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CIRCULAR

DBS Port State Control Policies and Preventive Measures

With this Circular we wish to inform all parties concerned on the measures that have been set, to assist our fleet to achieving better PSC results and avoid any possible detention.

Notice to: Ship Owners/ Managers/ Operators | Surveyors/Auditors

C22009 | 09 February 2022

DromonClass has proceeded in an evaluation of the Port State Control cases that occurred in 2021 on board DBS Classed vessels. DBS has set a number of Port State Control preventive measures to assist all parties achieving a better performance and avoid any possible detention.

Owners/ Managers/ Operators/ Surveyors should take into serious consideration the below listed measures, actions and policies in order to comply with DBS requirements.

1. DBS Detention Policy

DBS would like to remind that **no vessel should be detained from PSC authorities.**

Owners/ Managers should note that in case their vessel will be detained, DBS shall evaluate their vessel's detention and take extra measures that might include, among others, issuance of a warning letter as well as suspension of their ship.

2. DBS Outstanding recommendations policy

We have noticed that following completion of classification and statutory surveys a number of imposed recommendations are not rectified prior the ship's departure from inspection port. Although recommendations and/or deficiencies are communicated to Owners/ Managers and Masters, these remain outstanding even after the completion of our survey **without prior notification** to DromonClass Head Office and the flag State, as applicable.

We wish to draw everyone's attention that **all recommendations** relating to classification and statutory certification **must be rectified prior departure from inspection port as well as issuance and/or endorsement** of any Classification and/or Statutory Certificate.

In case Managers/ Owners cannot rectify the imposed recommendation at the inspection port the following actions shall be taken:

- a. For recommendations relating to **Classification surveys** a Condition of Class shall be imposed, that **shall be rectified within a specified time limit**. Recommendations relating to class items are corrosion, structural defects or damage to hull, machinery and/ or equipment, which based on DromonClass Rules and in the opinion of the Surveyor affect the ship's classification status.
- b. For recommendations relating to **Statutory surveys**, Owners/ Managers must have the consent of the flag State for the recommendation not to be rectified before departure. The flag State **shall agree for the imposed recommendation to be rectified within a specified time limit**. The flag State may require the issuance of Conditional Statutory Certificate for the imposed recommendation to remain open for a specific time frame. In this case the Surveyor will be informed accordingly.

3. DBS PSC Preventive Actions

The DBS Port State Control (PSC) Preventive Action scheme aims to:

- a. eliminate the number of deficiencies on board our fleet;
- b. identify in advance of a PSC inspection any possible deficiency and therefore reduce the likelihood of a detention; and
- c. follow up deficiencies/ recommendations imposed by our Surveyors or PSC Authorities during previous inspections.

Eligible to the scheme is every DBS ship that calls a port of a PSC Authority of Paris MoU. Based on the Paris MoU tool, DBS will calculate the ship's profile with an aim to identify the next Port State Control Inspection in any Paris MoU Port.

Owners/ Managers will be notified that the vessel is due for an Inspection and advise them that their vessel shall be subject to an Occasional Attendance that shall need to be carried out **one (1) month prior the vessel's due date** for a Paris MoU PSC Inspection, at a convenient port of call.

During our attendance the DBS Surveyor:

- a. will use our PSC Checklist that can be found [here](#);
- b. will identify possible deficiencies as well as detainable deficiencies; and
- c. review corrective actions for deficiencies imposed during previous schedule surveys and/or PSC inspections.

Any identified deficiency during a PSC Preventive Action survey will be recorded at the official survey status report of the ship. In case the due date of the ship for a PSC Preventive Inspection Scheme survey falls within the window of a schedule survey (for e.g. annual/ intermediate surveys etc.) then the schedule surveys will be carried out.

Owners/ Managers that might not follow above scheme will bear any consequences that include among others, issuance of a warning letter as well as suspension of their ship.

4. Vessels' self-inspection

A self-inspection is to be carried out by the ship's crew prior to arrival into any Paris MoU port by using our **PSC Preventive Inspection Checklist**. The checklist should be submitted to DBS Head Office along with photos and/or videos as evidence that the inspection was performed.

If any of the items outlined in this checklist are not in good working condition or found not in compliance, the crew should take appropriate steps for a corrective action to be implemented prior to arrival into port.

5. Most Common detainable deficiencies

DBS Marine Division has listed the most common detainable deficiencies in Paris MoU for 2021, as shown in the table below. The ship's crew should take into consideration the below listed deficiencies and work towards the rectification of any of those that may exist on board their ship.

Fire Safety		Water/Weathertight Conditions	
07106	Inoperable fire detection and alarm system	03108	Damaged/seized ventilators
07115	Wasted/Inoperable fire-dampers	03105	Hatch covers wasted cleats and its spacers
07113	Malfunction of fire pump	03105	Hatch cover rubber gasket missing/wasted
07105	Poor closing condition of fire door	MARPOL Annex IV	
07123	Insufficient pressure from emergency fire pump	14402	Inoperative sewage treatment plant
Life Saving Appliances		MARPOL Annex I	
11101	Lifeboat engine not started easily	14104	Oil filtering equipment, 15 ppm alarm arrangements and discharge connection should be in good condition, properly calibrated, maintained and fully functional, with appropriate spares.
11104	Rescue boat engine not started easily	01315	Oil record book updated Excessive quantity in Oily bilge and Sludge tanks
11112	Inoperative davit for launching arrangements for survival craft	Structural Conditions	
11134	Emergency generator do not start automatically or manually	Emergency shut off valves of oil tanks inoperative	
11134	Inoperable emergency lights	02107	Ballast tanks heavily corroded/wasted
11108	Correctly mounted Hydrostatic Release Unit (HRU) on an inflatable liferaft	02113	Cracks in hull, keel plate connections and pin
Safety of Navigation		02114	Bulkheads heavily corroded/waste/holed
10111	Charts not updated	Propulsion and Auxiliary Machinery	
10111	Navigation charts for intended voyage not available	13101	Cleanliness of Engine Room insufficient
10116	Nautical publication not updated	13103	Gauges, thermometers inoperable/damaged
10116	Nautical Publication for intended voyage not available	ISM	
10114	Voyage data recorder (VDR / S-VDR) malfunction "system error"	15150	Records of inspection, maintenance, testing and drills and crew familiarization with fire and abandon ship drills
10109	Navigation lights damaged/inoperable	15150	Lifeboat weekly test conducted and recorded
10117	Echo Sounder malfunction	15150	Rescue boat weekly test conducted and recorded
10104	Main gyro compass not aligned with repeaters		
10127	Passage or Voyage plan not as per guidelines Res A.893		

DBS website

Please visit our website, where you can access various circulars, publications and get further support on many PSC related issues and deficiencies that may assist into preventing any detentions.

Act now

Ship Owners/ Managers/ Operators should take into consideration above policies and measures.

Owners/ Managers/ Operators that will not follow above measures and DBS Port State Control policies and measures will have the applicable consequences, which have been set as a result of the DBS PSC preventive measures.