

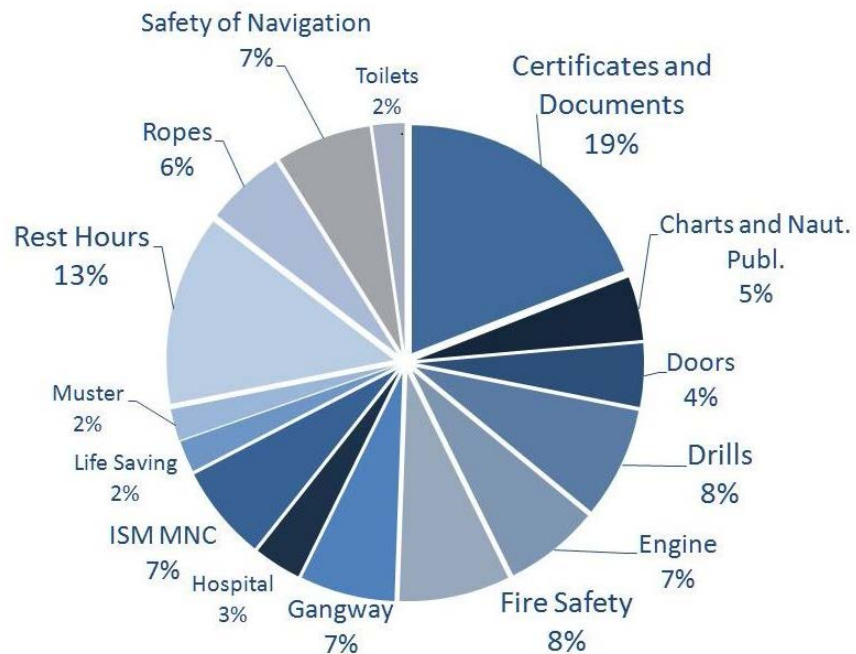


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The Substantial Increase of PSC Detentions in Romanian Ports

There has recently been observed a noticeable increase in detention rates as a result of findings in PSC inspections, under both the Paris and Black Sea MoUs, carried out by the Romanian Naval Authority. While 591 inspections have been resulted with 44 detentions within an entire year period during 2015 in the Romanian ports of Constanza, Midia and Mangalia, more vessels have been detained at the same ports due to found deficiencies, as the year 2016 has yet to be ended.

According to the results of monitorings carried out by Turk Loydu, it has been determined that PSC detainable deficiencies were centered upon some certain areas in particular. The Shipowners, Operators and Masters are recommended to take necessary actions and make improvements in these areas.



Most Frequent Detainable Deficiencies Detected During PSC Inspections in Romanian Ports

During 2016, the most common detainable deficiencies items found by Romanian Port State Control Officers and some measures to be taken against them are listed below. Bearing in mind that PSC inspections are not limited to this extent, Ship Owners, Operators and Masters are obliged to ensure the compliance of their own vessels with related rules and regulations by utilising ship-specific planned maintenance systems.

The Shipowners, Managers and the Officers should note that the topics included in this newsletter were prepared by analysing causes of the detentions experienced at Romanian ports in 2016, and it should not be considered that the topics not included in this newsletter will not be raised during PSC inspections.

1. Emergency Drills & Trainings

The most common detainable deficiencies found during Romanian PSC inspections arise in the context of Emergency Drills & Trainings. It appears that the crew members are not sufficiently familiarised with Contingency Procedures and Shipboard Safety Equipment due to circulation of seafarers continuously and busy voyage schedules. The Romanian PSC Officers require crew members to conduct FIRE, ABANDON SHIP, ENTRY IN TO ENCLOSED SPACES AND RESCUE drills in order to both evaluate crew's familiarisation and check the condition of the shipboard safety equipments. During these drills, PSC Officers determine that whether crew members fullfills and familiar to their assigned duties, in line with the ISM Code, SOLAS and relevant Flag State requirements, as indicated in the updated muster lists.



In addition to the safety drills can not be conducted in a consistent manner, also another defect is that the documentation, procedures and records regarding the drills which are not properly kept as per the requirements of the Safety Management System. All drills & trainings must be conducted as per SOLAS and MARPOL conventions requirements, should be included in an annual drill schedule as per time intervals prescribed in relevant conventions, and the drills & trainings should be conducted in accordance with such schedule and plans. All records, including log-book entries which must be kept for the drills and trainings conducted, must be properly maintained. The procedures for the emergency situations and entry into enclosed spaces in particular should be kept ready and updated on both muster lists, muster cards and safety management system documents.



In case of the drills are not conducted in a consistent manner as prescribed SOLAS, MARPOL or ISM Code and relevant Guidelines, or due to missing or inappropriate records of drills, PSCO shall detain the vessel immediately. For this reason all crew members are required to be familiar with the emergency situation procedures and safety equipments on board, and to perform their assigned duties during the drills as described in the muster list.

2. Fire Safety

Fire safety-related defects are the most common detainable deficiencies which were found, not only in Romanian PSC inspections but also in the PSC inspections carried out all over the world. In the context of fire safety, it appears that the corroded, inoperable or not properly closing fire dampers are recorded as the most-frequent detainable deficiencies in PSC inspections. The defective fire dampers, inoperable or not properly closing, jeopardizes the safety of ships and seafarers lives and health and seriously impair vessel's ability to fight fires on board especially where the engine room fires broke out. For this reason, the defective fire dampers, the case of not working properly fire dampers as required, are recorded as detainable deficiency during PSC inspections.



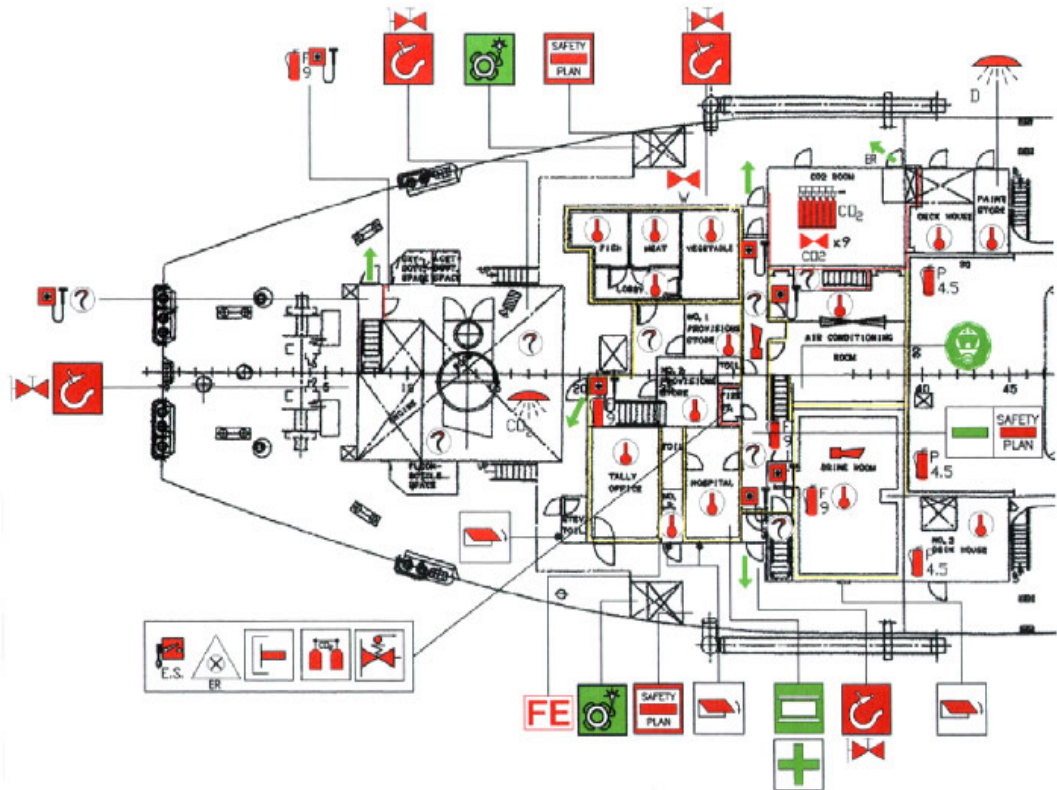
In the context of fire safety, another frequently detected deficiency in Romanian PSC inspections arises from not properly closing fire doors as required and the fire doors which are kept open by hold back hooks or tying up with a heaving line. The fire doors also play a major role in the fire safety and all fire doors which has not self closing mechanism should always be kept closed. The condition of the fire doors should be checked during fire drills.



In addition to above mentioned defects, PSC Officers shall check whether crew members have received sufficient familiarization with fire fighting equipment or not. The fire-fighting team's and assisting crew members' familiarization with fire fighting equipment shall be checked in terms of proper donning and correct use of equipment.

Ship Owners and Officers are recommended to apply below listed checks in order to prepare their vessels for PSC inspections:

- Ventilation flaps and dampers shall move freely with all parts in place
- The crew is to be familiar with the operation of fire dampers.
- Fire dampers/ducts indicated on the Fire and Safety Plan are to be marked, indicating clearly which space the damper serves.
- Operating handles and stoppers are to be in good working condition.
- Periodic maintenance and required tests of local and remote operation are to be carried out.
- Adequate testing procedures are to be stated in the vessel's PMS and/or SMS.
- Open/closed positions are to be properly marked on operating handles.
- The vessel-specific fire-training manual is to explain in detail the operation and use of fire and smoke dampers.
- The checking and operation of fire dampers and the main inlets and outlets of ventilating systems are to be included in regular fire drill scenarios.

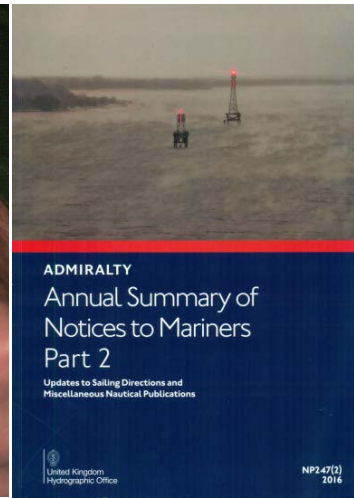


Because such kind of equipment are normally placed on weather decks and due to increasing ages of the ships, they should be always kept under control in accordance with Planned Maintenance Systems. Furthermore, it should be ensured that all critical equipment are in good order and working condition during pre-port arrival and departure checks. The records relating to all checks covered under PMS should be kept and maintained properly.

3. Nautical Charts & Publications

Missing or not updated nautical charts or publications were not considered ground for detention in Romanian PSC inspections previously. However detainable deficiencies in this context has began to appear as from 2016.

The necessary charts in appropriate scale, relevant permanent or temporary Notices to Mariners, Sailing Directions, List of Lights, Tide Tables, Nautic Almanacs, IAMSAR manuals for planning of intended passage or voyage should be kept available and up to date on board.



Shipowners and officers are recommend to check below listed nautical charts and publications and to keep updated them according to recently released relevant, permanent or temporary notices & circulars. Please note that it should not be limited to those below only, since the charts and nautical publications are required to be kept updated for intended voyages.

- BA 2282 – Plans in Romania
- BA 2284 – Constanta and Approaches
- BA 2230 – Constanta to Kefken Adasi
- BA 2214 – Black Sea including Marmara Denizi and Sea of Azov
- NP208 - Vol 8 Admiralty Tide Tables (SE Atlantic, W. Africa, Mediterranean)
- NP 24 – Admiralty Sailing Directions(Black Sea and Sea of Azov Pilot)
- NP 282, NP 285 – List of Radio Signals Vol 2 and Vol 5

Furthermore,

- Accurate, appropriate scale charts for intended voyage
- Charts Catalogue
- Latest editions of temporary, preliminary relevant and permanent (annual summaries) Notice to Mariners

4. Seafarers Hours of Work and Rest

Due to both concentrated inspection campaigns launched by Paris MoU together with the other PSC MoUs and the entry into force of the MLC 2016 Convention, it is observed that PSC inspectors focuses on this specific area and MLC 2016 related detainable deficiencies begin to increase.


In Romanian PSC inspections, the most frequently detainable deficiencies relating to this issue;

- The hours of rest were not being recorded correctly
- The watchkeeping personnel did not have sufficient rest.
- A bridge lookout was not being maintained.
- The ships not manned in accordance with the Minimum Safe Manning Document

The PSC inspectors compare and cross-check the records of hours of rest with other documents. For these reason, crew records of rest hours should be side-by-side checked and compared by the time and date information indicated in the records stated below.

- The log book records relating to channel, strait passages and manouvres etc.
- The time and date information relating to Muster and LSA/FFA drills held and the information regarding participant crew members.
- The time and date information relating to Bunkering, Garbage/Bilge disposal delivery operations and the information regarding the crew members assigned for these operations.


In this context, since Romania is not a party to MLC 2006 and this convention will come into force as from 24th of November 2016, it is of great importance that the Ship owners and Officers should strive to be fully compliant with rules and regulations relevant with the seafares hours of work and rest.



RECORD OF HOURS OF REST
Aug 2013
IMO STCW/2010

Vessel: MV Watchkeeper 3.3
IMO No: 1234567
Flag: United Kingdom

Seafarer (Full Name): 4 on 8 off
Position (Rank): 4 on 8 off
Watchkeeper: NO



Date	Periods of work are shaded																								Hours of work in 24h period	Hours of rest in 24h period	Comments	NOT TO BE COMPLETED BY THE SEAFARER			
	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23				24	Hours of rest in any 24h period	Hours of rest in any 7 day period	
01.08.2013																										8.0	16.0		16.0	112.0	
02.08.2013																											8.0	16.0		16.0	112.0
03.08.2013																											8.0	16.0		16.0	112.0
04.08.2013																											8.0	16.0		16.0	112.0
05.08.2013																											8.0	16.0		16.0	112.0
06.08.2013																											8.0	16.0		16.0	112.0
07.08.2013																											8.0	16.0		16.0	112.0
08.08.2013																											8.0	16.0		16.0	112.0
09.08.2013																											8.0	16.0		16.0	112.0
10.08.2013																											8.0	16.0		16.0	112.0
11.08.2013																											8.0	16.0		16.0	112.0
12.08.2013																											8.0	16.0		16.0	112.0
13.08.2013																											8.0	16.0		16.0	112.0
14.08.2013																											8.0	16.0		16.0	112.0
15.08.2013																											8.0	16.0		16.0	112.0
16.08.2013																											8.0	16.0		16.0	112.0
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18.08.2013																											8.0	16.0		16.0	112.0
19.08.2013																											8.0	16.0		16.0	112.0
20.08.2013																											8.0	16.0		16.0	112.0
21.08.2013																											8.0	16.0		16.0	112.0
22.08.2013																											8.0	16.0		16.0	112.0
23.08.2013																											8.0	16.0		16.0	112.0
24.08.2013																											8.0	16.0		16.0	112.0
25.08.2013																											8.0	16.0		16.0	112.0
26.08.2013																											8.0	16.0		16.0	112.0
27.08.2013																											8.0	16.0		16.0	112.0
28.08.2013																											8.0	16.0		16.0	112.0
29.08.2013																											8.0	16.0		16.0	112.0
30.08.2013																											8.0	16.0		16.0	112.0
31.08.2013																											8.0	16.0		16.0	112.0
																											248.0	496.0		16.0	112.0

The following national laws, regulations and/or collective agreements governing limitations on working hours or minimum rest periods apply to this ship:
NATIONAL LAWS TEXT

I AGREE THAT THIS RECORD IS AN ACCURATE REFLECTION OF THE HOURS OF WORK OR REST OF THE SEAFARER CONCERNED.

Name of master or person authorized by master to sign this record: NAME OF MASTER Signature of master or authorized person: _____ Signature of seafarer: _____

A copy of this record is to be given to the seafarer. This form is subject to examination and endorsement under procedures established by: United Kingdom (name of competent authority)

5. ISM Major Non-Conformities

Where a serious failure or the lack of effectiveness or systematic implementation of a requirement of the ISM Code is evidently detected on board of a vessel as a result of ISM related deficiency(s) found by PSC inspectors, an ISM Major Non-conformity is raised by PSCO. When a major conformity raised on a vessel, an additional audit is required to be carried out by recognized organization which issued ISM SMC document before departure in order to verify the effective actions has been taken for proper implementation of Safety Management System on board of the vessel.



In order to avoid ISM related non-conformities on board of the vessels; Safety Management System established by the Company should be implemented effectively and the accurate/up to date records of SMS implementation are required to be kept and maintained properly.

6. Concentrated Inspection Campaigns

Two separate concentrated inspection campaigns will be carried out by the Paris and Black Sea MoUs to which Romania is a party in the year 2016. The concentrated inspection campaigns for Paris MoU on Maritime Labour Convention (MLC 2006) and Black Sea MoU on Cargo Securing Arrangements will be carried out between the dates of 1st of September and 30th of November 2016.

More detailed information about Concentrated Inspection Campaigns is available on the TurkLoydu Newsletters web page.

[TL Newsletter 03/2016 - PSC Concentrated Inspection Campaign Maritime Labour Convention MLC 2006](#)
[TL Newsletter 04/2016 – PSC Concentrated Inspection Campaign on Cargo Securing Arrangements](#)

It is of a great importance that ship owners and officers prepare their vessels for concentrated inspection campaigns, by taking necessary actions according to guidance provided on Turk Loydu Newsletters, in order to avoid detentions in this context.

7. Crew Familiarization Trainings Level Of English Knowledge

After the detentions experienced in Romanian ports, Turk Loydu has held several negotiations with officials of Romanian Naval Authority and PSC inspectors in particular. During these negotiations, some difficulties with crew members awareness and especially regarding their familiarisation trainings for ship-specific emergency procedures, proper use of safety and radio-communication equipment in the ships called at Romanian Ports has been conveyed by the authorities. Although it is required that crew members should be provided proper familiarization trainings relating to emergency procedures and safety equipment, most of the time this requirement was not implemented effectively. Special attention is paid at crew familiarisation trainings during PSC inspections since this matter become even more important especially where the crew changes occur at more frequent intervals.

As a result of the negotiations has been held with Romanian PSC inspectors; crew members who were not provided sufficient familiarization trainings were designated as the root cause of the substantial rate of the PSC detentions. However, aside from that, it is stated that "In case the crew members level of English is not sufficient, an effective communication can not be kept between PSCO and crew members, and especially in case the Master's and key crew members' English knowledge levels are not sufficient even more serious problems arise."

The Romanian PSC inspectors also pay attention to qualification and familiarisation of the Bridge Team including GMDSS operators on GMDSS Equipment. During PSC inspections, Inspectors may request responsible personnel to conduct GMDSS Equipment tests including DSC tests.

The Ship owners and operators are invited to pay further due diligence in proper manning. To avoid further detentions, it is of great importance that the crew employment must be done in accordance with the Safety Management System and an effective familiarization training must be provided for new crew members on board.

8. Mandatory Ship Reporting Requirements

It has been determined that the problems identified relating to Mandatory Ship Reporting Requirements of Paris MoU, during the inspections carried out in Romanian Ports. Any failure to comply with the rules of a mandatory ship-reporting system may result even with a serious detention.

A ship has to report 24 hours (24 ETA) before arriving at a port or anchorage of the Paris MoU region or before leaving the previous port or anchorage if the voyage is expected to take less than 24 hours. Thus, this pre-arrival notification has to be reported to all ports in the Paris MoU region the ship calls. The 72 hours reporting obligation (72 ETA) is required when the ship is due for an expanded inspection.

The detailed information regarding reporting obligations can be found Paris MoU website

<https://www.parismou.org/inspections-risk/reporting-obligations>

In addition to periodic reports, in case the reports of following concerns are received by the PSC Administrations in the ships on arrival;

- The ships reported by PSC Administration and/or relevant MoU Secretariat
- The ships which have been reported as being deficient by pilots or port authorities/ VTS staff
- The ships which has failed to comply with the Mandatory Reporting requirements
- The ships with unrectified non-conformities (the ships are subject to an internal audit within 3 months with action taken code "18")
- Inspection would be carried out of ships which have been permitted to leave the port of a state with deficiencies to be rectified
- The ships of which inspections initiated upon receipt of the complaints that are made by seafares under MLC 2006 Convention
- Ships which has been involved in any kind of accident such as grounding, collision or stranding on the way to a port
- The ship which are carrying dangerous or polluting goods and have failed to report relevant information would be inspected
- Ships which have been suspended from the class in the preceding 6 months
- Ships which have been subject of a report or notification by another PSC authority
- The ships which are accused of an alleged violation of the provision of IMO as to pose a threat to the ship's crew, property, or environment

9. The Port State Control Inspection Regime

According to rules of Paris Memorandum of Understanding (MOU) and the other 8 PSC inspection regimes, the various targeting systems are used for selection of the vessels which are subject to PSC inspections. The inspection time schedule of the vessels are determined by means of these targeting systems. The PSC Administrations may also decide to inspect vessels due to various reasons except these targeting methods.

In order to be prepared against PSC inspections, it has importance to foresee when vessels will be inspected. For this purpose, the rules of the PSC MoUs targeting systems should be well understood.

Therefore the ship owners and operators can calculate the risk profiles of their vessels and management and determine inspection periods by using the calculation tools placed on the Paris Mou web site.

Generic Parameters		Weighting points to high risk profile	Eligibility to low risk profile
Type of Ship	<input type="text"/>		All types
Ship is older than 12 years	Yes <input type="radio"/> No <input type="radio"/>		All ages
Flag	<input type="text"/>		
Flag Performance	<input type="text"/>		
Flag is IMO audited	Yes <input type="radio"/> No <input type="radio"/>	Not applicable	
All Certificates issued by Flag	Yes <input type="radio"/> No <input type="radio"/>		
Recognized Organization	<input type="text"/>		
Performance	<input type="text"/>		
Is EU recognized	Yes <input type="radio"/> No <input type="radio"/>	Not applicable	
ISM Company Performance	<input type="text"/>		
Historic Parameters from the last 36 months			
At least one inspection	Yes <input type="radio"/> No <input type="radio"/>	Not applicable	
All inspections with 5 or less deficiencies	Yes <input type="radio"/> No <input type="radio"/>	Not applicable	
Number of detentions	<input type="text"/>		

Turk Loydu continues to provide services to Turk Loydu classed vessels with full time employed expert staff with surveyor/auditor qualification in its Romania office opened in 2015. Ship Owners and Masters are recommended to in from Turk Loydu in case any problem during PSC inspection.

The preparation check list for PSC inspections may be accessed through the Turk Loydu web site fr further information.

<http://www.turkloydu.org/en-us/publications/port-state-control.aspx>

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