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## CIRCULAR Alert on detainable deficiencies

Following a recent Port State Control (PSC) inspection, a number of deficiencies have been imposed that resulted in the detention of the vessel. Dromon wishes to draw attention to these detainable deficiencies to avoid re-occurrence.

[Notice to: Ship Owners/ Managers/ Operators | Surveyors/ Auditors](#)

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### CONTINUOUS SYNOPSIS RECORD

During the PSC Inspection it was noted that [the continuous synopsis record and application document for change were not onboard](#).

The primary purpose of the CSR is to provide a history of the ship which can be inspected by appropriate officials. SOLAS, Chapter XI-1, Regulation 5 requires all passenger ships and cargo ships of 500 gross tonnage and above engaged on international voyages to have on board a CSR. In accordance with IMO Resolution A.959(23), as amended, a CSR file comprises:

1. all CSR documents (Form 1) issued over the life of the ship;
2. all amendment forms (Form 2) attached to each individual CSR document; and
3. all indices of amendments (Form 3) relating to each CSR document.

Each original CSR document **is to be sent to the ship and kept by the ship throughout its lifetime**. It is the responsibility of the Company to ensure that the CSR file is complete, accurate, and maintained (as original) on board. In case of loss or damage to a ship's CSR file, the Company should contact the ship's Administration without delay, and list the papers lost or damaged.

It is imperative that vessels adhere to their statutory certificate requirements while engaged on any voyage. Valid certificates not only assure PSC authorities that the standards pertaining to ship stability, structure, safety and security are adhered to, they also prevent undue delays, detentions, and fines.

## MUSTER LIST

Through the PSC Inspection it was noted that *the muster list was not posted*.

According to SOLAS, Chapter III, Regulation 8, clear instructions to be followed in the event of an emergency shall be provided for every person on board.

Muster lists and emergency instructions complying with the requirements of SOLAS, Chapter III, Regulation 37, shall be exhibited in conspicuous places throughout the ship including the navigation bridge, engine-room and crew accommodation spaces.

## GARBAGE MANAGEMENT PLAN

Another deficiency imposed was that *the garbage management plan was not adapted to the new ISM/SMS and it was not provided in the ship's working language as required*.

ShipOwners should note that upon change of the vessel's ISM/SMS a new GMP should be issued and exist on board their vessel.

A GMP is mandatory for all ships above 100GT and on ships certified to carry 15 persons or more and it is written in the working language of the crew as per the guidelines developed by the IMO. The GMP to be retained onboard as a record for a period of two years from the date of last entry and a Responsible officer is to be in charge for maintaining garbage management plan on ship.

## LONG RANGE IDENTIFICATION AND TRACKING SYSTEM (LRIT)

During the PSC Inspection, it was noted that *the LRIT conformance test was not reflecting the actual vessel's operating conditions*.

The Long Range Identification and Tracking (LRIT) system is a designated IMO system designed to collect and disseminate vessel position information received from IMO member States ships that are subject to the International Convention for the Safety of Life at Sea (SOLAS).

A conformance test is required for all shipborne LRIT equipment in order to ensure that the equipment, as fitted on board, complies with the provisions of SOLAS V/19-1.6.

Upon satisfactory completion of a shipborne conformance test, the LRIT conformance test report should be issued by the flag Administration or the Service Supplier who conducted the test acting on behalf of the Administration. The original LRIT report shall be placed on board with copies provided to the ship's DPA.

The Conformance test report should be considered as no longer remaining valid if:

- a. there is a change in the shipborne equipment used to transmit LRIT information;
- b. the ship is transferred to the flag;
- c. the Service Supplier which has issued the Conformance test report has notified the Administration or the vessel's RO which, has issued the certificate is no longer in a position to attest the validity of the report; and
- d. the flag Administration has withdrawn the recognition or authorization of the Service Supplier which conducted the conformance test.<sup>1</sup>

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<sup>1</sup> However, in such cases the flag Administration concerned may decide that the Conformance test report, issued either prior to the date of withdrawal of such recognition or authorization or prior to a date determined by the flag Administration, remain valid subject to these being considered as being the responsibility of flag Administration.

## NAUTICAL PUBLICATIONS

During the PSC Inspection, it was noted that *no nautical publications were provided*.

SOLAS, Chapter V, Regulation 19.2.1 states that all ships irrespective of size, shall have, nautical charts and publications to plan and display the ship's route for the intended voyage and to plot and monitor positions throughout the voyage<sup>2</sup>. Also, SOLAS, Chapter V, Regulation 34, states that prior to proceeding to sea, the Master shall ensure that the intended voyage has been planned using the appropriate nautical charts and publications for the sea areas concerned, taking into account the guidelines and recommendations developed by the IMO.

According to SOLAS, Chapter V, Regulation. 27, nautical publications, such as sailing directions, list of lights, notices to mariners, tide tables, list of Radio Signals, shall be adequate and up to date. Electronic versions of nautical publications stated above may be carried on board as an alternative to hard copy nautical publications.

Dromon **Publication** on the carriage of publications on board ships outlines the requirements for the carriage of publications on board ships and includes a list with the updated editions of these publications.

## MEDICAL CERTIFICATE

During the PSC Inspection *medical certificates were missing for navigational watch rating (II-4) and an ERR (III-4)*.

According to MLC, 2006, Regulation 1.2, in order to ensure that all seafarers are medically fit to perform their duties at sea, seafarers shall not work on a ship unless they are certified as medically fit to perform their duties.

In urgent cases the competent authority may permit a seafarer to work without a valid medical certificate until the next port of call where the seafarer can obtain a medical certificate from a qualified medical practitioner, provided that:

- a. the period of such permission does not exceed three months; and
- b. the seafarer concerned is in possession of an expired medical certificate of recent date.

If the period of validity of a certificate expires in the course of a voyage, the certificate shall continue in force until the next port of call where the seafarer can obtain a medical certificate from a qualified medical practitioner, provided that the period shall not exceed three months.

Shipowners / Managers / Operators should ensure that their crew on board have valid medical certificates and those exist on board the vessels.

## COLLECTIVE BARGAINING AGREEMENT

Through the PSC Inspection it was noted that *no CBA was onboard*.

A Collective Bargaining Agreement (CBA) details all the terms and conditions of the crew employed on the ship. It specifies entitlements such as pay (in the form of a wage scale), working hours, termination of employment, repatriation/embarkation, crew's effects, medical attention etc.

According the MLC, 2006, Standard A2.1, where<sup>3</sup> a CBA forms all or part of a seafarers' employment agreement, **a copy of that agreement shall be available on board as well as during an inspection at any time.**

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<sup>2</sup> An electronic chart display and information system (ECDIS) may be accepted may be accepted as meeting the chart carriage requirements

<sup>3</sup> The CBAs may exist for seafarers originated from specific countries. Where a CBA exist, this should be referred to SEA and then the CBA should exist on board.

## SEAFARERS' EMPLOYMENT AGREEMENT (SEA)

Following the PSC Inspection, it was noted that *seafarers' employment agreement was not properly filled out to reflect actual registry.*

According to MLC, 2006, Standard A2.1, the purpose of SEAs is to ensure that seafarers have a fair employment agreement.

Each flag Administration need to adopt laws and regulations specifying the matters that are to be included in all SEAs governed by its national law. SEAs shall in all cases contain the following particulars:

- a. the seafarer's full name, date of birth or age, and birthplace;
- b. the shipowner's name and address;
- c. the place where and date when the seafarers' employment agreement is entered into;
- d. the capacity in which the seafarer is to be employed;
- e. the amount of the seafarer's wages or, where applicable, the formula used for calculating them;
- f. the amount of paid annual leave or, where applicable, the formula used for calculating it;
- g. the termination of the agreement and the conditions thereof;
- h. the health and social security protection benefits to be provided to the seafarer by the shipowner;
- i. the seafarer's entitlement to repatriation;
- j. reference to the collective bargaining agreement, if applicable; and
- k. any other particulars which national law may require.

Shipowners / Managers / Operators should ensure that their SEAs are always properly filled out to reflect actual registry.

## CHARTS

During the PSC Inspection, it was noted that *no charts were provided for ECDIS system.*

SOLAS, Chapter V, Regulation 27, refers that the nautical charts and nautical publications, such as sailing directions, lists of lights, notices to mariners, tide tables and all other nautical publications necessary for the intended voyage, **shall be adequate and up to date.**

## OTHER (MACHINERY)

Following the PSC Inspection, it was noted that *the main air receiver safety valves were tested and found set at 36 bars while max. operating pressure is 30 bars. Also, existing valves were previous year calibrated at 33 bars.*

Safety valves require proper planned routine maintenance for safe and efficient operation. These **should be set up and tested according to their manufacturer's instructions** during routine maintenance as well as during the vessel's surveys. The safety valves are required to be checked for lift (popping up) pressure as well as reseal pressure.

Ship Masters should follow the proper maintenance programme and ensure that the safety valves are correctly set up.

## MEANS OF CONTROL (OPENING, PUMPS) MACHINERY SPACES

During the PSC Inspection *the quick closing valve of tank 334 was found inoperative.*

Quick closing valves should be maintained and tested according the ship's planned maintenance system.

Quick closing valves should not be intentionally blocked or "gagged" in the open position to prevent operation. In cases where, temporarily, it is necessary to block a particular valve during testing or maintenance (e.g. to prevent loss of power or propulsion), care must be taken to return the blocked valve to operational condition immediately after completion of testing or maintenance.

ShipMasters should ensure the proper operation of the quick closing valves on board their ships.

## AUXILIARY ENGINE

Lastly, during the PSC Inspection it was noted that *the main switchboard ACB breaker to Emergency switchboard was not able to automatically rewind (motorized rewinding)*.

The Air Circuit Breaker (ACB) is one of the important safety devices used for the ship's generator, so high consideration should be given for safe and efficient operation. Maintenance and inspection of the ACB must be performed by the ships' mechanicals every month.

Ship Masters should ensure checking below important items for the ACB:

- Looseness of terminal screws;
- Dust and/or foreign materials;
- Open/close operation;
- Crack, damage, or discoloration
- Insulation resistance; and
- Roughness of main-contact surface.

## Act now

Surveyors / Auditors must take note on the above detainable deficiencies and give special attention during forthcoming class and statutory surveys and audits, irrespective of scope.

Shipowners / Managers / Operators are kindly requested to pay special attention into those deficiencies, note the Regulations requirements and to inform Masters on taking corrective actions, if necessary.