

## PSC Related Circular

No.PSC **17/2020**

Dated: 24.08.2020

Subject:

## Detainable deficiencies



Resolution A.1138(31) is the latest PSC Guide issued by IMO which adopted on 4 December 2019.

In Appendix 2 "Guidelines for the detention of ships" is indicated a list of deficiencies (which is intended to **give guidance to the PSCO**), grouped under relevant conventions and/or codes, which are considered to be of such a serious nature that they may warrant the detention of the ship involved. This list is not considered exhaustive, but is intended to give examples of relevant items.

### AREAS UNDER SOLAS 1974

1. Failure of proper operation of **propulsion** and other **essential machinery**, as well as **electrical** installations.
2. Insufficient **cleanliness of engine-room**, excess amount of oily-water mixture in bilges, insulation of piping including exhaust pipes in engine-room contaminated by oil, and improper operation of bilge pumping arrangements.
3. Failure of the proper operation of **emergency generator, lighting, batteries** and switches.
4. Failure of proper operation of the **main and auxiliary steering gear**.
5. Absence, failure, insufficient capacity or serious deterioration of **personal life-saving appliances, survival craft and launching and recovery arrangements** (see also MSC.1/Circ.1490/Rev.1).
6. Absence, non-compliance or substantial deterioration to the extent that it cannot comply with its intended use of **fire detection system, fire alarms, fire-fighting equipment, fixed fire-extinguishing installation, ventilation valves, fire dampers and quick-closing devices**.
7. Absence, substantial deterioration or failure of proper operation of the **cargo deck area fire protection on tankers**.
8. Absence, non-compliance or serious deterioration of **lights, shapes or sound signals**.
9. Absence or failure of the proper operation of the **radio equipment** for distress and safety communication.
10. Absence or failure of the proper operation of **navigation equipment**, taking the relevant provisions of SOLAS 1974 regulation V/16.2 into account.

11. Absence of **corrected navigational charts**, and/or all other relevant nautical **publications** necessary for the intended voyage, taking into account that electronic charts may be used as a substitute for the charts.
12. Absence of **non-sparking exhaust ventilation for cargo pump-rooms**.
13. Serious deficiency in the **operational requirements** listed in appendix 7.
14. Number, composition or certification of **crew** not corresponding with **safe manning** document.
15. Non-implementation or failure to carry out the **enhanced survey programme** in accordance with SOLAS 1974 regulation XI-1/2 and the International Code on the Enhanced Programme of Inspections during Surveys of Bulk Carriers and Oil Tankers, 2011 (2011 ESP Code), as amended.
16. Absence or failure of a voyage data recorder (**VDR**), when its use is compulsory.

#### AREAS UNDER THE IBC CODE

1. Transport of a substance not mentioned in the Certificate of Fitness or missing cargo information.
2. Missing or damaged high-pressure safety devices.
3. Electrical installations not intrinsically safe or not corresponding to the Code requirements.
4. Sources of ignition in hazardous locations.
5. Contravention of special requirements.
6. Exceeding of maximum allowable cargo quantity per tank.
7. Insufficient heat protection for sensitive products.
8. Pressure alarms for cargo tanks not operable.
9. Transport of substances to be inhibited without valid inhibitor certificate.

#### AREAS UNDER THE IGC CODE

1. Transport of a substance not mentioned in the Certificate of Fitness or missing cargo information.
2. Missing closing devices for accommodations or service spaces.
3. Bulkhead not gastight.
4. Defective air locks.
5. Missing or defective quick-closing valves.
6. Missing or defective safety valves.
7. Electrical installations not intrinsically safe or not corresponding to the Code requirements.
8. Ventilators in cargo area not operable.
9. Pressure alarms for cargo tanks not operable.
10. Gas detection plant and/or toxic gas detection plant defective.
11. Transport of substances to be inhibited without valid inhibitor certificate.

## AREAS UNDER LL 1966 AND LL PROT 1988

1. Significant areas of damage or corrosion, or pitting of plating and associated stiffening in **decks and hull** affecting seaworthiness or strength to take local loads, unless properly authorized temporary repairs for a voyage to a port for permanent repairs have been carried out.
2. A recognized case of **insufficient stability**.
3. The absence of sufficient and reliable **information**, in an approved form, which by rapid and simple means enables the master to arrange for the **loading and ballasting** of the ship in such a way that a safe margin of stability is maintained at all stages and at varying conditions of the voyage, and that the creation of any unacceptable stresses in the ship's structure is avoided.
4. Absence, substantial deterioration or defective **closing devices, hatch closing arrangements and watertight/weathertight doors**.
5. **Overloading**.
6. Absence of, or impossibility to read, **draught marks and/or Load Line Marks**.
7. The means of **freeing water from the deck** not in satisfactory or operational condition.

## AREAS UNDER MARPOL ANNEX I

1. Absence, serious deterioration or failure of proper operation of the **oily-water filtering equipment**, the oil discharge monitoring and control system or the **15 ppm alarm** arrangements.
2. Remaining capacity of **slop and/or sludge tank** insufficient for the intended voyage.
3. **Oil Record Book** not available.
4. Unauthorized discharge **bypass** fitted.
5. Failure to meet the requirements of **regulation 20.4** or alternative requirements specified in regulation 20.7.
6. **Oily bilge water** and/or oil residue accumulated in machinery spaces.

## AREAS UNDER MARPOL ANNEX II

1. Absence of Procedures and Arrangements Manual (**P and A Manual**).
2. **Cargo** is not categorized.
3. No **Cargo Record Book** available.
4. Unauthorized discharge **bypass** fitted.

## AREAS UNDER MARPOL ANNEX III AND DANGEROUS GOODS CARRIAGE REQUIREMENTS

1. Absence of a valid Document of Compliance for carriage of dangerous goods (if required).

2. Absence of a Dangerous Cargo Manifest or detailed stowage plan before departure of the ship.
3. Stowage and segregation provisions of the IMDG Code chapters 7.1, 7.2, 7.4, 7.5 and 7.6 are not met.
4. Ship is carrying dangerous goods not in compliance with the Document of Compliance for carriage of dangerous goods of the ship.
5. Ship is carrying damaged or leaking dangerous goods packages.
6. Ship's personnel assigned to specific duties related to the cargo are not familiar with those duties, any dangers posed by the cargo and with the measures to be taken in such a context.

#### AREAS UNDER MARPOL ANNEX IV

1. Absence of valid International Sewage Pollution Prevention Certificate.
2. Sewage treatment plant not approved and certified by the Administration.
3. Failure of sewage treatment plant.
4. Ship's personnel not familiar with disposal/discharge requirements of sewage.

#### AREAS UNDER MARPOL ANNEX V

1. Absence of garbage management plan.
2. No garbage record book available.
3. Ship's personnel not familiar with disposal/discharge requirements of garbage management plan.

#### AREAS UNDER MARPOL ANNEX VI

1. Absence of valid International Air Pollution Prevention **Certificate** (IAPP Certificate) and where relevant **Engine** International Air Pollution Prevention **Certificates** (EIAPP Certificates) and Technical Files.
2. A **marine diesel engine**, with a power output of more than **130 kW**, which is installed on board a ship constructed on or **after 1 January 2000**, or a marine diesel engine having undergone a major conversion on or after 1 January 2000, which does not comply with the **NOx Technical Code 2008**, as amended.
3. The **sulphur content** of any fuel oil used on board ships exceeds the limit of **0.5% m/m** on and after 1 January 2020.
4. The **sulphur content** of any fuel used on board exceeds **0.1% m/m** while operating within a **SOx emission control area** as per the provisions of regulation 14.
5. Emission reduction by equivalent arrangements are not met.
6. An **incinerator** installed on board the ship on or after 1 January 2000 does not comply with requirements contained in appendix IV to the Annex, or the standard specifications for shipboard incinerators developed by the Organization (resolution MEPC.244(66)).

7. Ship's personnel are **not familiar** with essential procedures regarding the operation of air pollution prevention equipment.
8. Absence of valid **IEEC** (International Energy Efficiency Certificate).
9. Absence of a **Statement of Compliance** related to fuel oil consumption reporting on board.

### AREAS UNDER STCW 1978

1. Failure of seafarers to hold a **certificate**, to have an appropriate certificate, to have a valid dispensation or to provide documentary proof that an application for an endorsement has been submitted to the Administration.
2. Failure to comply with the applicable **safe manning requirements** of the Administration.
3. Failure of navigational or engineering **watch arrangements** to conform to the requirements specified for the ship by the Administration.
4. Absence in a watch of a **person qualified** to operate equipment essential to safe navigation, safety radiocommunications or the prevention of marine pollution.
5. Inability to provide for the first watch at the commencement of a voyage and for subsequent relieving watches persons who are **sufficiently rested** and otherwise fit for duty.

### AREAS UNDER AFS 2001

1. Absence of a valid International Anti-Fouling System **Certificate** or a Declaration on Anti-Fouling System.
2. **Sampling** proves it is non-compliant within the port's jurisdiction.

**Areas which may not warrant a detention, but where, for example, cargo operations have to be suspended.**

Failure of the proper operation (or maintenance) of inert gas systems, cargo related gear or machinery should be considered sufficient grounds to stop cargo operation.