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## Port State Control - Recurring Deficiencies

Notice to ship owners, managers, Masters, Approved Nautical Inspectors, Recognised Organisations and surveyors

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### 1. Purpose

- 1.1. This Information Notice is to bring to the attention of Companies operating Bahamian ships a number of recurring deficiencies raised at Port State Control (PSC) inspections that resulted in a PSC detention.

### 2. Application

- 2.1. This Notice is applicable to all Bahamian ships on international voyages that visit ports of countries outside The Bahamas.

### 3. General

- 3.1. The Bahamas Maritime Authority (BMA) as a Flag State Authority is committed to ensuring that all Bahamian ships are always fully compliant with international Convention requirements and national regulations and fully supports the objectives of the PSC inspection process in eliminating sub-standard shipping.
- 3.2. Analysis of detainable deficiencies recorded against Bahamas flagged ships has identified the following unacceptable, easily identifiable and wholly avoidable deficiencies:
- i. Deficiencies/failures have not been reported to the BMA or Classification Society (Recognised Organisation) for agreed acceptance pending temporary arrangements in place;
  - ii. Any arrangement that bypasses essential safety or environmental monitoring equipment (e.g. "magic pipes" bypassing Oily Water Separator (OWS)/15ppm monitor);
  - iii. Equipment has been poorly maintained and/or maintenance has been inappropriately documented or not documented within the shipboard planned maintenance system (PMS);
  - iv. Crew are unfamiliar with essential equipment or systems they are responsible for (e.g. OWS, ECDIS, GMDSS equipment, etc.);

- v. Equipment which requires Flag State/Classification Society approval has been fitted, modified, or removed, or structural changes have been made without proper consultation with the Flag State/Classification Society/Recognised Organisation;
  - vi. Critical equipment has not been subject to regular testing as required (e.g. emergency equipment such as fan dampers and emergency fire pump);
  - vii. Logbooks, record books, hours of rest records and other documents are incomplete or inaccurate. It should be noted that PSC authorities may in some cases instigate criminal proceedings for alleged falsification of records where records are incomplete or inaccurate (in particular for hours of rest records and Oil Record Books).
  - viii. Navigation conducted in an unsafe manner. Whether by the use of out of date publications or incomplete passage plans, or by avoidable violations of the COLREGs such as lights, shapes and sound signalling devices not in working condition.
- 3.3. It should be noted that even though individual minor deficiencies may not qualify to be graded under Code 30 (detention), multiple minor deficiencies can be linked to failure of the Safety Management System (SMS) and result in detention of the ship. Multiple deficiencies cannot be expressly quantified in number because certain PSCOs may consider five (5) deficiencies sufficient to justify detention whilst others may not detain a ship even with 10 deficiencies. Hence, it is recommended for ship's senior management to take a round on deck and engine room with an aim to identify minor deficiencies and rectify prior to arrival port.
- 3.4. Further advice is provided in the following sections for recurrent PSC deficiencies based on the specific risk area.

#### **4. Fire Safety**

- 4.1. There have been several PSC detentions involving defective firefighting and fire prevention equipment.
- 4.2. It is a requirement of Regulation 14.2.1 of Chapter II-2 of the International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS) that all firefighting equipment shall be kept in good order and readily available for use.
- 4.3. It is also a requirement of Regulation 11(c) of SOLAS Chapter I that any defects which affect the safety of the ship or its continued compliance with statutory requirements are to be reported to the flag administration and the Recognised Organisation who issued the affected certificate on behalf of the flag administration.
- 4.4. **The deliberate deactivation of firefighting and fire prevention systems, without due cause, is not acceptable.** Where such circumstances are brought to the attention

of the BMA they will be investigated and, where appropriate, further action will be taken by the BMA.

4.5. The most recurrent recent deficiencies related to fire safety are specifically due to:

- i. Fire doors condition; held open by hooks/ropes, defective sealing material, defective latches doors closing either too slow, too quickly, or not at all.
- ii. Fire dampers; operational remotely but not locally, able to operate from either control but not closing entirely, corrosion preventing full closure.
- iii. Fuel oil leaks; pipelines leaking fuel oil
- iv. Fire pump and its pipes; insufficient pressure and/or not operational

4.6. Fire Doors

4.6.1. All owners, managers and masters of Bahamian ships are to ensure that all firefighting and fire prevention equipment shall be kept in good order and readily available for use. The following deficiencies should be noted in particular:

- i. gasket seals badly damaged causing door to not seal correctly;
- ii. doors either do not move at all when operated locally, or close too slowly. Some fire doors were flagged for closing too quickly, thus giving personnel insufficient time to react in an emergency.

4.7. Fire Dampers

4.7.1. Deficiencies related to fire dampers are considered major deficiencies and generally warrant the detention of the ship.

- i. Crews should ensure that fire dampers which are required to be closed remotely, can still also be closed locally as well.
- ii. During testing, crew should verify that full closure is achieved by physically looking at the damper itself and not just relying on the position of the indicator. There have been instances where dampers have been indicated as closed but are held open by corrosion or some other object blocking the damper.

4.8. Fuel Oil Leaks

4.8.1. Fuel oil leaks are considered a major deficiency as they present a significant fire risk. The presence of fuel oil leaking in combination with various sources of ignition in the engine room have resulted in catastrophic fires in the past, which is why fuel oil leaks should be contained and repaired as soon as possible.

4.8.2. In addition to the fire risk, leaking fuel also contributes to an unsafe working environment for the crew and can increase the risk of slips, trips and falls in the workplace. In this regard some PSCOs will record fuel or lube oil leaks as a Maritime Labour Convention (MLC) deficiency in addition to the SOLAS aspect.

#### 4.9. Fire Pump and its Pipes

4.9.1. A ship's fire pumps are some of the most basic but also most essential firefighting equipment on board. It is essential that these pumps are tested as per the ships PMS without fail.

4.9.2. Should the ship need to take one of the SOLAS required fire pumps out of service due to a failure and/or regular service, crew members should be aware of which pump to use in the place of the main fire pumps as per Regulation 10.2.2.1 of SOLAS Chapter II-2 and be able to demonstrate this to the PSCO as required.

### 5. **Life Saving Appliances**

5.1. The are of Life Saving Appliances (LSA) has also been recorded in several detainable deficiencies recently with 23 detainable deficiencies recorded in 2022 and with a similar trend for the first and second quarter of 2023.

5.2. The most common detainable deficiencies for LSA are:

- i. Stowage of survival crafts
- ii. Launching arrangements for survival crafts
- iii. Maintenance and inspection of LSA
- iv. Crew unfamiliarity with operation of LSA

#### 5.3. Stowage of survival craft.

5.3.1. This deficiency has been cited against liferafts and rescue boats. With liferafts, several instances were noted of expired hydrostatic release units being in place which the crew was unaware of. There was also an instance of excessive lashing on a liferaft which would prevent the float free arrangements from operating as designed.

5.3.2. For the rescue boats and particularly with rescue boats which are not lifeboats, deficiencies were cited for boats not being connected to the davit at time of inspection. While this in itself is not a deficiency, the crew must be able to demonstrate the full launching of the rescue boat in the water within the 5 minutes required by Regulation 14 of SOLAS Chapter III – this must be inclusive of the time it takes to connect the davit hook.

#### 5.4. Launching arrangements for survival craft

- 5.4.1. Launching arrangements have been cited in the past particularly with some frequency and several of the deficiencies have been noted as detainable. Most commonly would be deficiencies related to the davit. The davit must be able to function as designed and this is to include limit switches, condition of wire ropes, emergency source of power (including accumulators where applicable).
- 5.4.2. The launching arrangements have also been cited because of the resting position of the lifeboat at the boarding position. Crew are to ensure that tricing pendants and/or other devices to keep the lifeboats alongside are operating as intended.
- 5.4.3. Inclusive of the launching arrangements would be the recovery requirements for rescue boats. This too should be checked by the crew during regular drills. Regulation 17.4 of SOLAS Chapter III requires a rescue boat to be recovered within 5 minutes. Any defects which can affect the davit and/or its motor will also affect the speed of recovery.

#### 5.5. Maintenance and inspection of lifesaving appliances

- 5.5.1. LSA are to be inspected as per SOLAS requirements and as per the company's SMS procedures. All required inspections and maintenance are to be properly recorded as required in the SMS logs and or ships logbook. It is important to remember that during an initial inspection it is quite possible that a check of documentation and logbook entries can be the extent of the inspection. If documentation and logbook entries are not as required it **will** trigger a more detailed inspection and could lead to more deficiencies being identified.

#### 5.6. Crew unfamiliarity with operation of LSA

- 5.6.1. With most PSC inspections, even in cases where the PSCO has not requested a drill, crew members will be asked questions regarding specific duties and functioning of equipment. It is important that crew members who have responsibilities on the muster list are familiar with those responsibilities. If the PSCO determines that a crew member is unfamiliar with required duties this again **will** trigger a more detailed inspection and could lead to more deficiencies being identified.

### 6. **MARPOL Annex I (Oil)**

- 6.1. Compliance with Annex I of the International Convention on the Prevention of Pollution from Ships 1973, as amended (MARPOL) is one the most common items subject to inspection on any PSC inspection.

- 6.2. The most common recent deficiencies related to MARPOL Annex I are:
- i. Crew unable to demonstrate correct operation of the OWS;
  - ii. Crew not able to conduct the 15ppm oil content monitor (OCM) function test;
  - iii. Previous Oil record books (ORB) not available (these should be preserved for a period of three years after the last entry has been made);
  - iv. ORB missing entries of weekly sounds of oil residues in tanks listed in the supplement to the IOPP Certificate;
  - v. Incinerator refractory deteriorated;
  - vi. Unauthorized modifications to OWS and OCM.
- 6.3. Deficiencies indicated in 6.2 above may be indicative of failings in the effectiveness or implementation of the company's SMS, which could warrant detention of the ship and to a request for additional external audits by PSC prior to the ship being allowed to depart port.
- 6.4. The BMA recommends that the following steps be considered by the company to enhance engine room crew members' awareness of OWS and 15ppm oil content monitor operations and the ORB procedures:
- i. Produce a set of clear instructions for Chief Engineer Officers and other Engineering Officers with regards to correct and consistent entries in Oil Record Book;
  - ii. Produce a ship-specific set of instructions addressing correct OWS operation and include same within the on-board training program for all engine room crew;
  - iii. Include bilge holding tank internal inspection and cleaning, where necessary, in the ship's planned maintenance system;
  - iv. Include OWS and 15ppm oil content monitor operational tests in the ship's PMS. Should such tests be unsuccessful, the BMA and ships Classification Society should be informed immediately so that suitable short-term arrangements can be agreed.

## **7. Further Information**

- 7.1. The previous revisions of this Notice are available on request.
- 7.2. A Pre-arrival checklist based on the most frequent recurrent deficiencies is provided in the Annex to this Notice to assist with preparation for PSC inspections and is available for download as [FORM060](#).

## **8. Queries**

- 8.1. Any queries on this Notice may be submitted to [tech@bahamasmaritime.com](mailto:tech@bahamasmaritime.com) or any BMA office.



**Annex 1**



**PRE ARRIVAL CHECKLIST TO PREPARE FOR PSC INSPECTIONS**

Based on detainable deficiencies and intended to be used for guidance.

<b>Category</b>	<b>Conditions to Verify</b>	<b>Verified</b>	<b>Comments</b>
<b>Fire Safety</b>	Fire dampers are of proper working condition, tested and examined .	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Quick-Closing valves operational, maintained, labelled, capable of closing and being reset	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Fire Detection System operational on main and back-up power with no faults	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Main and Emergency fire pump(s) operational, maintained and meets functional requirements	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Fire extinguishers stowed correctly, sufficiently charged, and clearly labelled with service/inspection date	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Firefighting system operational and maintenance for respective system carried out as per company's PMS	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Fire doors capable of being closed without obstruction. Quick release fire doors close upon activation of fire alarm. Seals in good condition.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Fire hoses in acceptable condition to be used, free from leaks and dry rot.	YES <input type="checkbox"/> NO <input type="checkbox"/>	



	Correct diameter and length for stowed location.		
	Fire mains and hydrants throughout ship in good condition, valves and drains able to operate freely. No pinholes or excessive corrosion prevalent.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Fire Control Plans updated and stowed in appropriate location.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Defects as it relates to Fire safety of the ship have been identified and reported as per company's SMS.	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
	Penetrations through bulkheads, overheads and decks properly sealed and insulated.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
<b>ISM</b>	Ships statutory certification is up to date and available.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	SMS contains, and crew fully understands, all policies as it relates to safety and environment protection.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Contingency plans established, practiced through drills, recorded and updated appropriately.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Company's, DPA, and Master's responsibility understood and enforced.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Company undertakes review, evaluation and verification of all ISM documentation which is available on, or accessible by their ships.	YES <input type="checkbox"/> NO <input type="checkbox"/>	

<b>LSA</b>	Lifejackets with lights and whistles are in good condition.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Liferafts have been serviced by an approved service provider, properly secured, required equipment inside launching arrangements satisfactory.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Liferaft HRU's correctly connected with relevant service certificates	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Lifebuoys condition satisfactory, legible ship markings visible.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Lifeboat/Rescue boat is in good condition structurally, mechanically and operationally	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Lifeboat/Rescue Boat launching appliances and associated systems maintained and operational	YES <input type="checkbox"/> NO <input type="checkbox"/>	
<b>MARPOL</b>	All MARPOL recording books as per ships application is filled out accurately, signed by C/E and Master and available for inspection whether physical or digital.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	OWS and associated systems functional with a readable OCM display, and maintained as per PMS without unauthorized modifications.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Sewage Treatment Plant functional and serviced as per PMS.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Incinerator condition is satisfactory with certification, alarms and associated safety devices functional.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
<b>STCW</b>	Crew are familiar with ship, medically fit, and have up to date the relevant qualifications for their position while being familiar with company's SMS policy and procedures.	YES <input type="checkbox"/> NO <input type="checkbox"/>	

<b>MLC</b>	Crew Seafarers Employment Agreement (SEA), medical and statutory documents for each rank are up to date. Otherwise, circumstances requiring extensions/exemptions been reported or requested.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Rest hours accurately recorded with explanations for any non-conformities	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Wages have been paid, provisions are sufficient, crew accommodation liveable with necessary comfort and amenities.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Ship is sufficiently manned with qualified crew members for ships purpose.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Medical care, on board complaint procedures adequate and available to crew.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
<b>NAVIGATION</b>	Publications, charts and passage plans updated, logged and readily available to be used or displayed.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	All essential navigational equipment in good working order, are serviced accordingly and where applicable, have their certification updated and accessible.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Navigational lights, shapes and sound signalling equipment in good working order	YES <input type="checkbox"/> NO <input type="checkbox"/>	
<b>SHIP CONDITION</b>	Hull, deck and structural integrity, air pipes and ventilators, accommodation ladders, load line marks are in standard with LLC.	YES <input type="checkbox"/> NO <input type="checkbox"/>	

<b>ENGINE ROOM</b>	E/R cleaned, has sufficient lighting, oil leaks rectified, lagging and lashings are appropriate and not soaked in oil and critical spares available, with any defects already reported.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Steering gear functioning with no defects, gyro repeater has no deviation error, and no evidence of hydraulic leaks	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	Emergency Generator operational on primary and secondary means of starting and capable of carrying rated load.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	E/R electrical panels fault free and insulated matting is in good condition.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
	All emergency lights and exits operational and clearly marked, free from obstruction.	YES <input type="checkbox"/> NO <input type="checkbox"/>	
Items identified while conducting pre-arrival checklist found out of compliance, requiring further attention:			
Items identified while conducting pre-arrival checklist previously reported to company, Flag, Class, requiring further attention:			
Additional Comments:			

Responsible Officer: \_\_\_\_\_

Master: \_\_\_\_\_

Responsible Officer: \_\_\_\_\_

C/E: \_\_\_\_\_

Date & Time: \_\_\_\_\_

Ship Stamp: \_\_\_\_\_