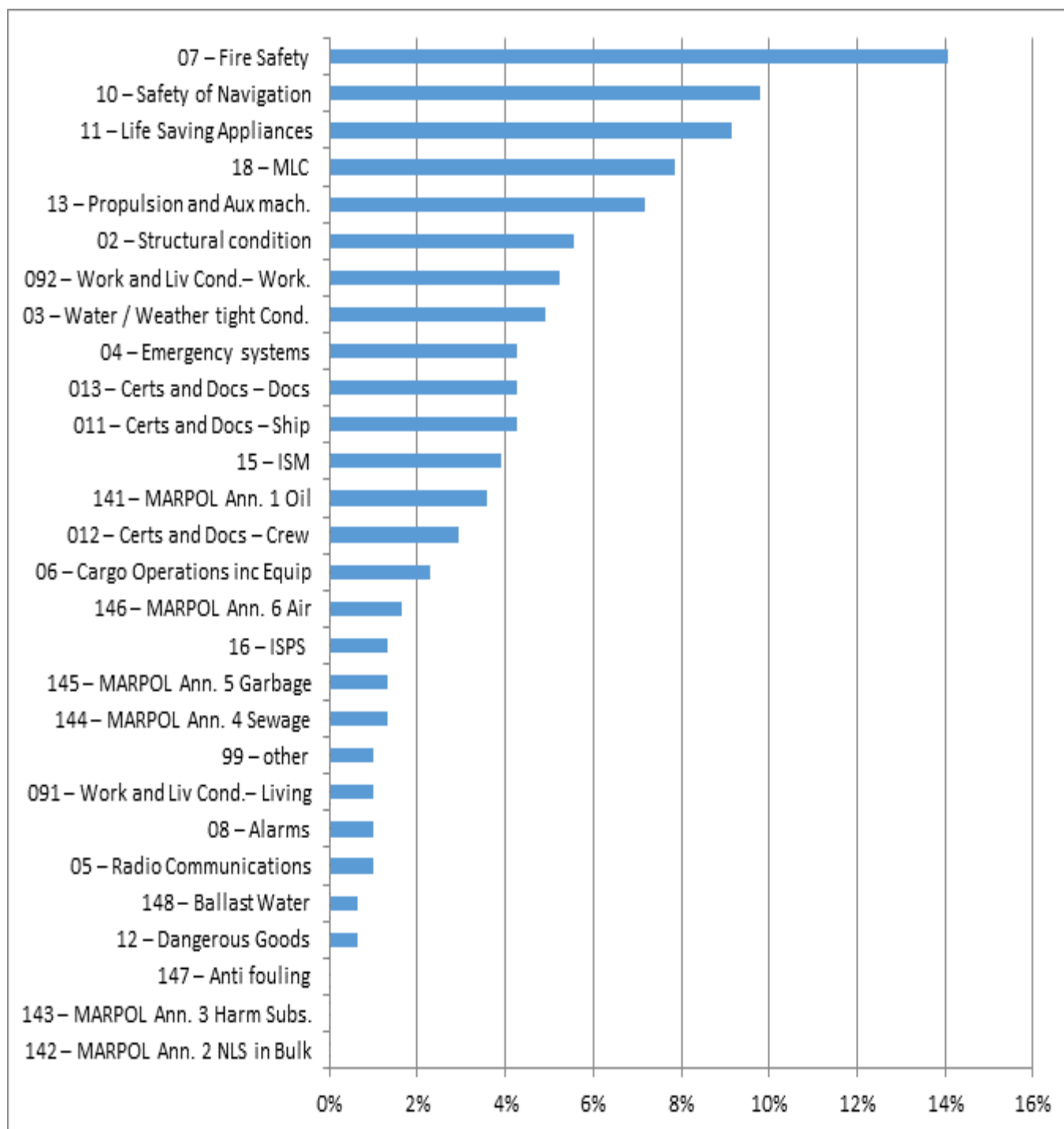
- The ISM system is not adequately implemented on board.
- The ISM system for effective maintenance and defect reporting is not effectively implemented on board.

In cases of detention the ship is not permitted to sail until an effective action plan has been agreed with the local PSC authority.



4. PSC Deficiencies (last 12 months) – All PSC MOU Regions

The following chart represents deficiencies requiring corrective action raised in all MOU Regions expressed as a percentage of the total deficiencies in the last 12-month period Q2 2020 – Q1 2021 (inclusive):



As part of the Isle of Man Ship Registry's commitment to reducing Port State Control (PSC) deficiencies Isle of Man Ship Registry produces anonymous monthly statistics and information concerning PSC deficiencies issued per port in each of the different MOU Regions.

The monthly statistics are emailed to companies in .XLS format. (If you have not received this email please contact the IOM Ship Registry.)

The Isle of Man Ship Registry hopes that by sharing this information companies and masters can benefit from other ship's experiences and avoid similar deficiencies being issued.



5. PSC Deficiencies by Code (last 12 months) – All PSC MOU Regions

The following table represents the most common deficiency items raised by code (Paris MOU coding system) with examples of deficiencies raised ($\geq 1.3\%$) in the last 12-month period Q2 2020 – Q1 2021 (inclusive) in all MOU regions. It is recommended masters and technical managers pay special attention for any defects on board in the areas identified.

%	Def Code	Deficiency Description
2.9%	15150	ISM Maintenance system and defect reporting system not implemented effectively, numerous deficiencies are indicative ISM system is not effectively implemented. Additional external/internal audits to be undertaken.
2.0%	4103	Emergency lighting, batteries and switches Emergency lights not working as required, deck lights with water ingress, electric cable layout found unsafe.
2.0%	10109	Lights, shapes, sound signals. Masthead light defective, Sternlight arc incorrect, signal lights inoperative, anchor ball missing, bell missing.
2.0%	13101	Propulsion main engine Transformer out of service, air start system defective, oil sensor failures, ME governor defective, water leakage on main engine cylinders
2.0%	13199	Other (machinery) Cement boc placed over overboard valve, steering gear clearance not as per manufacturers guidelines, sea water pipes serving fresh water coolers blanked off, water pipes temporary repairs unacceptable, purifier oil leakage, water pipes leaking
1.6%	1220	Seafarer Employment Agreement SEA SEA expired, seafarers paid incorrect wages according to their SEA, terms and conditions found not in compliance with MLC, found seafarers on board longer than 14 months.
1.6%	3102	Freeboard marks Marking found missing or not distinct from hull colour
1.6%	6199	Other (cargo) Emergency shut down failed to activate satisfactorily, crane limit switches defective, stanchions found in poor condition.
1.6%	7105	Fire doors/openings in fire-resisting divisions Fire door not latching closed, fire door held open, fire door not closing fully, fire door fitted with hold back device instead of self-release device.
1.6%	7108	Ready availability of fire fighting equipment Fire nozzle inoperative, fresh water tank for hypermist system found low, all portable extinguishers ashore for service, fire head detectors covered with bags, dry powder boxes found tied shut.
1.6%	7110	Fire fighting equipment and appliances Fire insulation found missing, foam applicators found not stowed as per fire plan, fire hoses found in poor condition, cargo area water spray nozzle found defective.



1.6%	10127	Voyage of passage plan Plan inadequate, not berth to berth or found missing
1.6%	11104	Rescue boats Engine unable to start, Launching device found in poor condition, Electrics and lights defective, engine not starting correctly, water ejector found with a hole, air system defective, retroreflective material missing, valve defective, safety belts defective.
1.6%	11131	On board training and instructions Lack of familiarity with fire equipment during fire drill, key personnel not familiar with start arrangements for rescue boat, lifeboat/liferaft launching instructions not posted, lifeboat not manoeuvred in the water in the last 3 months.
1.3%	2108	Electric equipment in general
1.3%	2199	Other (structural condition)
1.3%	7115	Fire-dampers
1.3%	7126	Oil accumulation in engine room
1.3%	10103	Radar
1.3%	11101	Lifeboats
1.3%	13102	Auxiliary engine
1.3%	14501	Garbage
1.3%	18299	Other - (Conditions of employment)
1.0%	1123	Continuous synopsis record
1.0%	1214	Endorsement by Flag State
1.0%	2112	Hull - corrosion
1.0%	3103	Railing, gangway, walkway and means for safe passage
1.0%	4114	Emergency source of power / Emergency generator
1.0%	7114	Means of control (opening/closure skylights, pumps, etc.) - Machinery Spaces
1.0%	7116	Ventilation
1.0%	9209	Electrical
1.0%	9232	Cleanliness of engine room
1.0%	10112	Electronic charts (ECDIS)
1.0%	11117	Lifebuys including provision and disposition
1.0%	14108	15 PPM alarm arrangements
1.0%	14402	Sewage treatment plant
1.0%	15106	Shipboard operations
1.0%	16105	Access control to ship
0.7%	1117	Prevention of pollution by oil (IOPP)
0.7%	1305	Logbooks/compulsory entries
0.7%	1308	Records of rest - Records of seafarer's daily hours of work or rest
0.7%	1309	Fire control plan - all
0.7%	1316	Cargo information
0.7%	2117	Decks - corrosion
0.7%	3107	Doors
0.7%	3108	Ventilators, air pipes, casings
0.7%	5116	Operation/maintenance
0.7%	7111	Personal equipment
0.7%	7120	Means of escape
0.7%	7123	Operation of Fire protection systems
0.7%	7125	Evaluation of crew performance (fire drills)
0.7%	7199	Other (fire safety)
0.7%	9109	Pipes, wires (insulation)
0.7%	10105	Magnetic compass
0.7%	10199	Other (navigation)



0.7%	11113	Launching arrangements for rescue boats
0.7%	11118	Lifejackets
0.7%	11124	Embarkation arrangements survival craft
0.7%	11199	Other (life saving)
0.7%	13103	Gauges, thermometers, etc.
0.7%	13104	Bilge pumping arrangements
0.7%	13108	Operation of machinery
0.7%	14105	Pumping, piping and discharge arrangements for oil tankers
0.7%	14199	Other (MARPOL - Annex -I)
0.7%	14608	Incinerator, including operations and operating manual
0.7%	14802	Ballast Water Record Book
0.7%	18321	Heating, Air Conditioning and Ventilation
0.7%	18324	Cold Room, Cold Room Cleanliness, Cold Room Temperature
0.7%	18408	Electrical
0.7%	18416	Ropes and Wires

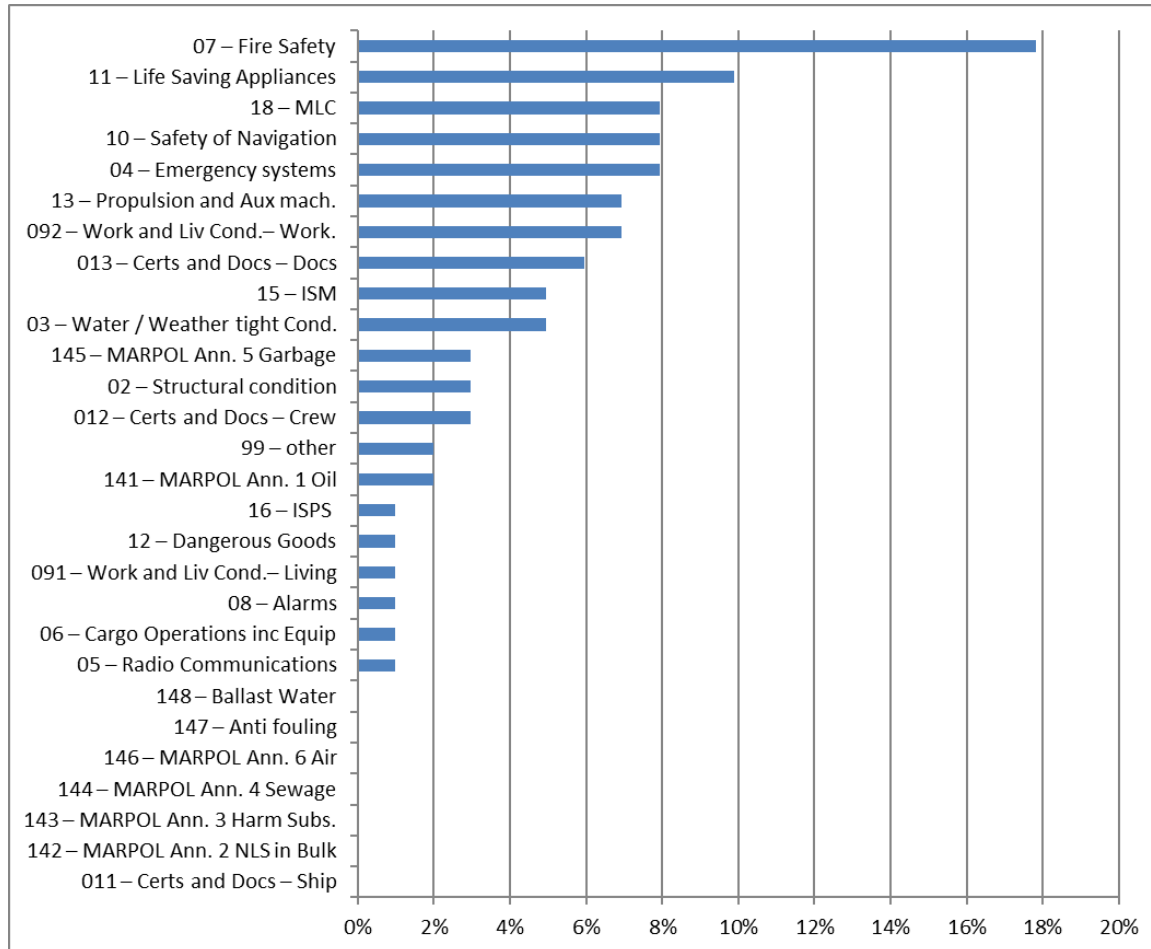


6. PSC Deficiencies by Ship Type (last 12 months) – All PSC MOU Regions

The following tables and charts represent the most common deficiency items raised by code (Paris MOU coding system) per ship type in the last 12-month period Q2 2020 – Q1 2021 (inclusive) in all MOU regions – Bulk carriers, Gas carriers, Oil tankers, Oil/Chemical tankers, Offshore vessels, Other ships, Yachts.

Bulk Carriers

Overall Deficiency Trend



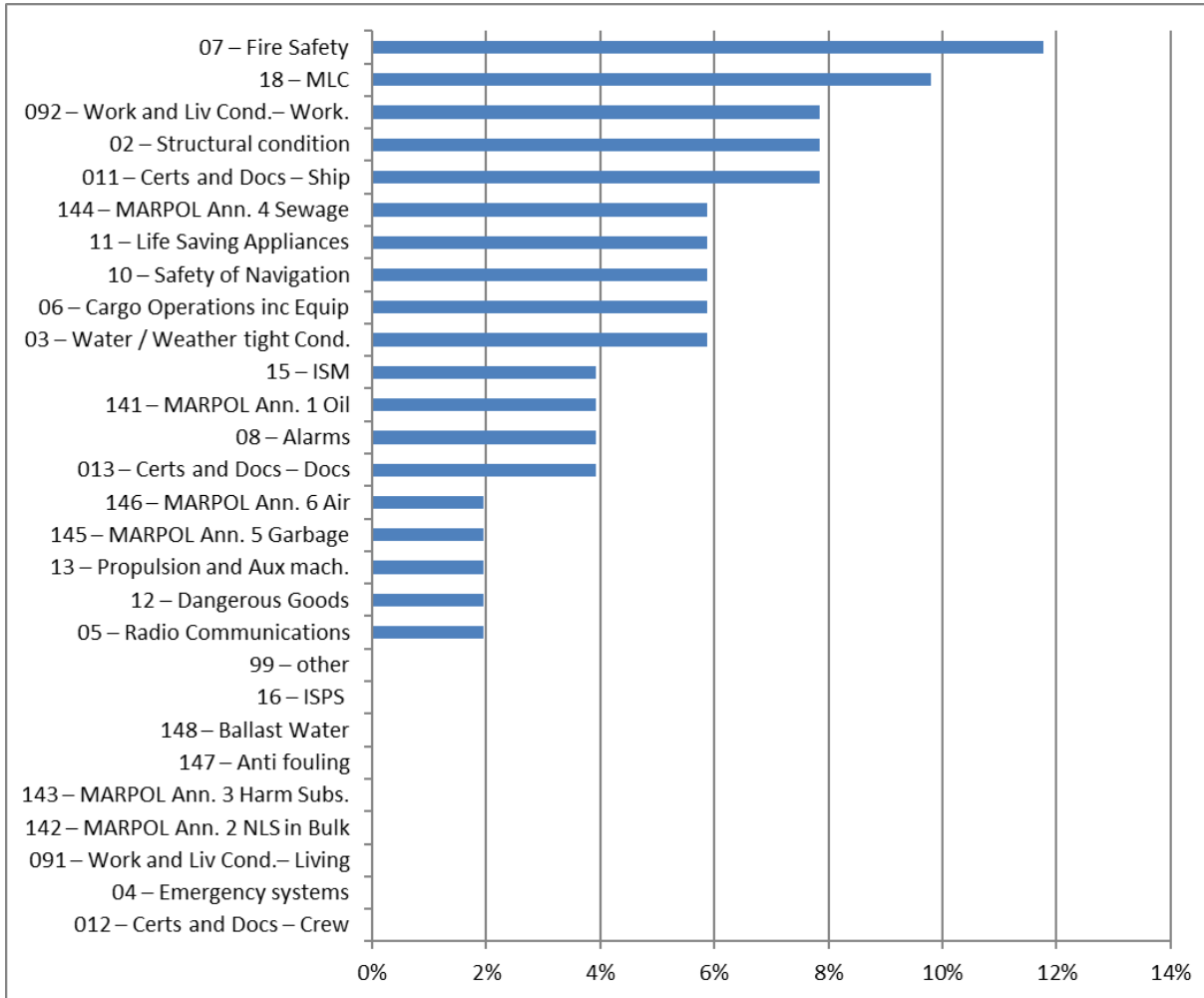
Most frequent def. codes >1.0% of Bulk inspns

%	Code	Description
4.9%	15150	ISM
3.9%	13199	Other (machinery)
2.9%	1220	Seafarer Employment Agreement SEA
2.9%	4103	Emergency lighting, batteries and switches
2.9%	7105	Fire doors/openings in fire-resisting divisions
2.9%	7108	Ready availability of fire fighting equipment
2.9%	7110	Fire fighting equipment and appliances
2.9%	14501	Garbage
2.9%	18299	Other - (Conditions of employment)
1.9%	1316	Cargo information
1.9%	3103	Railing, gangway, walkway and means for safe passage
1.9%	4114	Emergency source of power / Emergency generator
1.9%	7111	Personal equipment
1.9%	7114	Means of control (opening/closure skylights, pumps, etc.) - Machinery Spaces
1.9%	9232	Cleanliness of engine room
1.9%	10103	Radar
1.9%	10109	Lights, shapes, sound signals.
1.9%	11104	Rescue boats
1.9%	11117	Lifebuys including provision and disposition
1.9%	11131	On board training and instructions
1.9%	14108	15 PPM alarm arrangements
1.9%	99101	Other safety in general



Gas Carriers

Overall Deficiency Trend



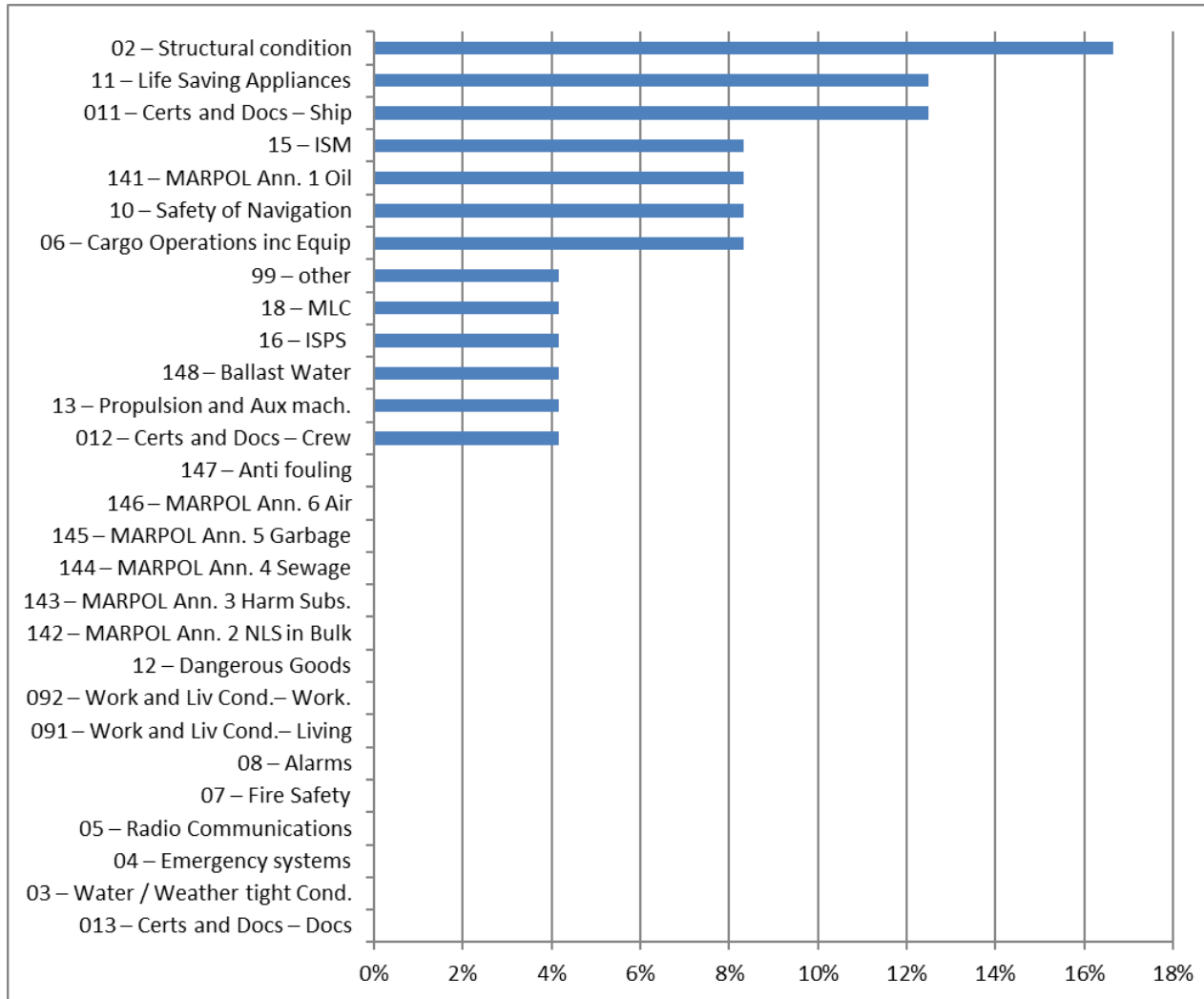
Most frequent def. codes >2.0% of Gas inspns

%	Code	Description
3.9%	2108	Electric equipment in general
3.9%	6199	Other (cargo)
3.9%	10103	Radar
3.9%	14402	Sewage treatment plant



Oil Tankers

Overall Deficiency Trend



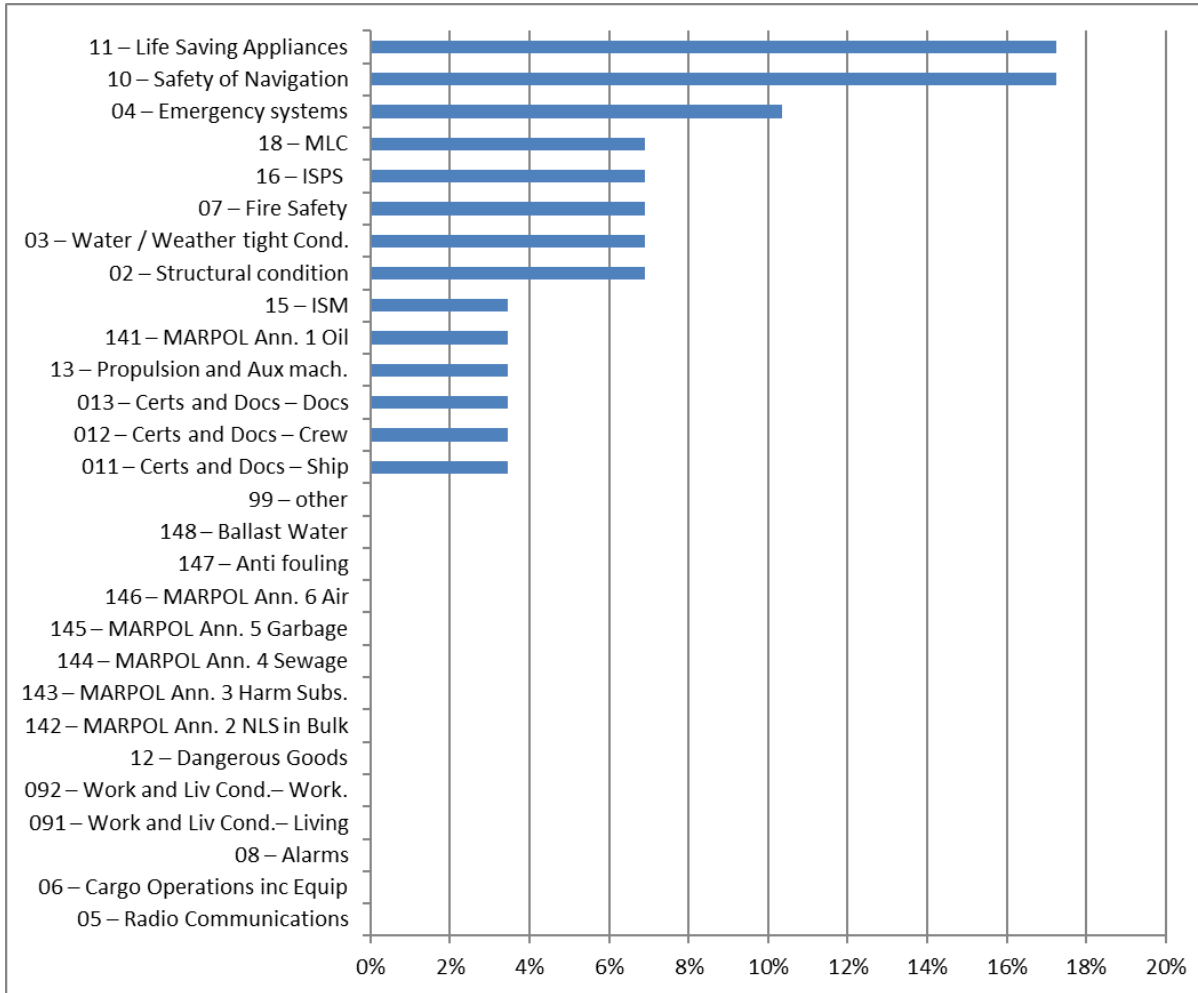
Most frequent def. codes 4.2% of Oil inspns

%	Code	Description
4.2%	1123	Continuous synopsis record
4.2%	1132	Tonnage certificate
4.2%	1140	Declaration of Maritime Labour Certificate (DMLC Part I or Part II)
4.2%	1214	Endorsement by Flag State
4.2%	2112	Hull - corrosion
4.2%	2119	Enhanced survey programme (ESP)
4.2%	2124	Cargo pump room/handling spaces
4.2%	2199	Other (structural condition)
4.2%	6106	Cargo transfer - Tankers
4.2%	6199	Other (cargo)
4.2%	10109	Lights, shapes, sound signals.
4.2%	10112	Electronic charts (ECDIS)
4.2%	11101	Lifeboats
4.2%	11117	Lifebuoys including provision and disposition
4.2%	11118	Lifejackets
4.2%	13101	Propulsion main engine
4.2%	14101	Control of discharge of oil
4.2%	14106	Pump room bottom protection
4.2%	14802	Ballast Water Record Book
4.2%	15106	Shipboard operations
4.2%	15150	ISM
4.2%	16105	Access control to ship
4.2%	18424	Steam pipes, pressure pipes, wires (insulation)
4.2%	99103	Other (MARPOL operational)



Oil/Chemical Tankers

Overall Deficiency Trend



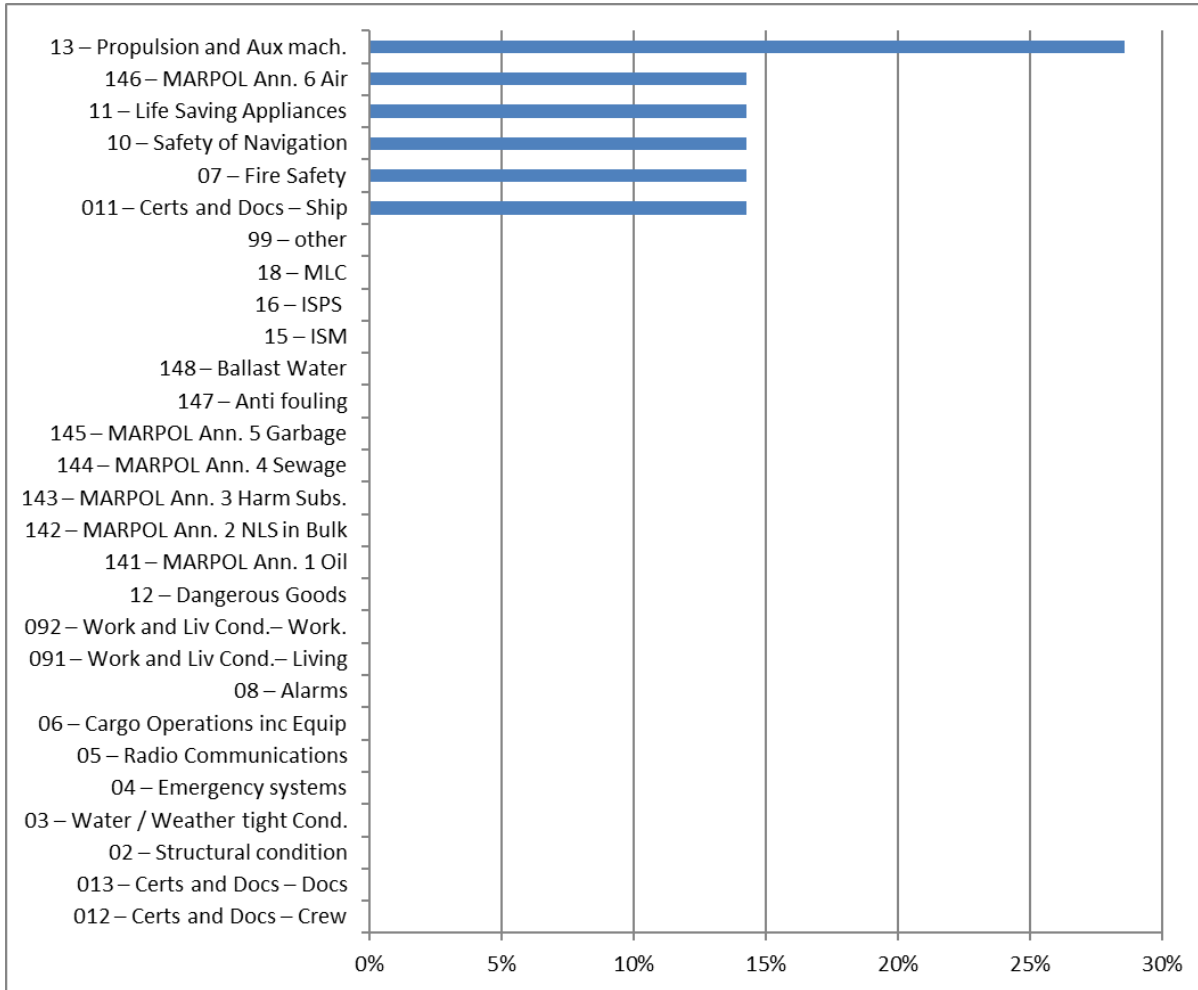
Most freq def. codes >3.0% of Oil/Chem inspns

%	Code	Description
10.0%	10109	Lights, shapes, sound signals.
10.0%	11131	On board training and instructions
6.7%	2112	Hull - corrosion
6.7%	3102	Freeboard marks
6.7%	4103	Emergency lighting, batteries and switches
6.7%	16105	Access control to ship
3.3%	1102	Cargo ship safety construction (including exemption)
3.3%	1214	Endorsement by Flag State
3.3%	1220	Seafarer Employment Agreement SEA
3.3%	1308	Records of rest - Records of seafarer's daily hours of work or rest
3.3%	4110	Abandon ship drills
3.3%	7110	Fire fighting equipment and appliances
3.3%	7115	Fire-dampers
3.3%	10112	Electronic charts (ECDIS)
3.3%	10199	Other (navigation)
3.3%	11101	Lifeboats
3.3%	11104	Rescue boats
3.3%	13103	Gauges, thermometers, etc.
3.3%	14199	Other (MARPOL - Annex -I)
3.3%	15150	ISM
3.3%	18317	Food personal hygiene
3.3%	18418	Winches and Capstans



Offshore vessels

Overall Deficiency Trend



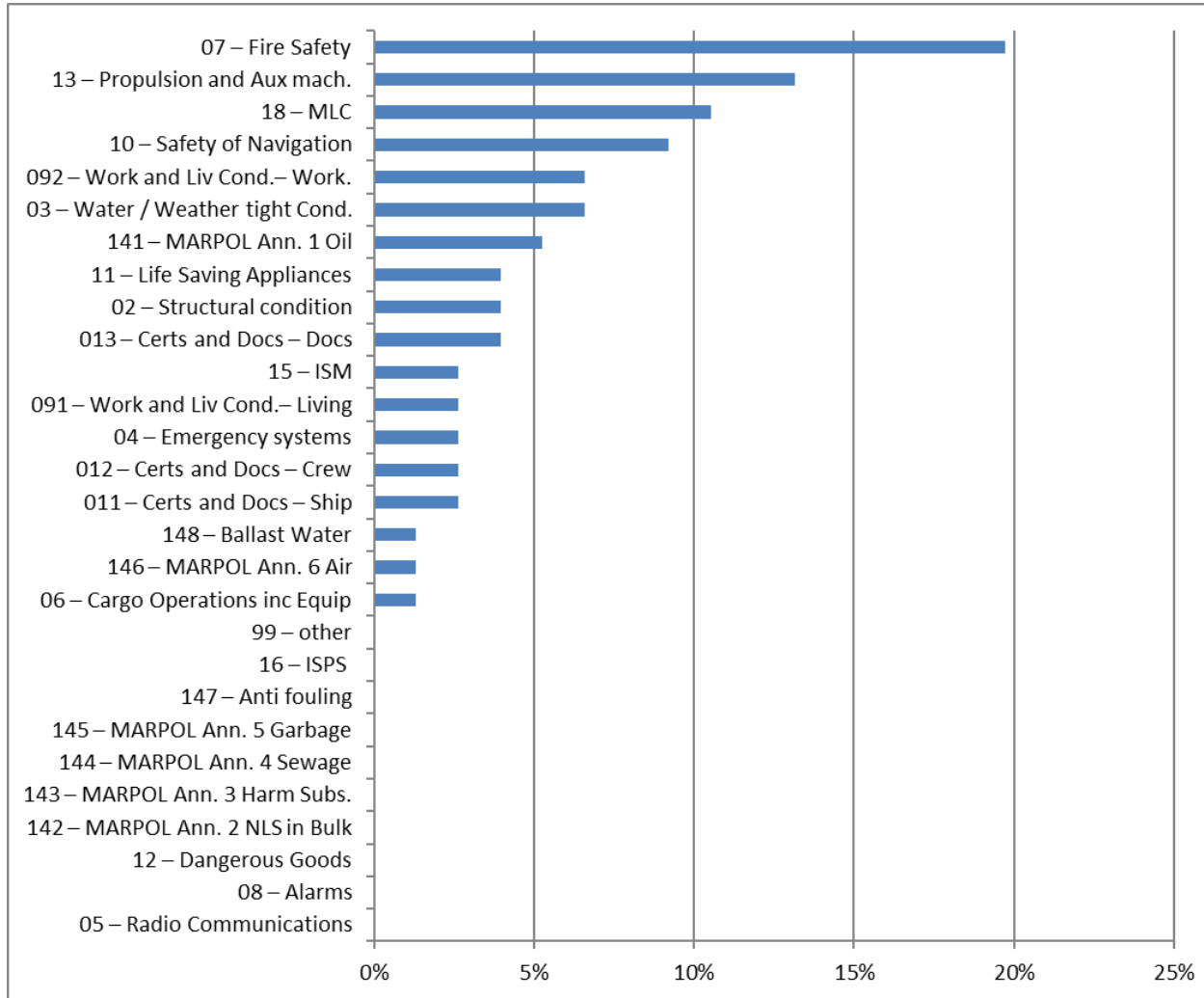
Most freq def. codes >14.0% of Offshore insps

%	Code	Description
28.6%	13101	Propulsion main engine
14.3%	1104	Cargo ship safety radio (including exemption)
14.3%	7120	Means of escape
14.3%	10105	Magnetic compass
14.3%	11118	Lifejackets
14.3%	14608	Incinerator, including operations and operating manual



Other Cargo ships

Overall Deficiency Trend



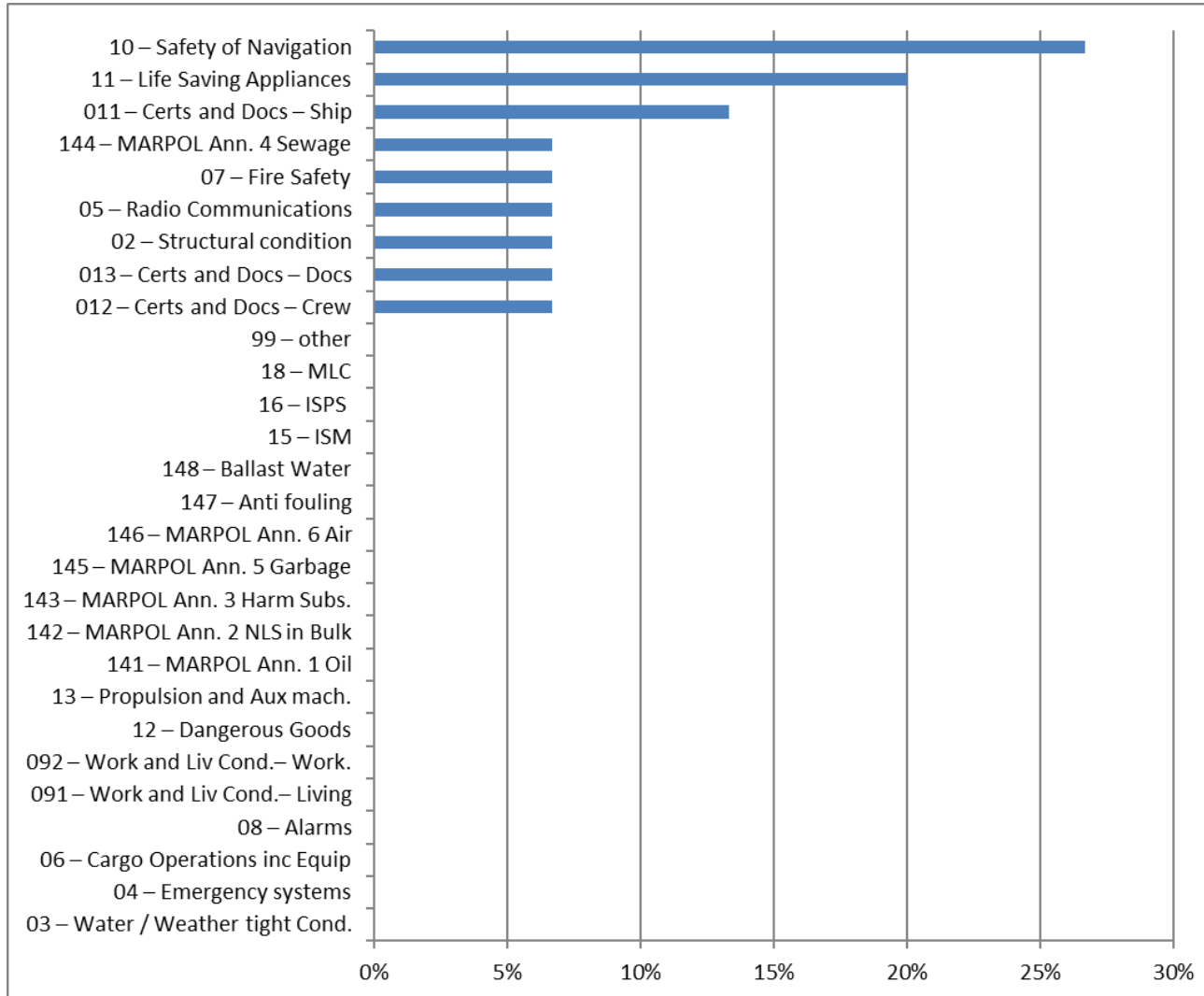
Most freq def. codes >1.3% of Other inspns

%	Code	Description
5.3%	7126	Oil accumulation in engine room
3.9%	3102	Freeboard marks
3.9%	10127	Voyage of passage plan
3.9%	13102	Auxiliary engine
2.6%	1309	Fire control plan - all
2.6%	7115	Fire-dampers
2.6%	7123	Operation of Fire protection systems
2.6%	9209	Electrical
2.6%	13101	Propulsion main engine
2.6%	13104	Bilge pumping arrangements
2.6%	13199	Other (machinery)
2.6%	14105	Pumping, piping and discharge arrangements for oil tankers
2.6%	18416	Ropes and Wires



Yachts

Overall Deficiency Trend



Most freq def. codes 6.7% of Yacht inspns

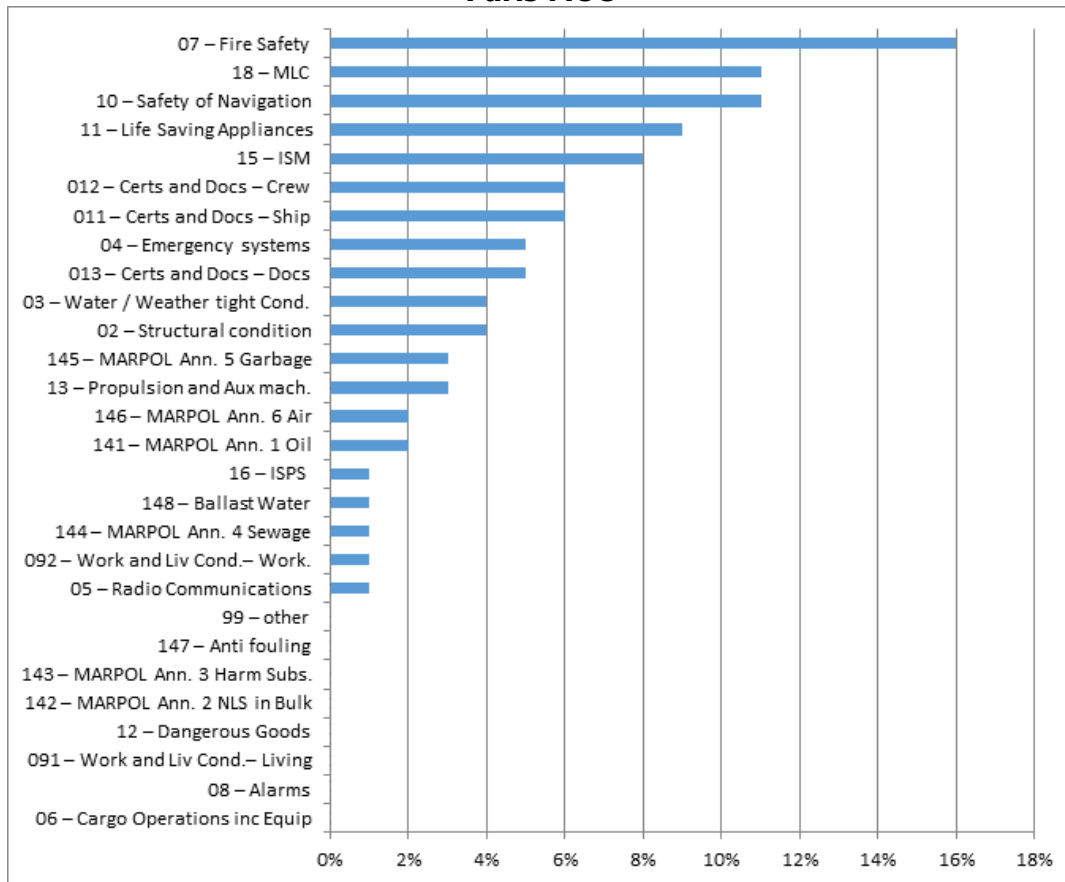
%	Code	Description
6.7%	1113	Minimum safe manning document
6.7%	1117	Prevention of pollution by oil (IOPP)
6.7%	1209	Manning specified by the minimum safe manning document
6.7%	1315	Oil record book
6.7%	2199	Other (structural condition)
6.7%	5107	Maintenance/duplication of equipment
6.7%	7125	Evaluation of crew performance (fire drills)
6.7%	10111	Charts
6.7%	10112	Electronic charts (ECDIS)
6.7%	10127	Voyage of passage plan
6.7%	10138	Bridge Navigational Watch Alarm System (BNWAS)
6.7%	11110	Stowage of liferafts
6.7%	11128	Line throwing appliance
6.7%	11199	Other (life saving)
6.7%	14402	Sewage treatment plant



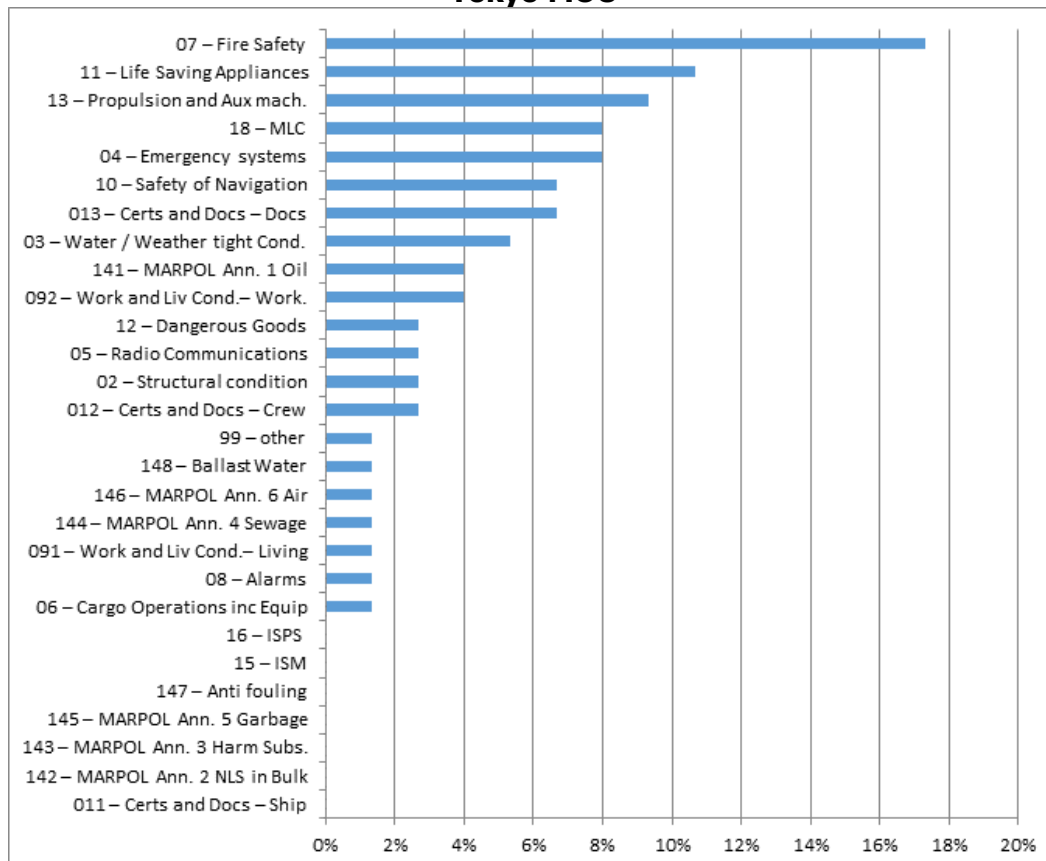
7. PSC Regional Deficiencies (last 12 months)

The following charts represent deficiencies raised in an MOU Region expressed as a percentage of the total deficiencies in the last 12-month period Q2 2020 – Q1 2021 (inclusive):

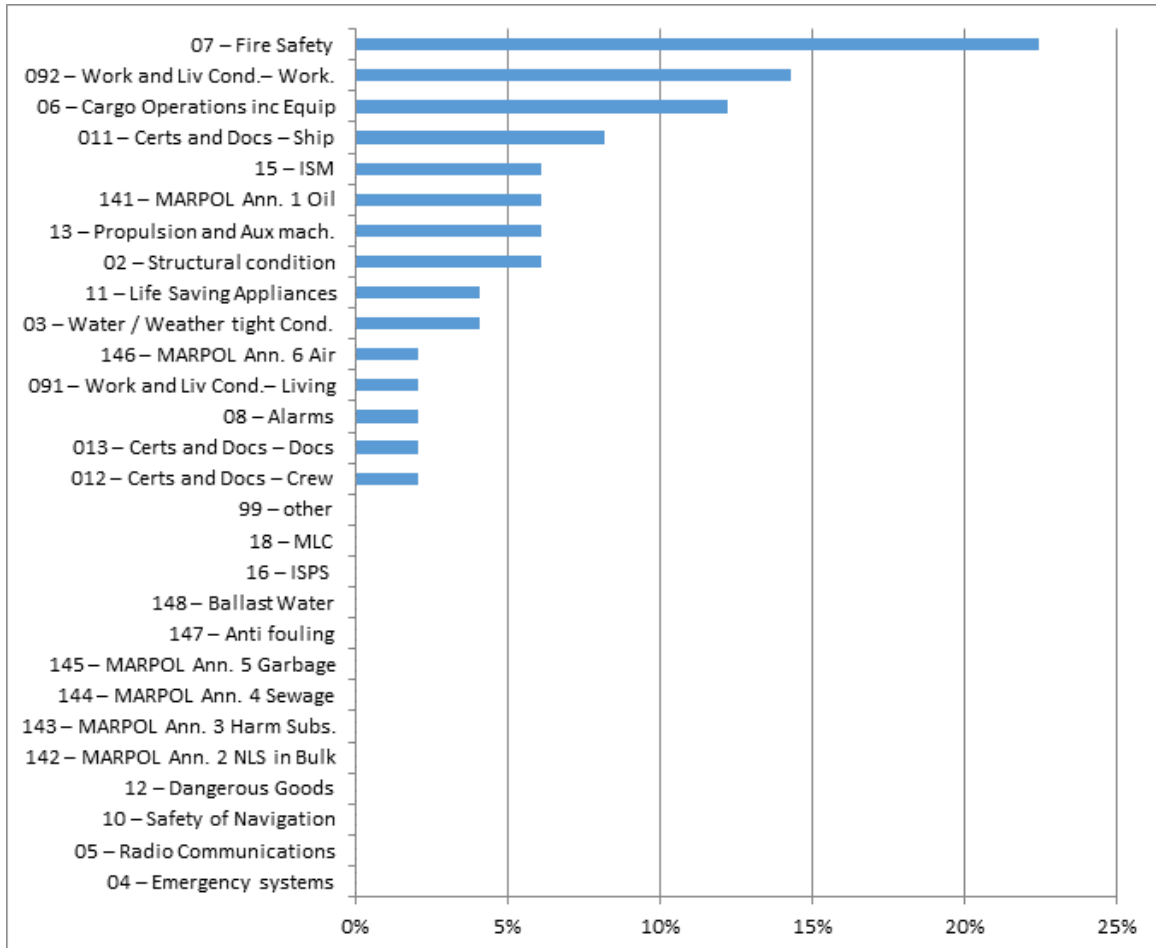
Paris MOU



Tokyo MOU



United States Coast Guard



Black Sea MOU

