

**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 and the elimination of "sub-standard" ships. The Port State authority will require defects to be put right and, where appropriate, detain ships for this purpose. PSC is therefore a port state's defence against arriving and departing substandard ships.

Technical managers are encouraged to forward this notice to Masters of Isle of Man registered ships in their fleet in support of shipboard operations and awareness prior to any PSC inspection.

**Isle of Man Ship Registry — happy to help.** For questions concerning statutory requirements relating to Isle of Man registered ships please email Isle of Man Ship Registry [marine.survey@gov.im](mailto:marine.survey@gov.im). 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).



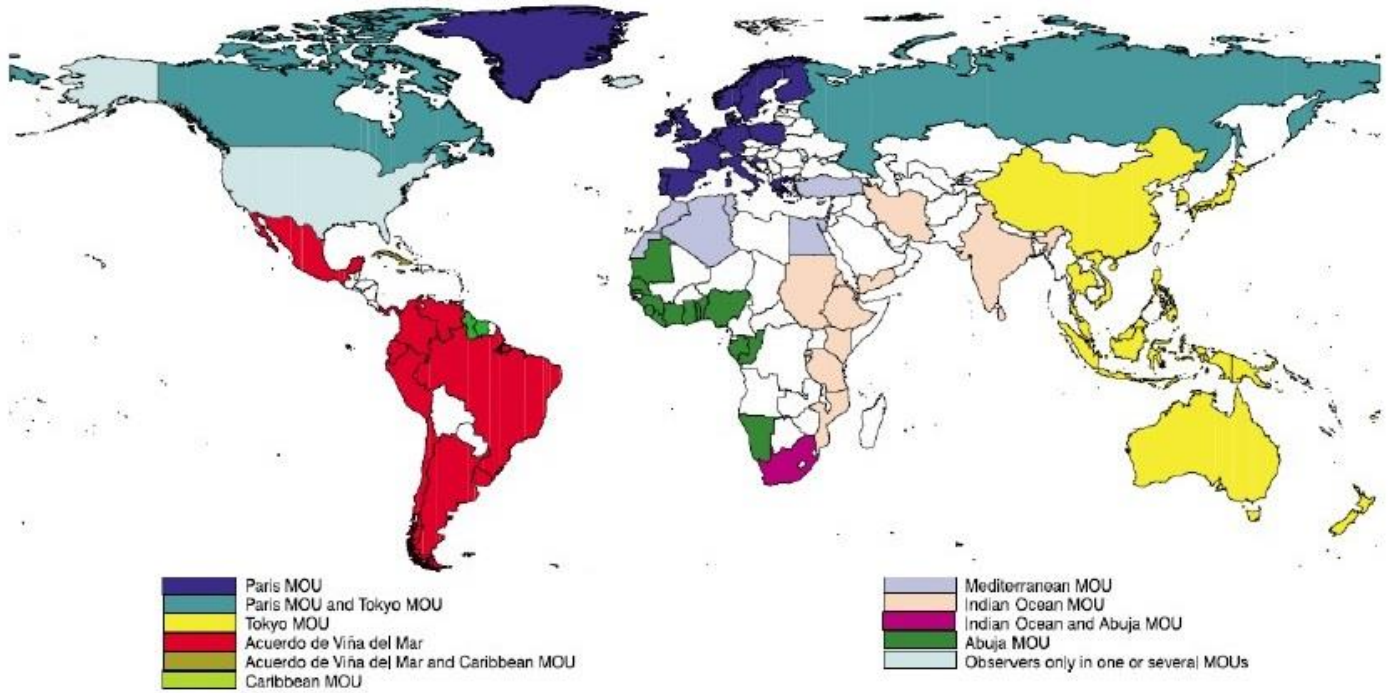
### **Guidance for Masters should you receive a deficiency during a PSC inspection.**

- If you agree with the deficiency raised then agree a practical corrective action plan with the PSC Officer. This should be reflected in the "action taken" coding stated on the Form B.
- If you do not agree with the deficiency raised then politely discuss with the PSC officer before he/she leaves the vessel to clarify the statutory requirement (applicable to the ship's age and tonnage) and its implementation on board: 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.

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**Port State Control Regions**



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

Black Sea MOU	<a href="http://www.bsmou.org">www.bsmou.org</a>	Riyadh MOU	<a href="http://www.riyadhmou.org">www.riyadhmou.org</a>
Paris MOU	<a href="http://www.parismou.org">www.parismou.org</a>	United States Coast Guard	<a href="http://cgmix.uscg.mil/PSIX">cgmix.uscg.mil/PSIX</a>
Indian MOU	<a href="http://www.iomou.org">www.iomou.org</a>	Latin America MOU	<a href="http://www.acuerdolatino.int.ar">www.acuerdolatino.int.ar</a>
Mediterranean MOU	<a href="http://www.medmou.org">www.medmou.org</a>	Caribbean MOU	<a href="http://www.caribbeanmou.org">www.caribbeanmou.org</a>
Tokyo MOU	<a href="http://www.tokyo-mou.org">www.tokyo-mou.org</a>	West and Central Africa MOU	<a href="http://www.abujamou.org">www.abujamou.org</a>

**Remember...**

- All statutory equipment on board must be maintained in full working order capable of being used and ready for immediate use, which may be required to be 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.

**For information concerning** "What to expect during a PSC Inspection" watch the IOM Ship Registry video presentations on the [Isle of Man Ship Registry YouTube channel](#).



## 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	CLC/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	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■

■ 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 - [https://www.ics-shipping.org/wp-content/uploads/2022/01/Shipping-Industry-Flag-State-Performance-Table-2021-2022\\_Final.pdf](https://www.ics-shipping.org/wp-content/uploads/2022/01/Shipping-Industry-Flag-State-Performance-Table-2021-2022_Final.pdf)

## 2. MOU Regional Information:-

### **Paris MoU (01/04/2022) – latest news:**

- 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](#)
- **PS Circular: 101** - Guidance on repatriation of seafarers due to situation in Ukraine, which aims to provide some guidance:- <https://parismou.org/guidance-repatriation-seafarers-due-situation-ukraine>.
- **Containers on Bulk Carriers** is providing some background information on the latest development where bulk carriers are starting to carry containers:- <https://www.gard.no/web/updates/content/32435674/carriage-of-containers-on-bulk-carriers->
- **AFS Convention**:- will come into force on 1 January 2023. The resolution contains a ban to apply or re-apply anti-fouling systems containing cybutryne from 1 January 2023. All ships should remove or seal such anti-fouling systems no later than 60 months following the last application of such anti-fouling system prior to 1
- **Towing and mooring** (January 2023. SOLAS Ch II-1/3.8:-) require appropriate and safe-to-use designs of mooring arrangements, and introduce a maintenance and inspection regime, as well as proper documentation.

### **Tokyo MoU (01/04/2022):**

- 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.
- [Tokyo MoU COVID19 Guidance](#)

[Guidance on Remote PSC Inspections](#)



**United States Coast Guard (USCG) 01/04/2022:**

- The Isle of Man Ship Registry has achieved the required Flag State standard (2021) 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 2021 USCG Annual Report (to be published soon).
- 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 (first 3 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 deficiency areas that resulted in detention on Isle of Man registered ships in the first 3 months period Q1 2022 (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.
- 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.
- STCW Certificates found unsigned.

#### **03 – Water/Weathertight condition**

- Several ballast tank and air vent closing arrangements defective.
- Structural defects found in need of repairs – no Class advised

#### **07 – Fire Safety**

- Oil accumulation of oil and rags on several parts of engine room. Special attention to generators, bilges, heavy fuel oil tank, diesel oil settling tank.
- Fire drill could be conducted because of lack of crew or lack of familiarization on board.
- Sample extraction smoke detection system for cargo hold line not clear and debris found within the lines making the system not ready for immediate use/out of order
- Fire alarm panel malfunction

#### **10 – Navigation**

- BNWAS found inoperative.
- Compass no records of errors and bubbles found; service records missing.
- Radar spares delayed for full repairs resulting in radar defective

#### **11 – Life Saving Appliances**

- Freefall lifeboat engine unable to start by battery.
- Lifebuoys not marked/light not working/expired MOB
- Embarkation ladder rope lines deteriorated

#### **15 – ISM**

- The ISM system is not adequately implemented on board.
- Poor record keeping and lack of awareness by administration on board in not being able to find records and entries missing.
- The ISM system for effective maintenance and defect reporting is not effectively implemented on board resulting in statutory equipment failures.

#### **14–BWM**

- In correct entries found and if D1 or D2 system is used
- BWM TS inoperative



## **02 – Electrical**

- Equipment for electrical checks found inoperative

## **13 – Engine**

- Gauges and dials found defective
- Lube oil leakage and sounding pipe governor disconnected

## **183 – Accommodation, recreational facilities, food and catering**

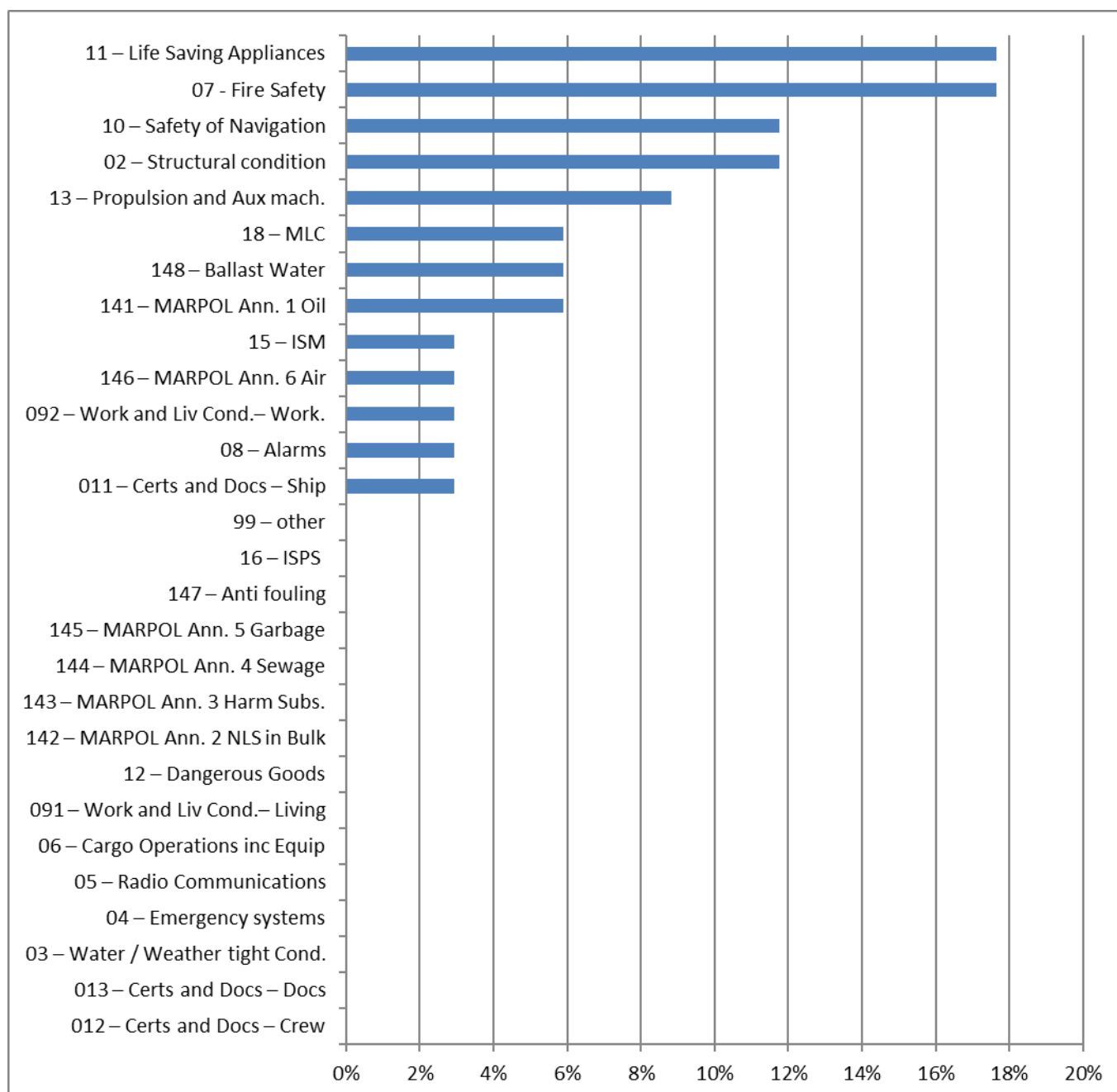
- Lack of store; galley cleanliness.
- Cold room temperatures failure

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 (first 3 months of 2022) – All PSC MOU Regions

The following chart represents deficiency areas requiring corrective action raised in all MOU Regions expressed as a percentage of the total deficiencies in the last 3-month period Q1 2022 (inclusive):



For example "07-Fire Safety" is made up of the total 7xxx deficiency codes raised.

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 15 months) – All PSC MOU Regions

The following table represents the most common individual deficiency items raised by code (Paris MOU coding system) with examples of deficiencies raised in the last 15-month period Q1 2021 – Q4 2021 – Q1 2022 (inclusive) in all 10 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
17.6%	11	<b>Life Saving Appliances</b> On board training and missing instructions Lifebuoys to comply with convention standards Rigid Liferrafts, embarkation ladder to be replaced Marine evacuation systems, LSA to be ready for use
17.6%	07	<b>Fire Safety</b> Unsafe fire doors and openings in fire divisions Personal equipment not readily available Fire control plan not readable Ventilation fire flaps to be to be freed-up Sounding pipes of FO tanks kept permanently open
11.8%	10	<b>Safety of Navigation</b> Nautical publications expired Compass correction log not filled correctly Defective navigation lights Inoperative radar
11.8%	02	<b>Structural condition</b> Bulkhead corrosion, means of access in poor conditions No records of Guidelines for Maintenance and Monitoring of On-Board Materials Containing Asbestos found on board
8.8%	13	<b>Propulsion and Aux mach.</b> Fire and general service pumps to be repaired ME LO Gauge and cooling gauge inoperative
5.9%	141	<b>MARPOL Ann. 1 Oil</b> OWS to be demonstrated by ER staff Bilge oil water mixtures to be removed
5.9%	148	<b>Ballast Water</b> BWM records not clearly written nor indicative of D1 or D2 system

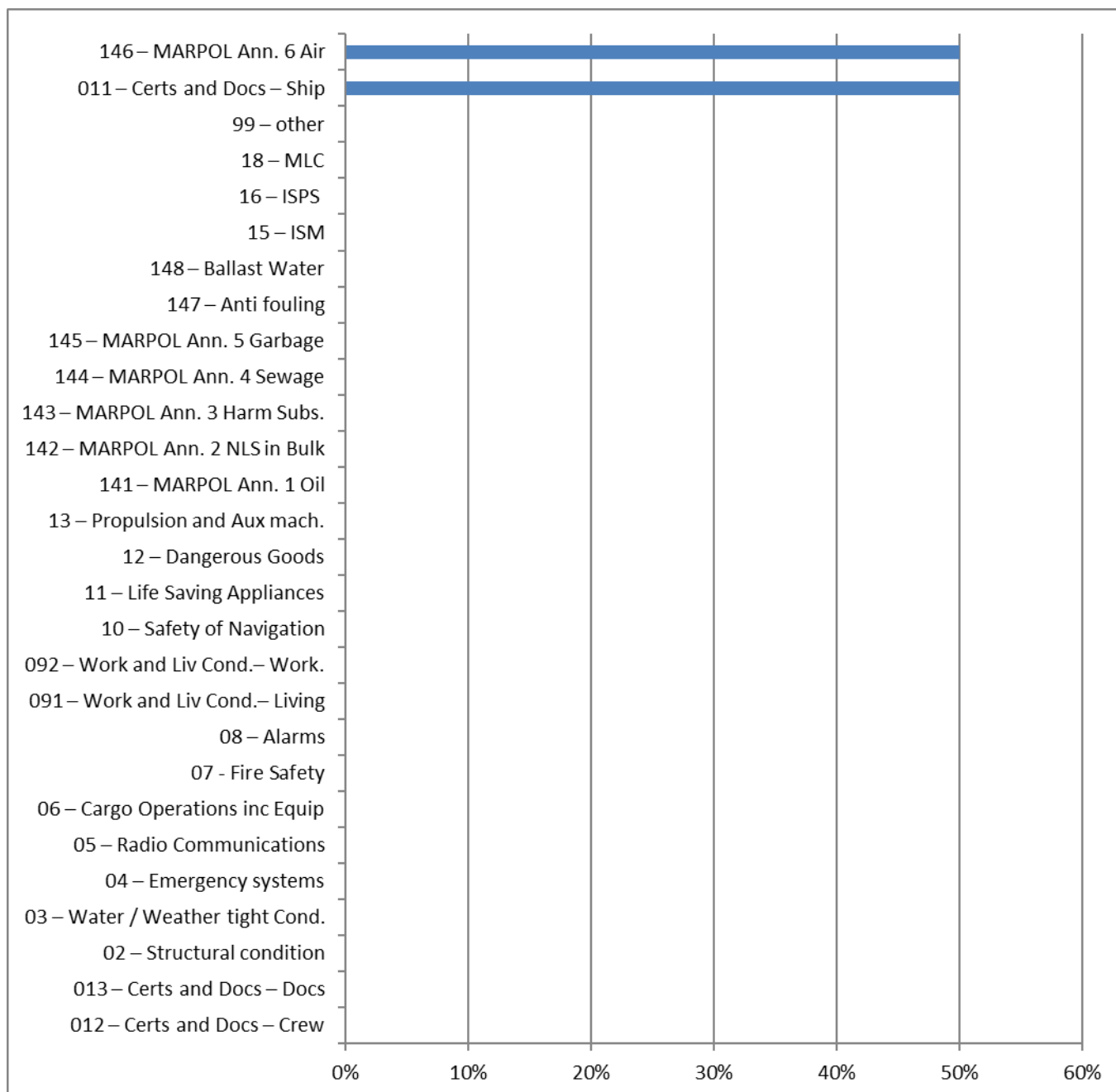




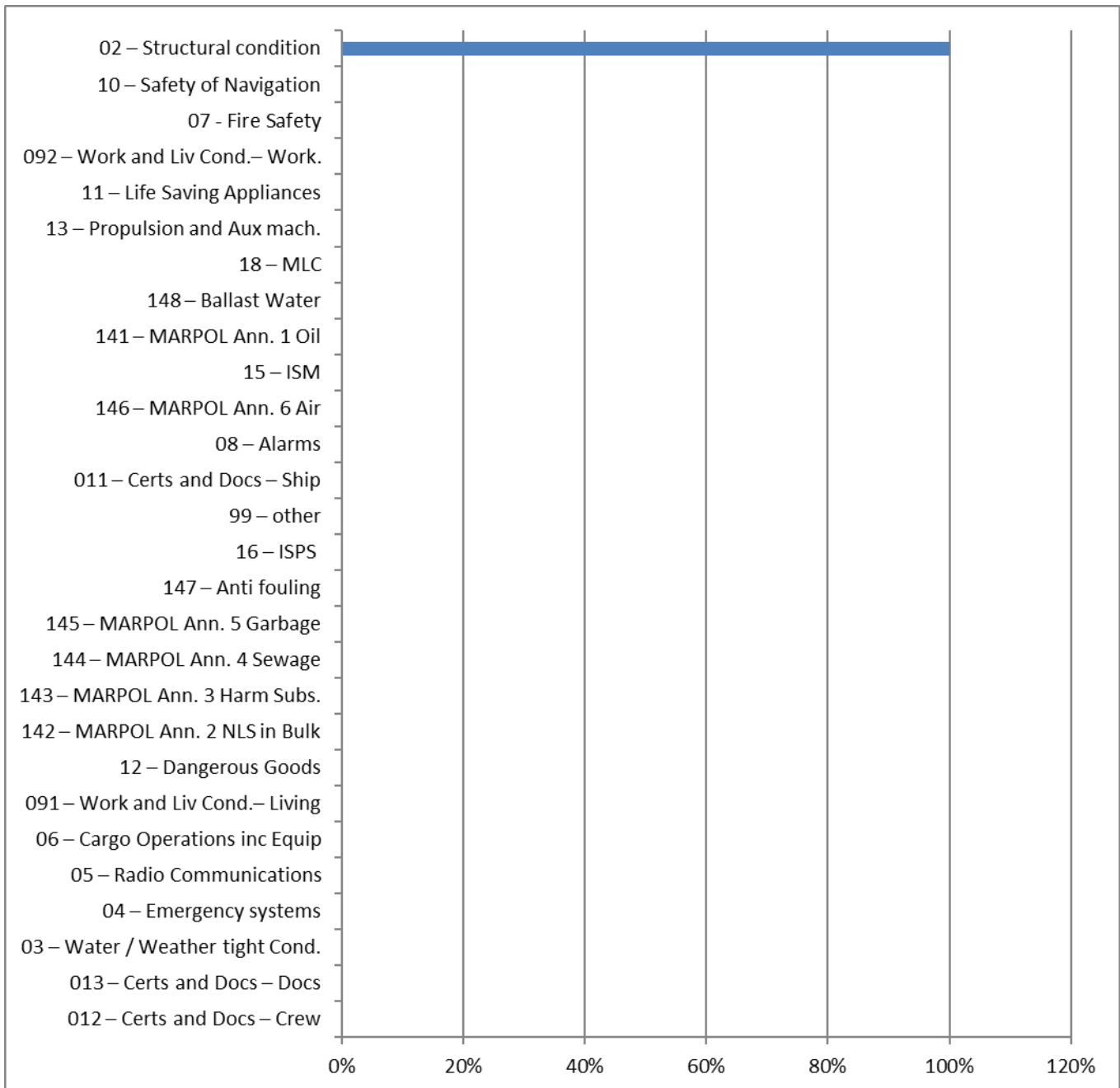
## 6. PSC Deficiencies by Ship Type (last 15 months) – All PSC MOU Regions

The following tables and charts represent the most common deficiency items raised by code (Paris MOU coding system) per ship type in the last 15-month period Q1 2021 – Q1 2022 (inclusive) in all MOU regions – Bulk carriers, Gas carriers, Oil tankers, Oil/Chemical tankers, Offshore vessels, Cargo ships, Yachts.

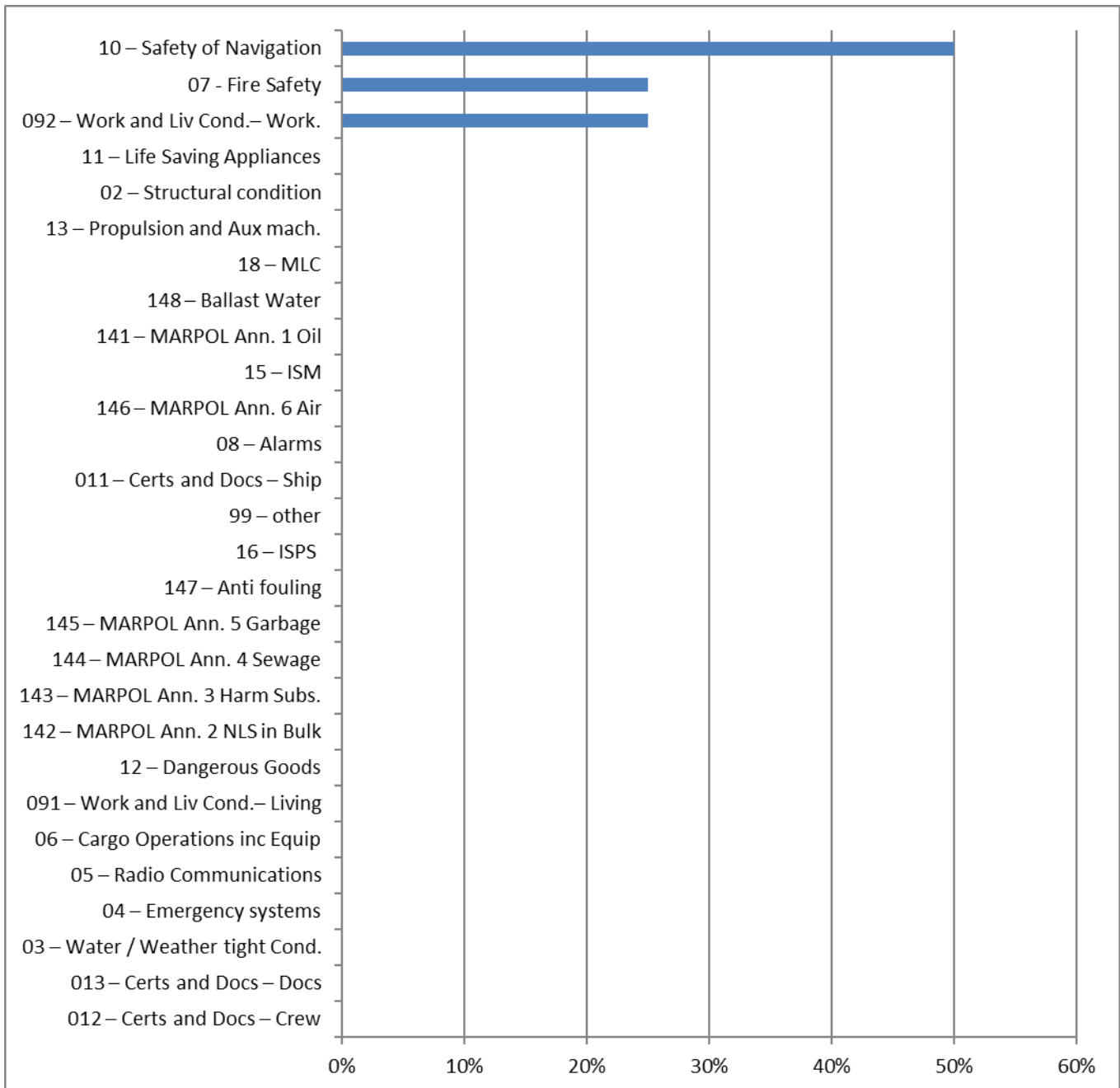
### Bulk Carriers Overall Deficiency Trend



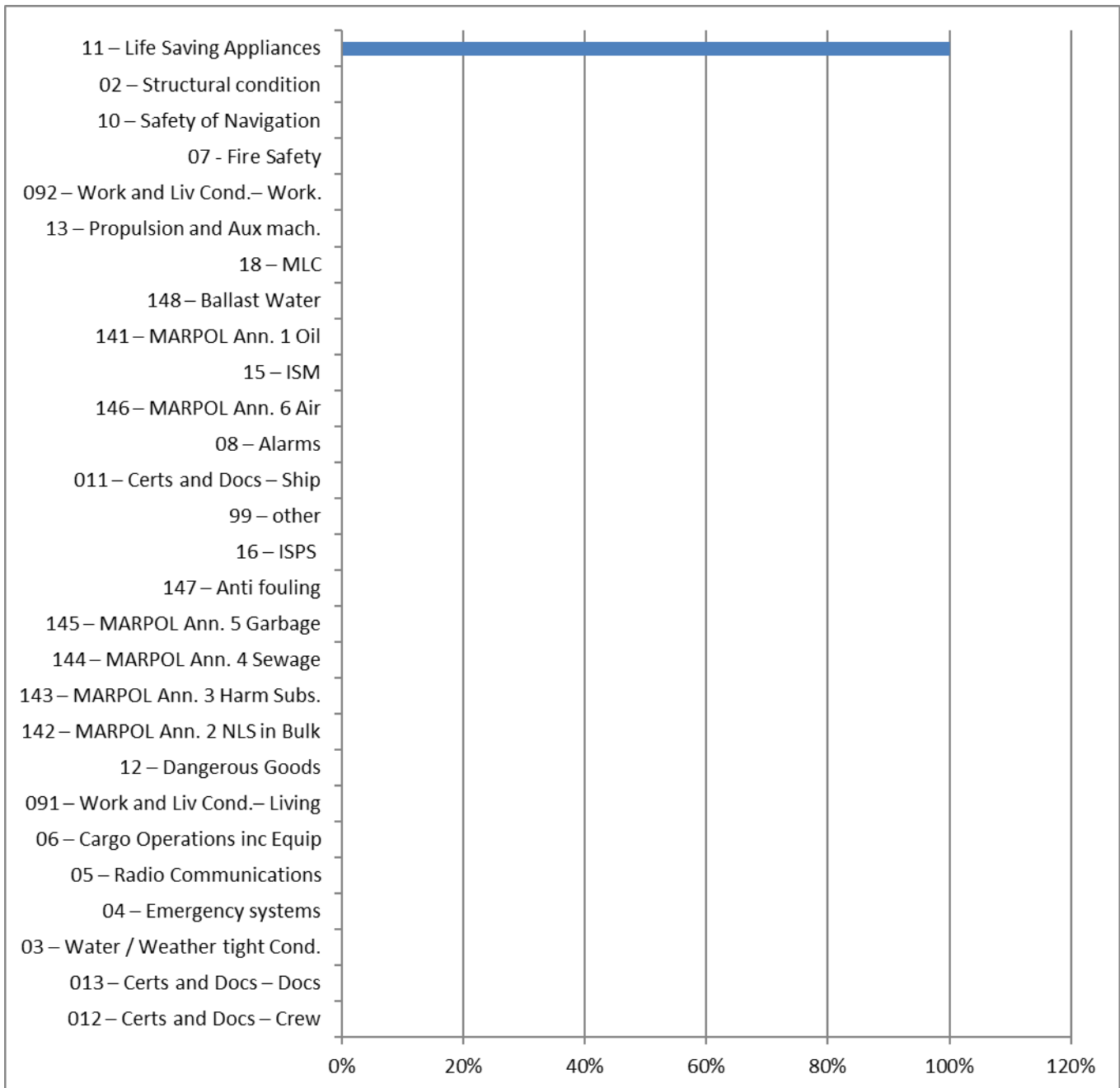
## Gas Carriers Overall Deficiency Trend



## Oil/Chemical Tankers Overall Deficiency Trend



## Offshore vessels Overall Deficiency Trend



## Other Cargo ships Overall Deficiency Trend

