

Isle of Man Ship Registry Port State Control

Information Notice 4-2021

Issued October 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.



COVID19 guidance – refer to [Technical Advisory Notice 02-2020](#)

As a result of a recent ship detention we remind technical managers and ship masters - if anyone on board has COVID19 or COVID19-like symptoms please report this to the port authorities prior to arrival in port.



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.

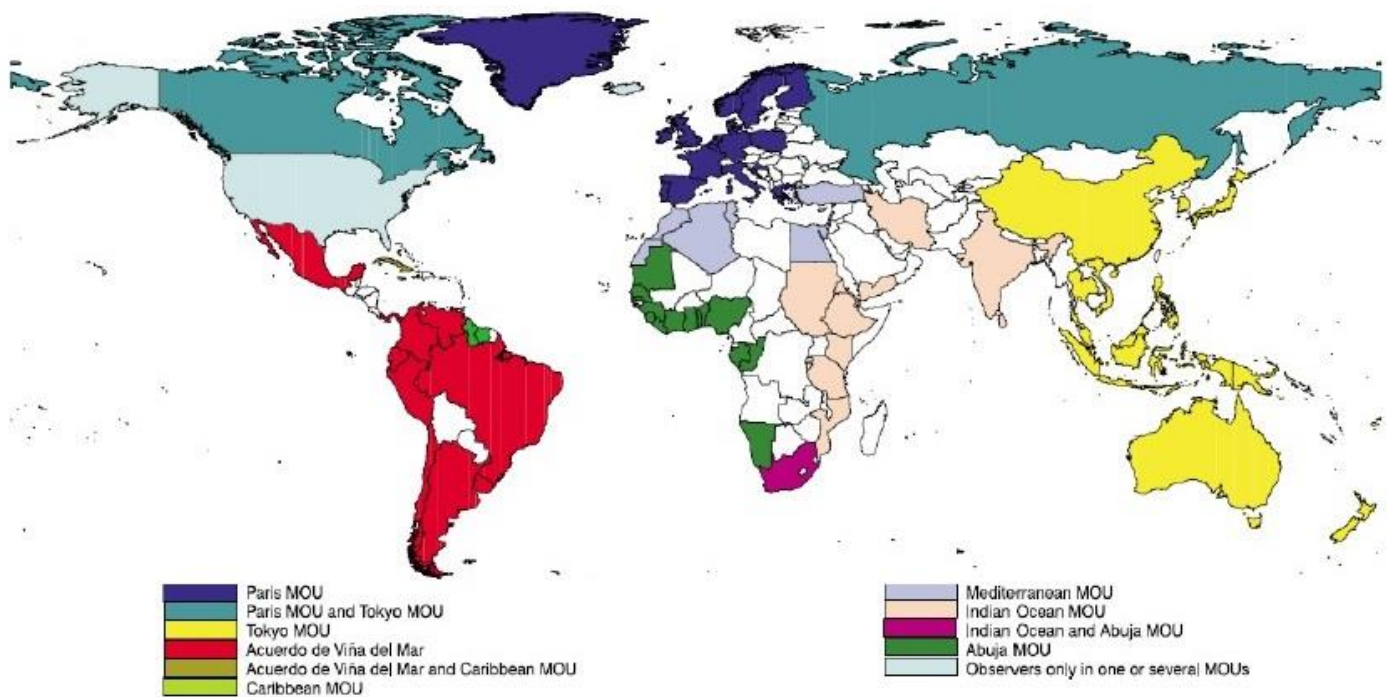
If you agree with the deficiency raised then agree a practical corrective action plan with the PSC Officer. This should be reflected in the deficiency's "action taken" coding stated on the Form B.

If you do not agree with the deficiency raised consider discussing 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.acuerdolatino.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 the 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 [2020 Paris MoU Performance List](#).
- [Paris MOU 2020 Annual Report](#).
- Classification Societies recognised by Isle of Man (see MSN020) have [a low risk](#).
- [Paris MoU COVID19 Guidance](#)
- Concentrated Inspection Campaign – 01 Sep to 30 Nov 2021 – General Stability.

Tokyo MoU:

- The Isle of Man has '**White List**' status as of the latest [2020 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.
- Concentrated Inspection Campaign – 01 Sep to 30 Nov 2021 – General Stability.
- [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 standard 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 [2020 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:

- [2020 Annual Report](#)

Mediterranean MoU:

- [2019 Annual Report](#)

Indian Ocean MoU:

- [Indian Ocean MoU COVID19 Guidance](#)
- [2020 Annual Report](#)

Caribbean MoU:

- [Caribbean MoU COVID19 Guidance](#)
- [2020 Annual Report](#)

Riyadh MoU:

- [2019 Annual Report](#)

Abuja MoU:

- [2020 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 Q4 2020 – Q3 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

- 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.

07 – Fire Safety

- Oil leaks found on auxiliary engines including oil leaks at injector pumps and cylinder heads.
- Hypermist system set to manual mode while engine room operating as unmanned.
- Fire detector heads covered with plastic bags in the engine room.
- Fire drill could be conducted because of lack of crew on board.
- Sample extraction smoke detection system for cargo hold line out of order

10 – Navigation

- BNWAS found inoperative

11 – Life Saving Appliances

- Freefall lifeboat engine unable to start by No2 battery

15 – ISM

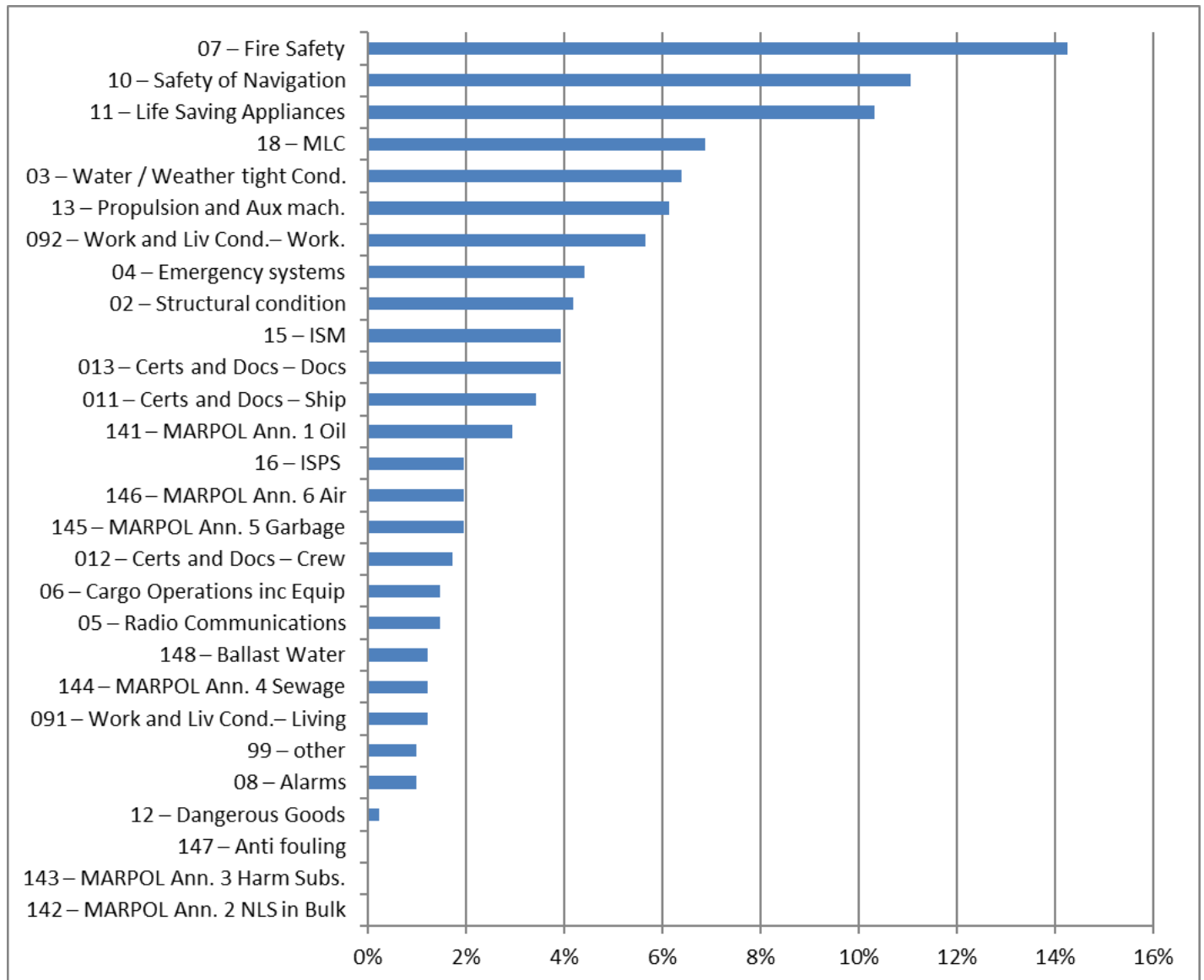
- The ISM system is not adequately implemented on board.
- The ISM system for effective maintenance and defect reporting is not effectively implemented on board.

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 Q4 2020 – Q3 2021 (inclusive):



As part of the Isle of Man’s commitment to reducing Port State Control (PSC) deficiencies, the 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 (>1.2%) in the last 12-month period Q4 2020 – Q3 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.

%	Deficiency Code	Deficiency Description
3.4%	10109	Lights, shapes, sound signals. Light defective, arc incorrect, signal lights inoperative, anchor ball missing, bell missing, morse light inoperative.
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.
2.5%	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.
2.2%	3102	Freeboard marks Marking found missing or not distinct from hull colour
2.2%	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%	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, fire extinguisher not in correct position as per fire plan.
2.0%	11101	Lifeboats Reflective tapes missing, battery failed to start lifeboat engine, charge cable socket defective, release handle in poor condition, window blurred, signage incorrect.
2.0%	11131	On board training and instructions Lack of familiarity with fire equipment, 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, on board training manual incomplete for launching appliances or not in a language understood by all crew members.
1.7%	4103	Emergency lighting, batteries and switches Emergency lights not working as required, deck lights with water ingress, electric cable layout found unsafe.
1.7%	7199	Other (fire safety) Fuel oil leak alarm fitted with a drain cock not to manufacturers specification, ME gauge gagged, several flammable materials for in storage are near thruster, explosion proof cover of light fitting found cracked, exposed hot surfaces on generator turbo charger.



1.5%	1123	Continuous synopsis record Original CSR not board or is a copy only.
1.5%	9209	Electrical Electrical bonding wire for the radar sounding equipment on tank #3 was broken, floodlights were found not working, several electrical covers missing in the vicinity of the main engine.
1.5%	10127	Voyage of passage plan Plan inadequate, not berth to berth or found missing, no contingency planning or VTS information included within passage plan.
1.5%	11104	Rescue boats Engine not able to start, seating position not clearly indicated, painter not fitted.
1.5%	13199	Other (machinery) Water pipe leaking, oil purifier leaking, water valves leaking, steam cooler leaking
1.5%	14501	Garbage Garbage storage is full, garbage stored in food cold rooms, incorrect garbage segregation, and garbage record book entries incorrect.
1.2%	1220	Seafarer Employment Agreement SEA SEA unsigned, entries missing, terms not in accordance with MLC, wage calculation incorrect.
1.2%	3103	Railing, gangway, walkway and means for safe passage Rails broken, gangway not rigged correctly – no net/poor lighting/rail missing
1.2%	7126	Oil accumulation in engine room Excessive fuel leaks from machinery noted, excessive oily rags around the engine room, excessive oil in bilges.
1.2%	11117	Lifebuoys including provision and disposition Light not working, no light at gangway, rapid deployment prevented by obstruction.
1.2%	16105	Access control to ship Visitor cards not issued, visitor log not maintained, ID not asked for.
1.0%	6199	Other (cargo)
1.0%	7108	Ready availability of fire fighting equipment
1.0%	7115	Fire-dampers
1.0%	9232	Cleanliness of engine room
1.0%	10114	Voyage Data Recorder (VDR) / Simplified Voyage Data Recorder (S-VDR)
1.0%	10116	Nautical publications
1.0%	11102	Lifeboat inventory
1.0%	13102	Auxiliary engine
1.0%	13108	Operation of machinery
0.7%	1315	Oil record book
0.7%	2199	Other (structural condition)
0.7%	3105	Covers (hatchway - portable - tarpaulins, etc.)
0.7%	7114	Means of control (opening/closure skylights, pumps, etc.) - Machinery Spaces



0.7%	10105	Magnetic compass
0.7%	11124	Embarkation arrangements survival craft
0.7%	14104	Oil filtering equipment
0.7%	14402	Sewage treatment plant
0.7%	99101	Other safety in general
0.5%	1102	Cargo ship safety construction (including exemption)
0.5%	1305	Logbooks/compulsory entries
0.5%	1309	Fire control plan - all
0.5%	1316	Cargo information
0.5%	1320	Garbage record book
0.5%	2105	Steering gear
0.5%	2107	Ballast, fuel and other tanks
0.5%	2112	Hull - corrosion
0.5%	2117	Decks - corrosion
0.5%	3104	Cargo and other hatchways
0.5%	3107	Doors
0.5%	3108	Ventilators, air pipes, casings
0.5%	3109	Machinery space openings
0.5%	4101	Public address systems
0.5%	4114	Emergency source of power / Emergency generator
0.5%	4117	Functionality of safety systems
0.5%	5116	Operation/maintenance
0.5%	7106	Fire detection and alarm system
0.5%	7109	Fixed fire extinguishing installation
0.5%	7111	Personal equipment
0.5%	7113	Fire pumps and its pipes
0.5%	7116	Ventilation
0.5%	7120	Means of escape
0.5%	7123	Operation of Fire protection systems
0.5%	7125	Evaluation of crew performance (fire drills)
0.5%	8109	Boiler-alarm
0.5%	9109	Pipes, wires (insulation)
0.5%	9221	Entry dangerous spaces (instructions, warnings)
0.5%	10101	Pilot ladders and hoist / pilot transfer arrangements
0.5%	10136	Establishment of working language on board
0.5%	10138	Bridge Navigational Watch Alarm System (BNWAS)
0.5%	10199	Other (navigation)
0.5%	11103	Stowage and provision of Lifeboats
0.5%	11123	Emergency equipment for 2-way communication
0.5%	11199	Other (life saving)
0.5%	14105	Pumping, piping and discharge arrangements for oil tankers
0.5%	14108	15 PPM alarm arrangements
0.5%	14199	Other (MARPOL - Annex -I)
0.5%	14608	Incinerator, including operations and operating manual
0.5%	14802	Ballast Water Record Book
0.5%	14806	Crew Training & Familiarisation
0.5%	15109	Maintenance of ship and equipment
0.5%	16101	Security related defects
0.5%	18319	Food segregation



0.5%	18324	Cold Room, Cold Room Cleanliness, Cold Room Temperature
0.5%	18408	Electrical
0.5%	18418	Winches and Capstans
0.5%	18499	Other - (Health and safety protection and accident prevention)

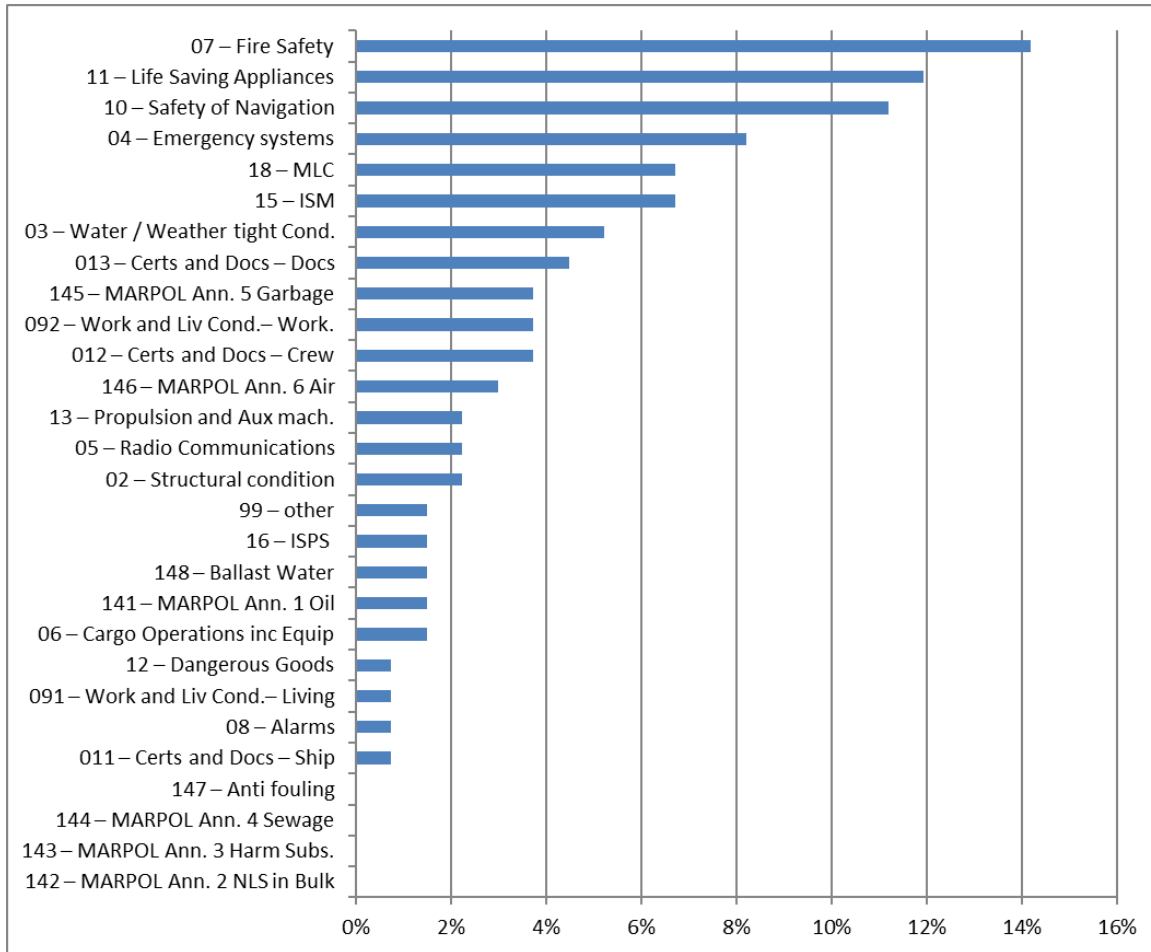


6. PSC Deficiencies by Ship Type (last 12 months) – All PSC MOU Regions

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 Q4 2020 – Q3 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



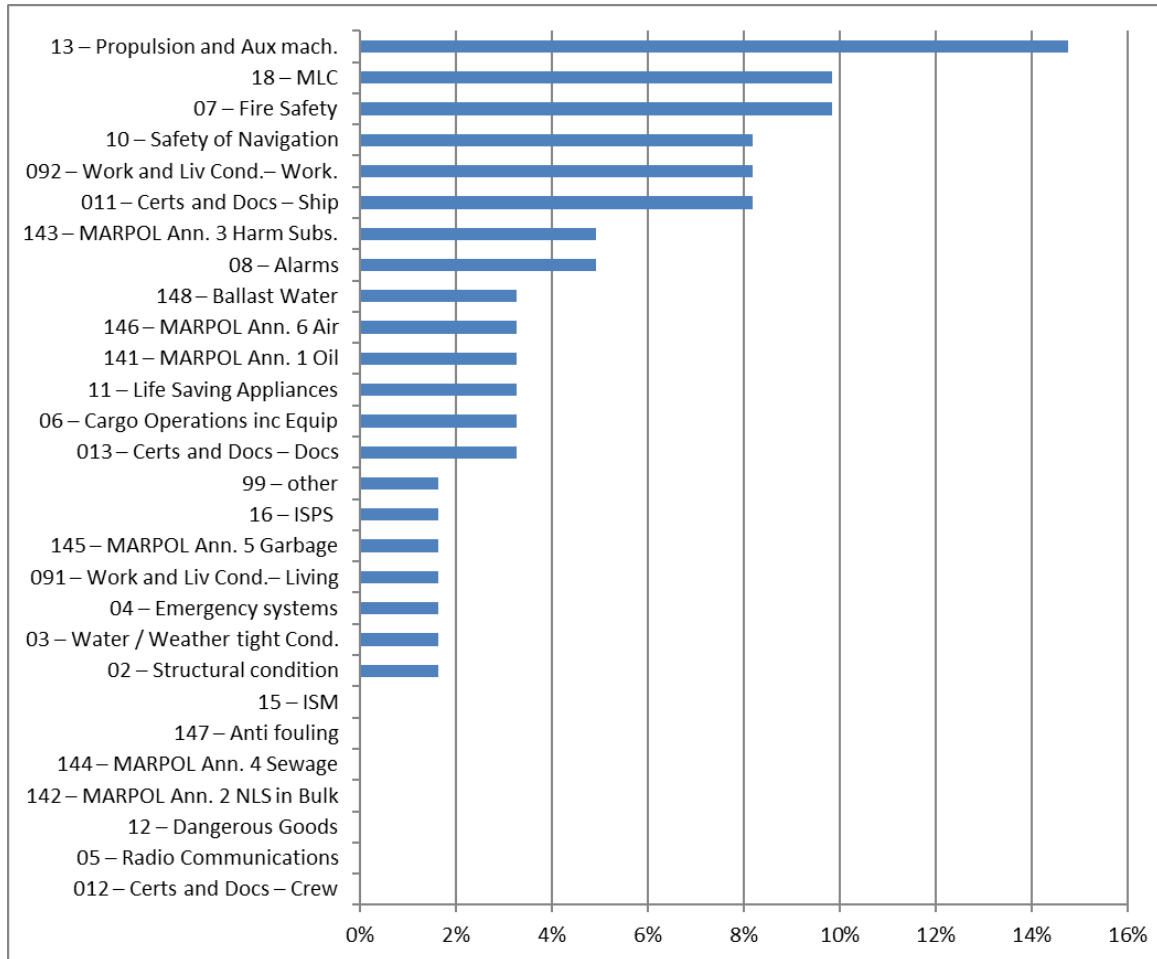
Most frequent deficiency codes

%	Code	Deficiency Description
5.2%	10109	Lights, shapes, sound signals.
5.2%	15150	ISM
3.7%	1220	Seafarer Employment Agreement SEA
3.7%	7110	Fire fighting equipment and appliances
3.7%	11131	On board training and instructions
3.7%	14501	Garbage
3.0%	7105	Fire doors/openings in fire-resisting divisions
3.0%	11101	Lifeboats
2.2%	3103	Railing, gangway, walkway and means for safe passage
2.2%	9232	Cleanliness of engine room



Gas Carriers

Overall Deficiency Trend



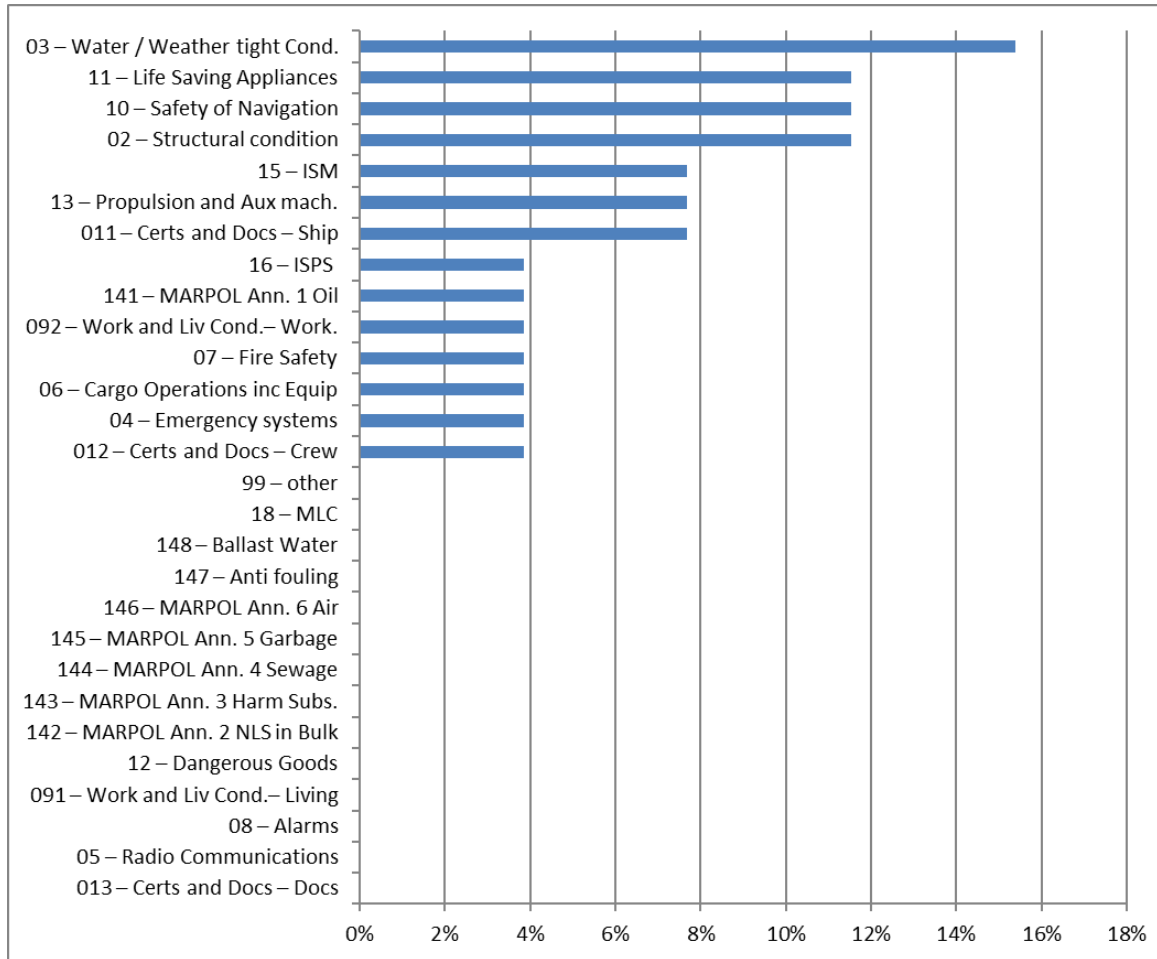
Most frequent deficiency codes

%	Code	Deficiency Description
6.6%	13101	Propulsion main engine
4.9%	13102	Auxiliary engine
3.3%	8109	Boiler-alarm
3.3%	10116	Nautical publications
3.3%	14402	Sewage treatment plant



Oil Tankers

Overall Deficiency Trend



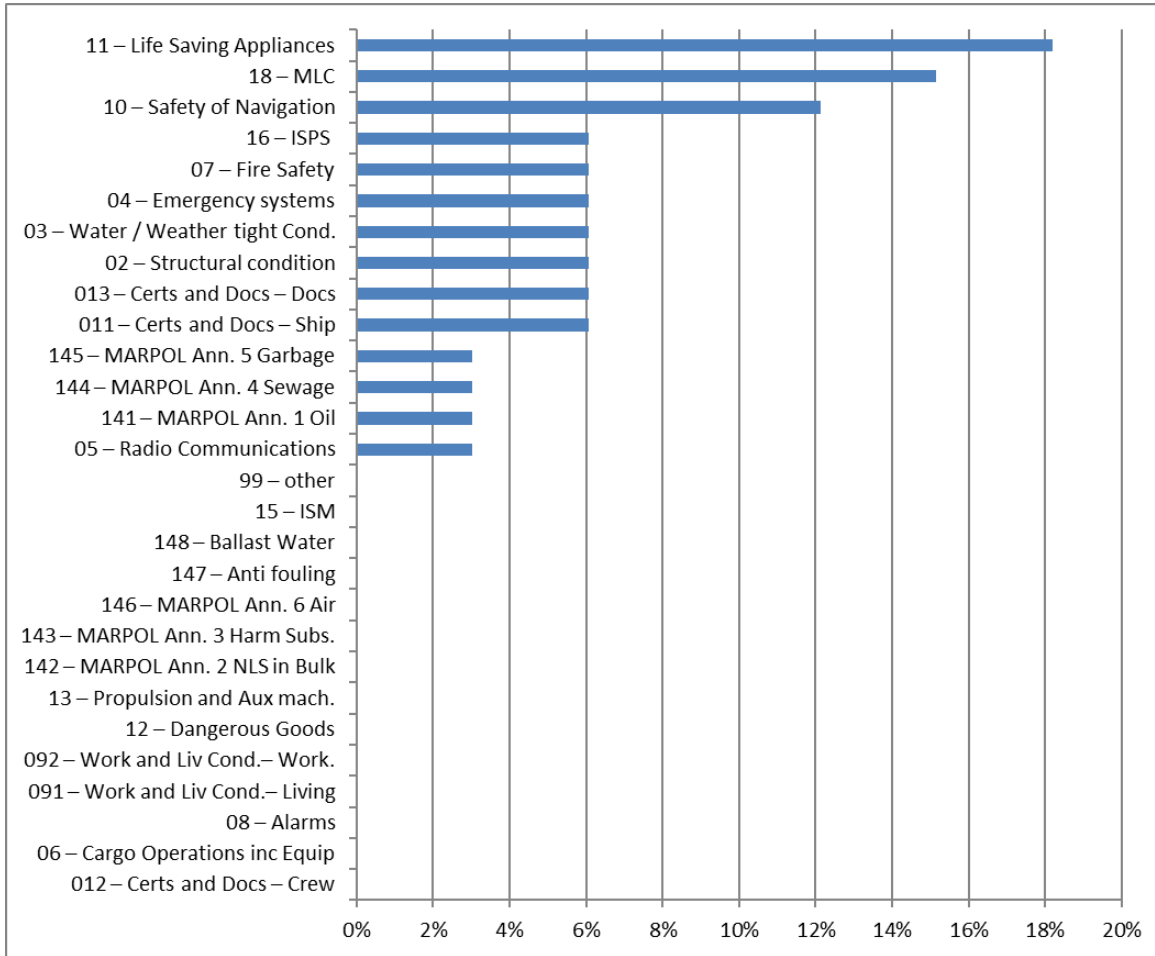
Most frequent deficiency codes

%	Code	Deficiency Description
7.7%	1123	Continuous synopsis record
7.7%	3105	Covers (hatchway - portable - tarpaulins, etc.)
7.7%	10109	Lights, shapes, sound signals.
7.7%	11101	Lifeboats
7.7%	15150	ISM



Oil/Chemical Tankers

Overall Deficiency Trend



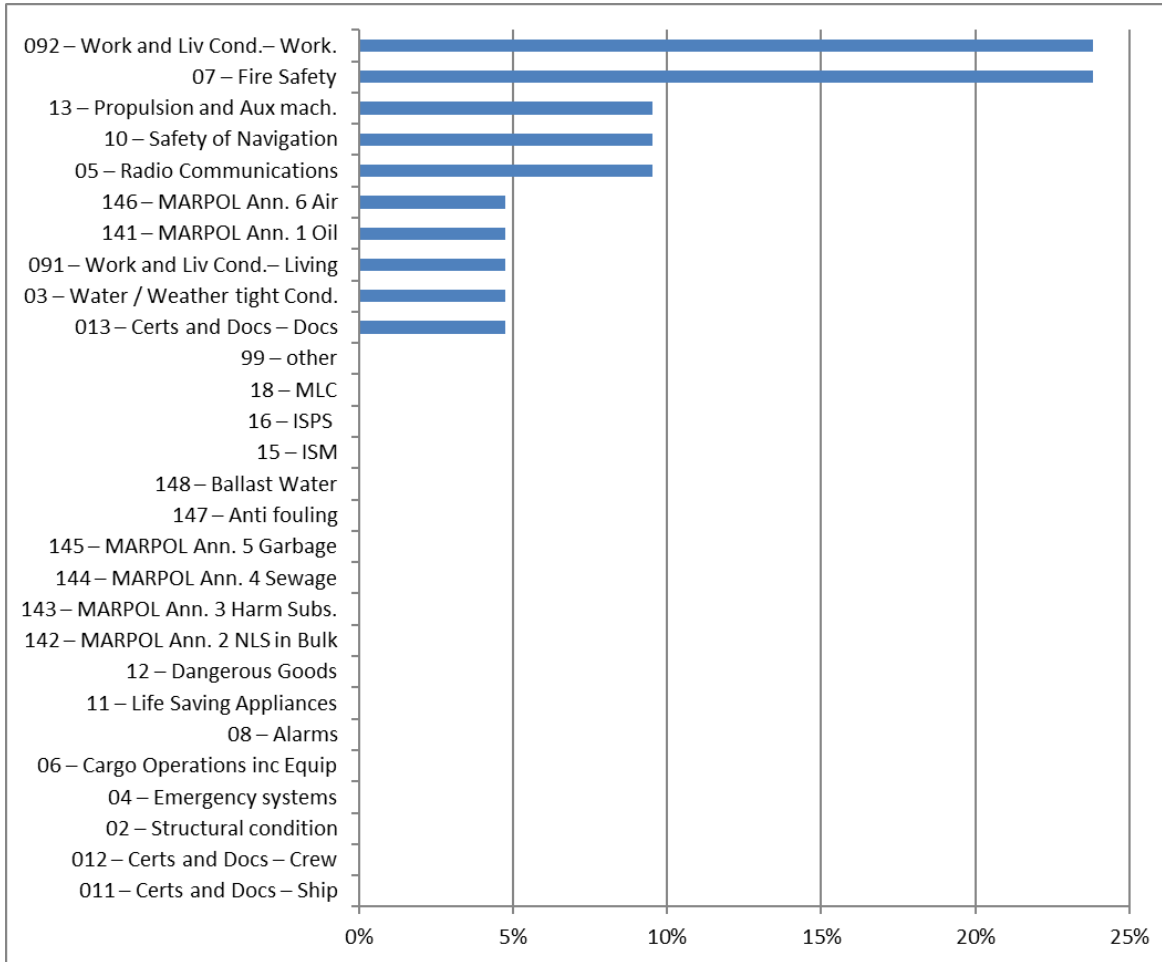
Most frequent deficiency codes

%	Code	Deficiency Description
6.1%	4103	Emergency lighting, batteries and switches
6.1%	10109	Lights, shapes, sound signals.
6.1%	11131	On board training and instructions
6.1%	16105	Access control to ship



Offshore vessels

Overall Deficiency Trend



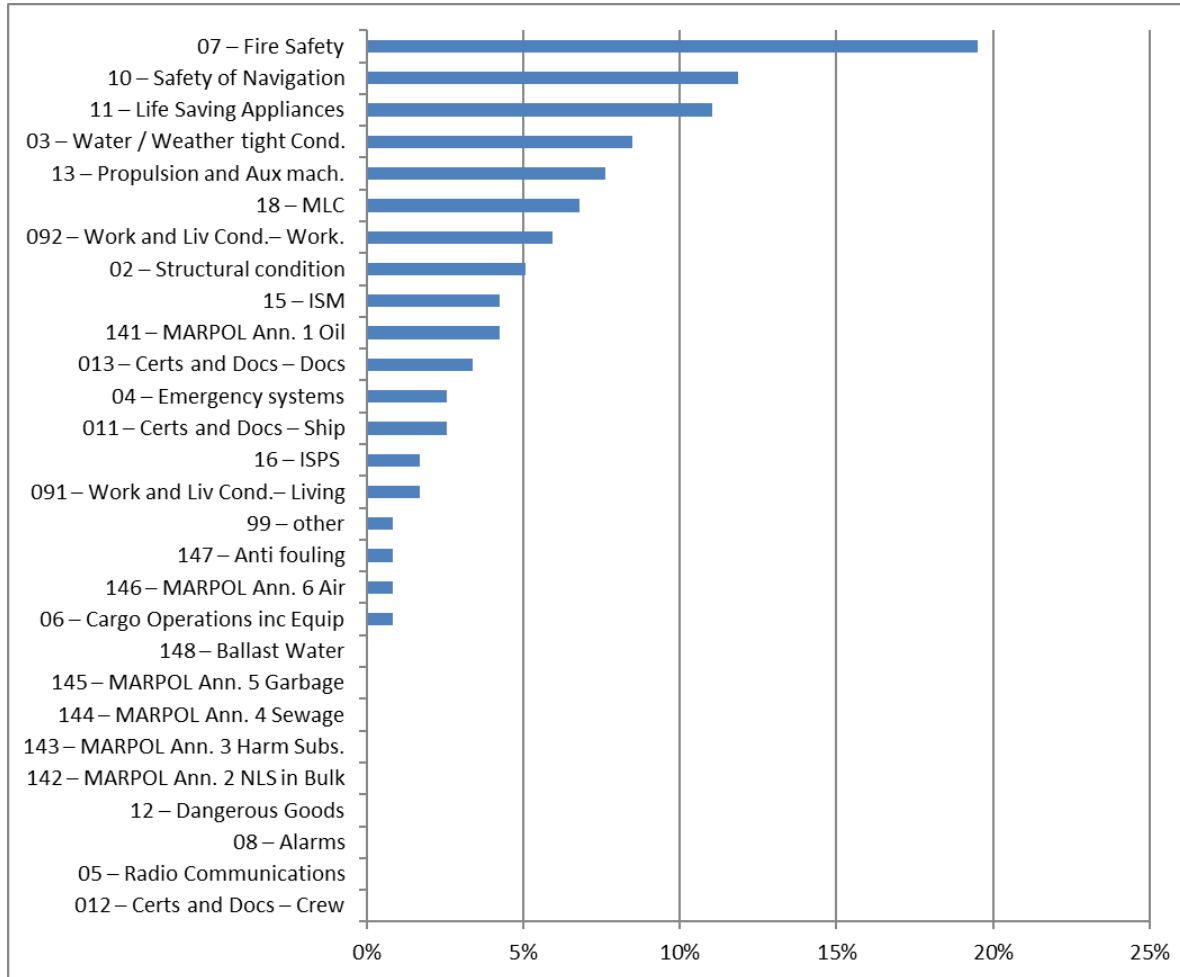
Most frequent deficiency codes

%	Code	Deficiency Description
14.3%	9209	Electrical
9.5%	7199	Other (fire safety)
9.5%	10105	Magnetic compass
9.5%	13101	Propulsion main engine
4.8%	1315	Oil record book
4.8%	3102	Freeboard marks
4.8%	5113	SART / AIS-SART
4.8%	5115	Radio log (diary)
4.8%	7106	Fire detection and alarm system
4.8%	7115	Fire-dampers
4.8%	7120	Means of escape
4.8%	9198	Other (crew and accommodation)
4.8%	9207	Obstruction/slipping, etc.
4.8%	9217	Warning notices
4.8%	14104	Oil filtering equipment
4.8%	14608	Incinerator, including operations and operating manual



Other Cargo ships

Overall Deficiency Trend



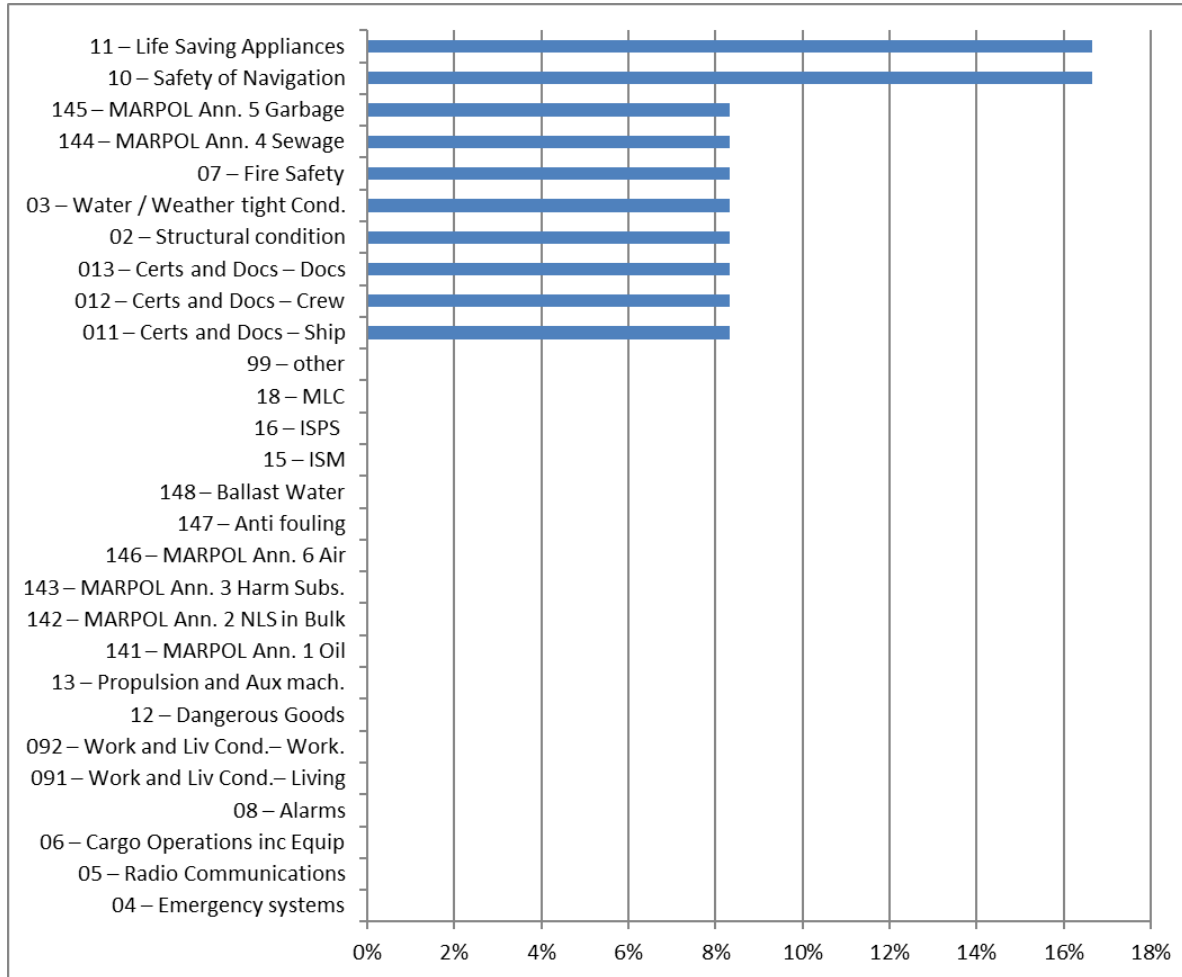
Most frequent deficiency codes

%	Code	Deficiency Description
4.2%	3102	Freeboard marks
3.4%	7126	Oil accumulation in engine room
3.4%	7199	Other (fire safety)
3.4%	10127	Voyage of passage plan
3.4%	13199	Other (machinery)
2.5%	7105	Fire doors/openings in fire-resisting divisions
2.5%	11102	Lifeboat inventory
2.5%	11104	Rescue boats
2.5%	15150	ISM
1.7%	1309	Fire control plan - all
1.7%	2105	Steering gear
1.7%	4103	Emergency lighting, batteries and switches
1.7%	7115	Fire-dampers
1.7%	7123	Operation of Fire protection systems
1.7%	9209	Electrical
1.7%	10109	Lights, shapes, sound signals.
1.7%	10114	(VDR) / (S-VDR)
1.7%	11124	Embarkation arrangements survival craft
1.7%	13101	Propulsion main engine
1.7%	14104	Oil filtering equipment
1.7%	14105	Pumping, piping and discharge arrangements for oil tankers



Yachts

Overall Deficiency Trend

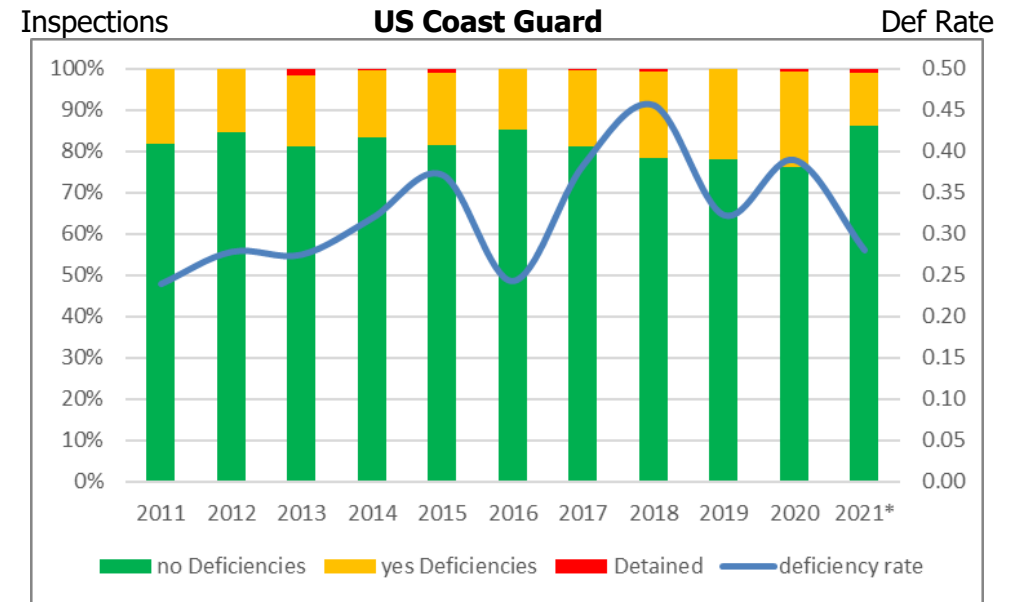
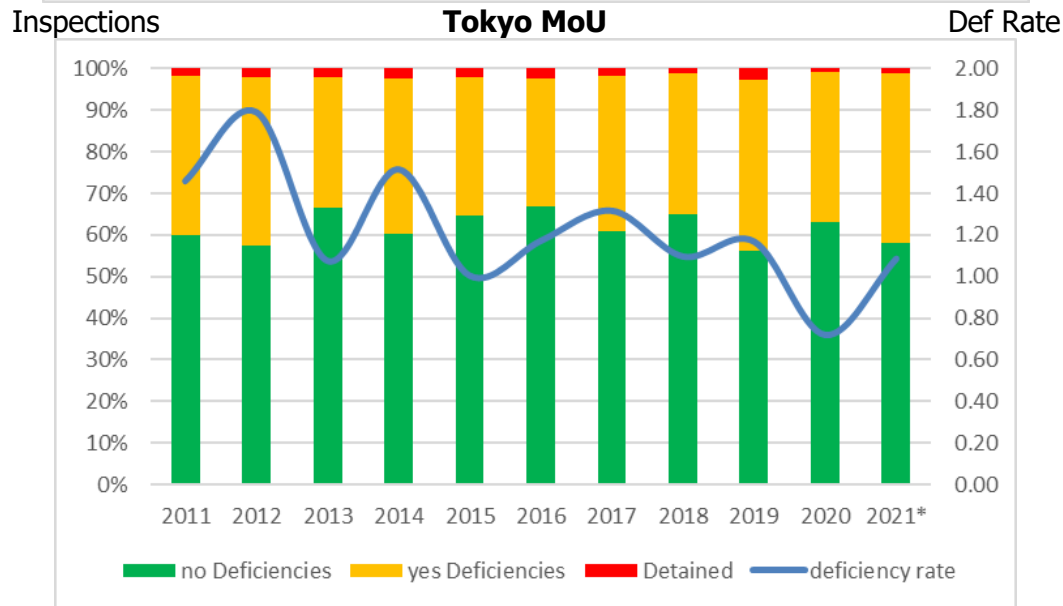
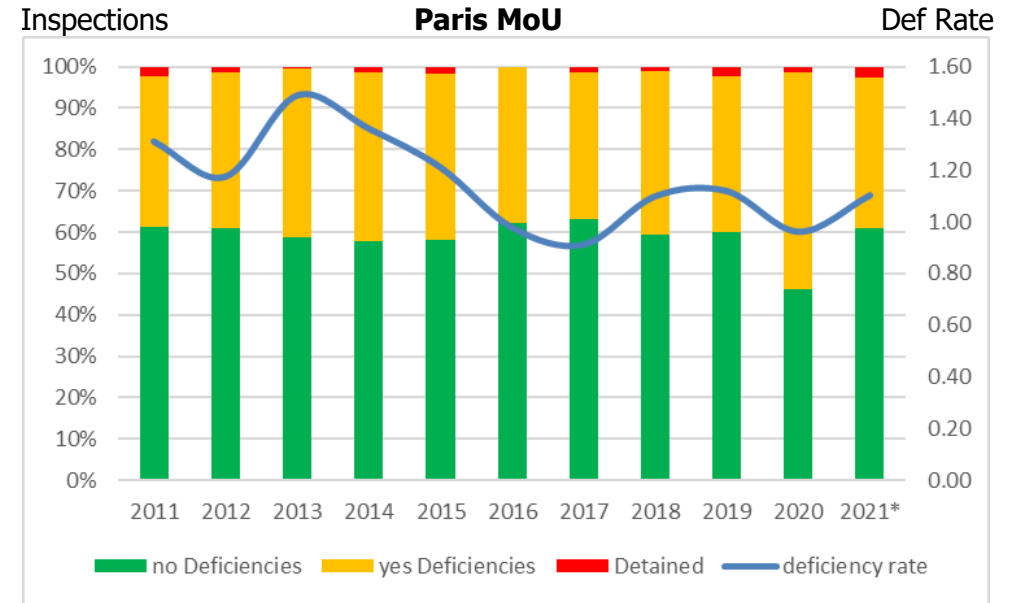
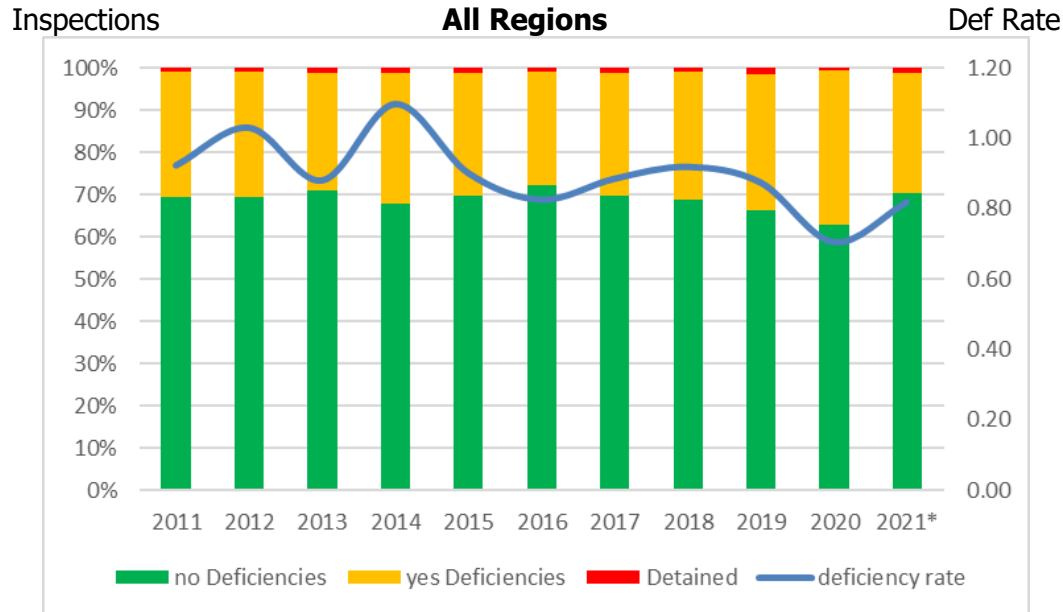


Most frequent deficiency codes

%	Code	Deficiency Description
8%	1113	Minimum safe manning document
8%	1209	Manning specified by the minimum safe manning document
8%	1320	Garbage record book
8%	2199	Other (structural condition)
8%	3102	Freeboard marks
8%	7125	Evaluation of crew performance (fire drills)
8%	10112	Electronic charts (ECDIS)
8%	10138	Bridge Navigational Watch Alarm System
8%	11117	Lifebuys including provision and disposition
8%	11123	Emergency equipment for 2-way comm.
8%	14499	Other (MARPOL ANNEX IV)
8%	14502	Placards



7. Overall PSC Regional Inspections and Deficiency Rate per Year



Deficiency Rate = (total number of deficiencies) / (total inspections)

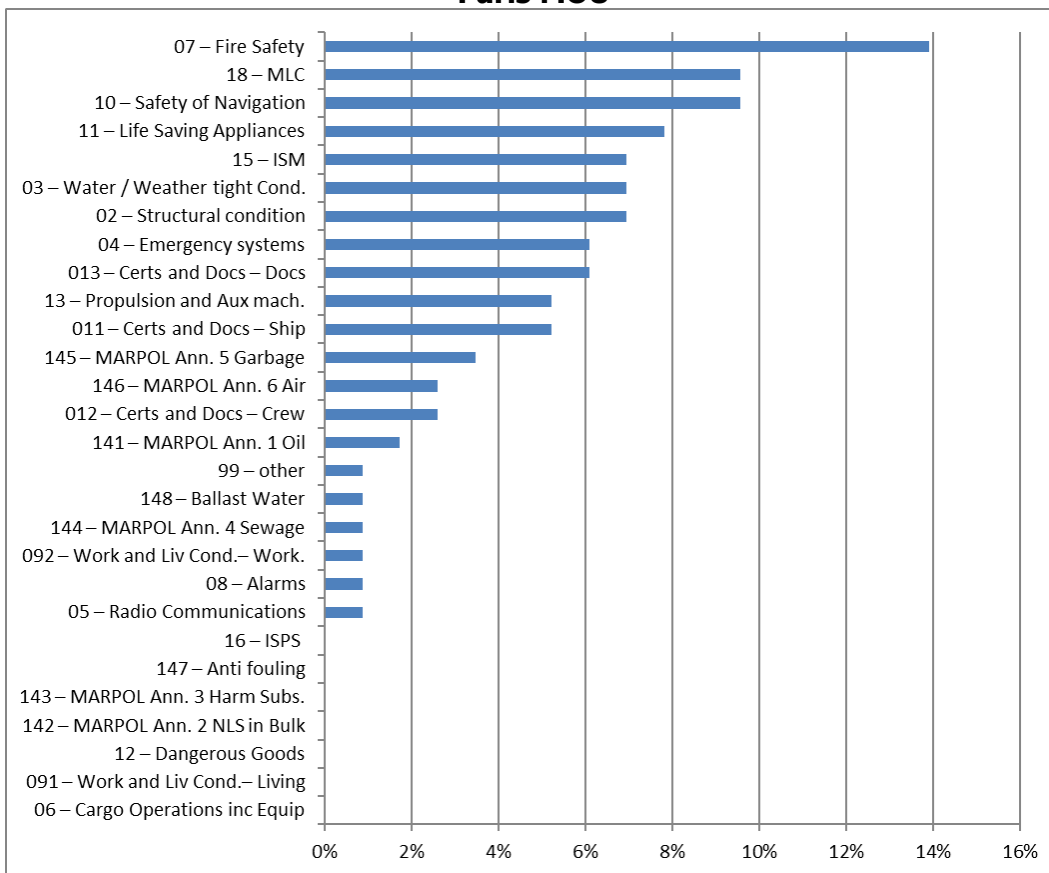
*cumulative in the year so far



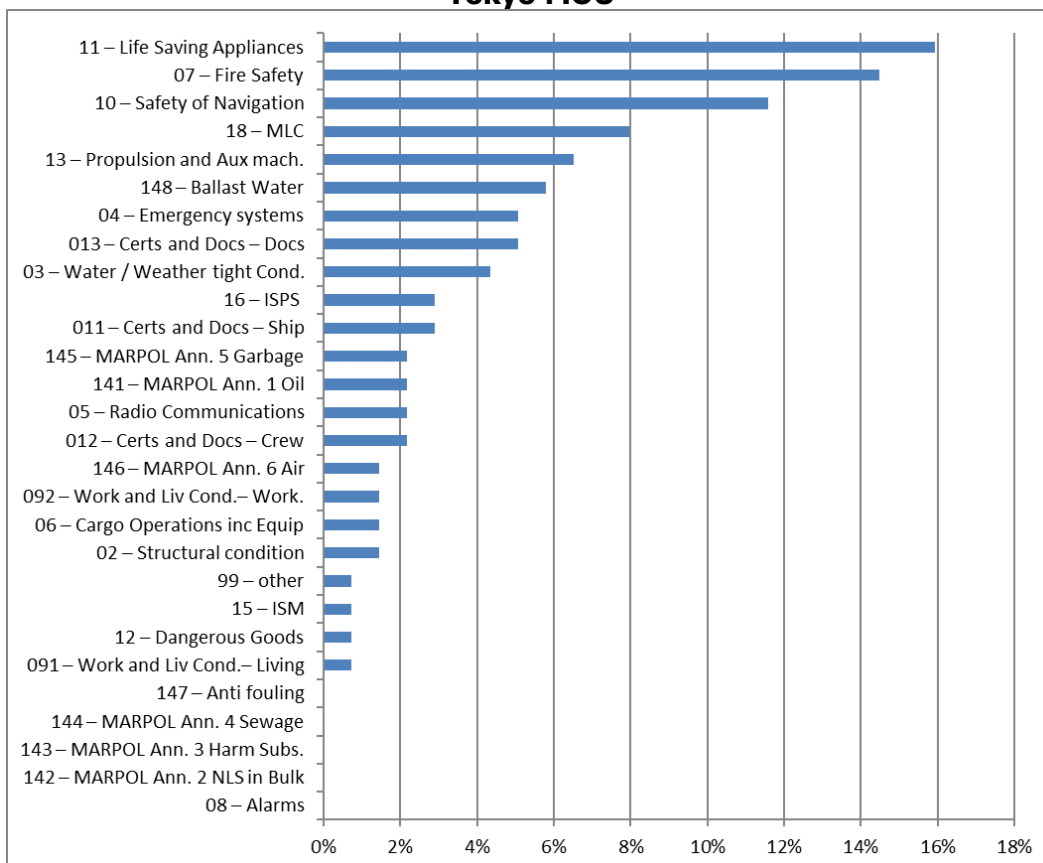
8. PSC Regional Deficiencies (last 12 months)

The following charts represent deficiencies raised in an MOU Region expressed as a percentage of the total deficiencies in the last 12-month period Q4 2020 – Q3 2021 (inclusive):

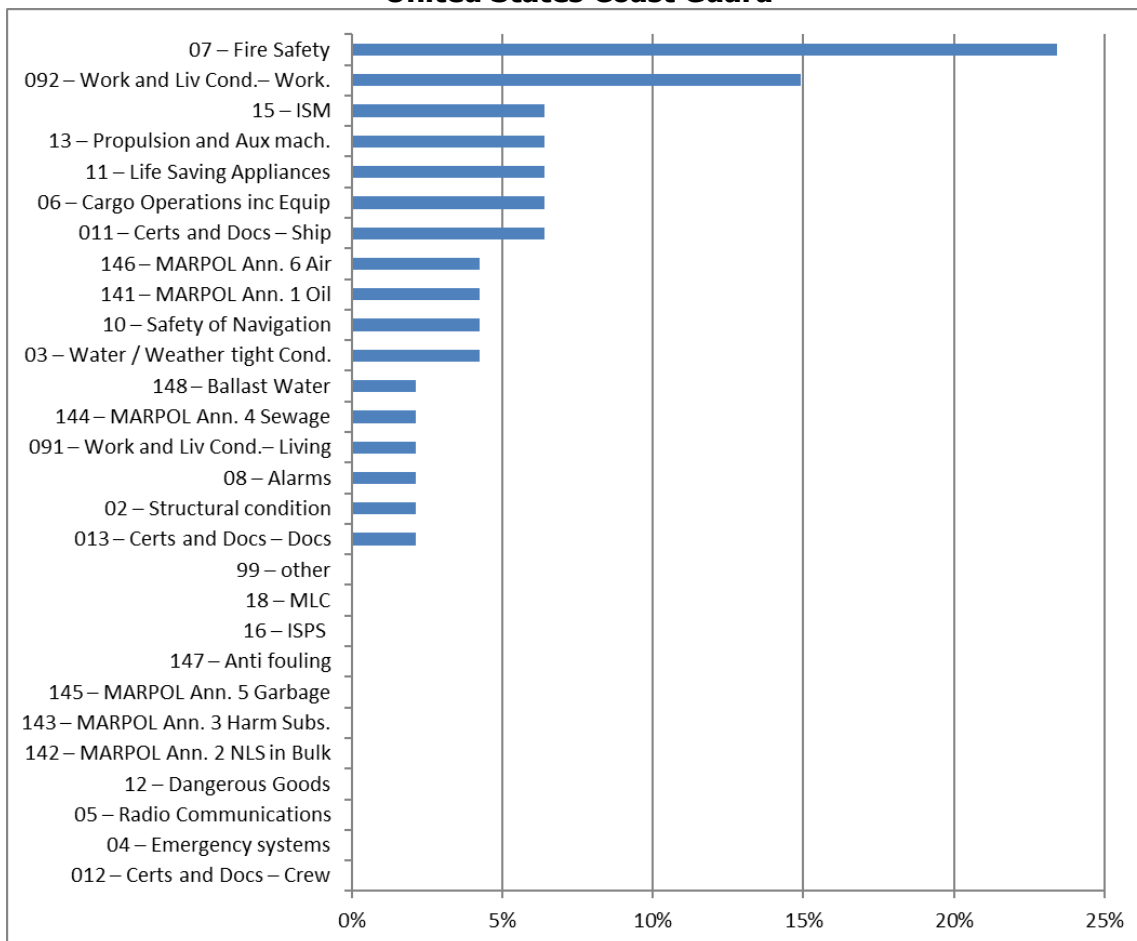
Paris MOU



Tokyo MOU



United States Coast Guard



Latin America MOU

