

Date :08-03-2016

No.002/P.M.S/T.P/16

PSC Publication

Page No (17)

Pacific Marine Services Requirements of the (PSC Inspection Regime) – (Bridge the gap)

Notice to:

Ship Owners / Manager / operators / Surveyors

Dear Sirs,

This publication aims to assist ship Owners and Managers to familiarize requirements of the port state control. as the required to be on shipboard. The publication has been prepared by P.M.S Technical departments, To avoid detain all the ships registered under PMS Classification society.

Contents:-

- 1- these deficiencies lead to ship detention
- 2- comparing the PSC inspection results
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- 4- news from Port State Control Authorities
- 5- Recommendation to Owners/Managers/Operators
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These deficiencies lead to ship detention

That The most frequently areas of deficiencies that result in the detention of a ship are:

- > Fire Safety
- > Safety of Navigation
- Emergency Systems
- Life Saving Appliances, and
- Certificates and Documentation Crew Certificates

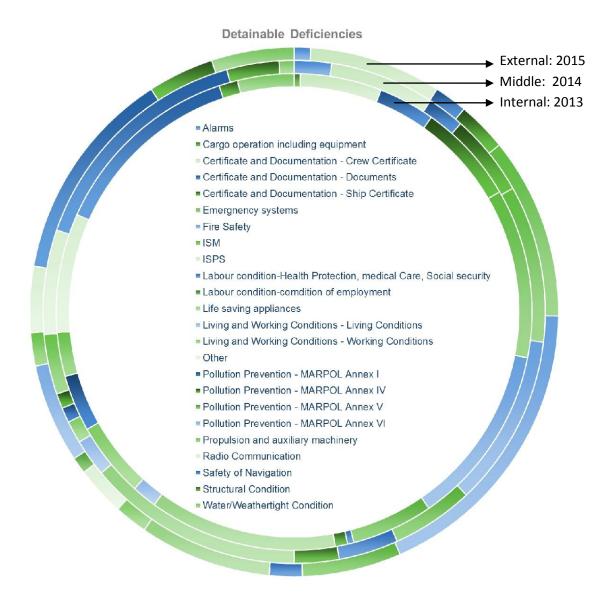
And that the Other frequent areas of deficiencies that result in the detention of a ship are: ISM related, Propulsion & Auxiliary Machinery, Water/Weather Conditions, Structural Conditions, Radio Communication, Certificates and Documentation-Ship Certificates, Pollution Prevention-MARPOL Annex I, Living Conditions, Labour Condition, Certificates and Documentation-Documents, Pollution Prevention-MARPOL Annex VI, Alarms.



Comparing the PSC inspection results.

Following an analysis of PSC inspections for the first semester in 2015, it is observed that deficiencies imposed on vessels are related with eighteen (18) out of twenty six (26) areas of deficiencies.

Comparing this year results with previous years, it is concluded that the number of detainable deficiencies has been increased by 12% from 2014 and 1% from 2013. It is clear that the total number of detainable deficiencies has increased this year. The increase of detainable deficiencies is not only recorded in the frequent areas but also in other areas of inspection.





Concentrated inspection campaigns.

Inspect about the Crew Familiarization for Enclosed Space Entry.

Port and Flag State inspection department in co-operation with the Survey department that notification concentrated inspection campaign about the Crew Familiarization for Enclosed Space Entry.

This has been circular by PMS in advance of the official on same subject by Paris and Tokyo MoUs aiming to prepare all vessels to be in compliance with the requirements of SOLAS.

2016 CIC of Paris MoU in co-operation with Tokyo and Med MoUs

The 48th Committee meeting took place at Noordwijkerhout, the Netherland form 18 to 22 May 2015, where a CIC on Maritime Labour Convention has been announced to commence from September to November 2016. The CIC aims to verify compliance on board ships with the Convention requirements after three years of entry into force.

PMS will inform everyone in due time on the requirements of this CIC and provide further guidelines.

Results of CIC on Hours of Rest performed by the Paris MoU

The CIC was carried out on all ships targeted for inspection within the Paris MoU Region from 1st of September 2014 until 30th of November 2014 and the questionnaire was completed on total 4,041 ships.

A total of 16 ships were detained as a direct result of the CIC Questionnaire. Whilst the detention rate appears low (0.4%) it has to be borne in mind that detention was not always the most appropriate action, as the breach of hours of rest may have happened in the past.

In 11.2% of cases (449) the hours of rest were not being recorded correctly and in 5.1% of cases (203) the watchkeeping personnel did not have sufficient rest. In 2.5% of cases (101) a bridge lookout was not being maintained.

A total of 27 ships were not manned in accordance with the Minimum Safe Manning Document of which 5 were detained for non-compliance. A total of 837 inspections (20.71% of total CIC inspections) had one or more CIC related deficiencies recorded. The most common deficiency was related to "Records of seafarers' daily hours of work or rest" (STCW Section A-VIII/1 (7)) which was recorded in 492 cases.

A total of 912 CIC-topic related deficiencies were recorded.

news from Port State Control Authorities:

The 2014 Paris and Tokyo MoUs Annual PSC report has been released. The report aims to update and notify Classification Societies, Recognize Organizations, Flag Administrations, Owners, Managers, Operator, etc. on future developments of the two MoUs, performance of R.Os and Flag Administrations as well as statistical results on PSC inspections and CICs held on board merchant ships trading in these areas.

In more detail the annual report includes:

- 1- General Information
- 2- Developments
- 3- Facts & Figures in 2014
- 4- Statistical Results in 2014
- 5- Concentrated Inspection Campaign
- 6- Training
- 7- Performance of R.O and Flag Admirations in 2014
- 8- Understanding on Port State Control



Recommendation to Owners / Managers / Operators

In order to assist Owner/Manager/Operators to ensure that vessel are in compliance, that the PMS has prepared a checklist with all items may checked during before PSC inspection. Attached to this Publication you may find the PSC Checklist which will be followed by PMS surveyor during periodical surveys in order to help PMS vessel to avoid detention. Moreover, this checklist could be also used by Masters and/or Crewmembers of the vessel for her readiness prior arrival to any port of call.

ACT NOW

To the Owners of vessels / Managers / Operators.

This publication aims to assist ships as required what the Inspection checklist by the port state control, in order to avoid possible deficiencies.

Thanks on kind cooperation with us.

Kind Regards,

CONTACT US





P	SC	
IN	NSPECTION CHECKLIST	
Ship name	,	-
Imo no		-

Certificates Valid & Correctly Endorsed (as application of the correct of the cor					
Flag Registry Certificate	YES	NO	N.A		
Radio Station License			= 11		
Class Certificate					
Safe Manning Certificate					
Tonnage Certificate	IN A				
Load Line Certificate					
Safety Construction Certificate					
Safety Equipment Certificate	73	000			
Safety Radio Certificate					
IOPP Certificate					
Sewage Pollution prevention Certificate		1			
Air Pollution Prevention Certificate					
Chemical Fitness Certificate					
Gas Fitness Certificate	Lak MA				
Grain Loading Certificate	CAN Y				
Document of Compliance with the Special Requirements for Ships Carrying Dangerous Goods					
Exemption Certificate(s) if any					
Safety Management Certificate (SMC)					
Document of Compliance (DOC)					
International Ship Security Certificate					
Maritime Labour Certificate (MLC)					
Antifouling System Certificate					



STCW				
Item	Addressed			
Crew on board is in accordance with the requirements as per Safe Manning Certificate.	YES	NO	N.A	
Master, deck officers, engineer officers and ratings have a Certificate of competence available.				
Officers' license have endorsements by the Flag Administration as appropriate .				
Crewmembers have a valid medical examination Certificate .				
New crew members on board are familiar with their duties, responsibilities and the safety equipment .				
Rest hours documentation of the crew duly signed and readily available .				
Table of working hours is posted and is easily accessible				

HULL				
Item	Addressed			
Ship's side shell plates without damage and excessive wastage (as far as visible).	YES	NO	N.A	
Bulwarks, handrails and cat walks without signs of damage and excessive wastage.	>			
Cargo holds structure without damages and excessive wastage (e.g. bulkheads, frames, brackets, tank tops etc.).				
Hatch cover arrangements including gaskets in good condition to close watertight, without signs of wastage.		5		
All closing appliances in good working condition				
Ventilators and air pipes including any closing appliances properly working without signs of damage or wastage and able to close air- tight				
Closing devices of all sounding pipes properly working	9			
Weather tight doors and small access hatches in good condition and close watertight		7		
Draft marks and Plimsoll marks painted in different colour	/ 6	V /		
Plimsoll marks permanently marked on hull in accordance with the Load Line Certificate	ý	16		



Item	1	Addressed	
Electric cable arrangements properly installed and insulated (no loosing wires)	YES	NO	N.A
Light covers properly fixed			
Around the electrical main switchboard is provided an insulation mat			
Engine room in clean condition			
Main propulsion system is working properly			
Auxiliary engine and power system including 100% power redundancy working properly		9.1	
Emergency generator arrangement for immediate supply of electrical power working properly			
Jacketed piping system on high pressure fuel lines properly installed and alarms working			
Exhaust and vapour pipes properly insulated			
Engine alarm arrangements working properly All			
Engines and piping systems free of leakage			
Anchoring equipment in good condition			
Mooring ropes in good condition	1	(0)	
Oily water separation system in good working condition together with testing			
arrangements and the c <mark>rew is familiar w</mark> ith the system and its use			
15ppm alarm and stopp <mark>ing arrangemen</mark> ts in good working condition			
Piping arrangements in good condition (no signs of damage and/or corrosion)			
Bilges and other machinery areas free of excessive oil			
Oil record book is updated, entries are correct and periodically signed by the Master (codes used are correct and tanks listed as per IOPP Certificate)		4	
Manuals for tankers, chemical tankers and gas carriers available on board	/ 10		
SOPEP available and approved on board (includes updated communication data of Focal Point List as per IMO)	~	4	
SMPEP available on board (for ships certified to carry Noxious Liquid substances in bulk) with updated Focal Point List	5 1		
Garbage is collected and separated in closable bins as required and garbage record book entries are correct			
Onboard readily available proof that while navigating in restricted areas low			
sulphur fuel is used			
Crew is familiar with the sewage system and the treatment plan. Necessary drawings available on board.			



Item Addressed				
Lifeboats with all parts in good condition without wastage, blocks and release mechanisms properly maintained and the crew is familiar with safe use of launching and release gear	YES	NO	N.A	
Lifeboat inventory complete and in good condition with dates of expiration for pyrotechnics and foodstuff rations recorded and not outdated.				
Rescue boats complete and in proper condition with the inventory stored as required.				
Lifeboat/rescue boat engines in good working condition and starting easily. Life rafts and launching arrangements in good working condition and properly marked.				
Hydrostatic release for the rafts correctly connected and not outdated.				
Equipment for embarkation for additional life raft available (raft at the bow).				
Launching arrangements for rescue boats and life rafts including limit switches in good condition and without wastage.				
Annual thorough examination of the launching appliances and on-load release gear has been carried out and relevant documentation available onboard.	5			
Embarkation ladders including their shackles and pad eyes on deck in good condition.) (0		
Wire falls of all launching/recovery arrangements in good condition and renewed as required.		70		
Lifebuoys (including ref <mark>lective tape, cor</mark> rect ship's name/home port and lights with non-outdated batteries or smoke signals) available in sufficient amount and in good condition.		~		
"Heavy" lifebuoy (4.5kg) attached to the smoke/lightbuoy at bridge wings in a free fall arrangement.		4		
Lifejackets (including whistles plus lights and non-outdated batteries) found in good condition and sufficient amount as per Certificate. Additional lifejackets available on board.		7		
Line throwing appliances complete with expiration dates of the pyrotechnic units.				
Parachute distress signals available on board in sufficient quantities and in good condition with expiration dates not updated, found on the bridge in an appropriate containment which is marked appropriately.				
Immersion suits (including lights and special attachments)available for all personnel on board and stored in good condition. Additional suits available at				
remote working stations as required				
Emergency illumination at all survival craft stations sufficiently working also illuminating the ship's side and the instructions posted.				



Item	Addressed		
Fire main piping and all hydrants in good condition without signs of corrosion or wastage and without soft patches. Also, couplings and valves free of leakages.	YES	NO	N.A
Fire pumps including prime mover in engine room in good working condition and with sufficient delivery of water pressure			
Emergency fire pump including prime mover in proper working condition with sufficient suction and delivered water pressure. Also, exhaust lines properly insulated.			
Fire stations (including equipment of hoses, nozzles, spanners) in good condition. More specifically, nozzle spray adjustments workable and hoses without deterioration.			
Portable fire extinguishers available on board in good condition as per Fire & Safety Plan (due dates for required servicing recorded and not outdated).			
Fireman's outfit available in required number and good condition (i.e. complete with helmet, clothes, lifeline, lamp and other required requisites).			
Breathing apparatuses in good condition and ready to use with bottles including spare bottles filled.	5		
Fixed fire fighting systems for engine room and cargo spaces in good working condition (e.g. filling status of gas bottles or foam tanks)		0	
CO2 room properly locked and the key readily available.			
Fire detection arrangements properly working at all detection points. Fire extinguishing arrangement in paint locker as required in place and in proper working condition.		\tilde{c}	
Fire dampers and ventilation closing appliances (e.g. gaskets, handles, screws and other) in good working condition. Fire flaps inside trunks checked and closing properly.		~	
Fire doors closing properly using their automatic closing devices and not fitted with hold-backs.	/	7/	
Quick closing devices for tank shut-off and emergency stop of pumps and fans in good working condition.	_ ^>		
Emergency Escape Breathing Devices (EEBDs) available in required amount (plus additional training units) and distributed as per fire plan within superstructure and engine room and under full pressure.			
International shore connection including reduces piece with appropriate bolds and nuts available as per Fire & Safety plan.			



NAVIGATION				
Item	A	Addressed		
Nautical publications including pilot books, list of lights, sailing directions, tide tables, code of signals, IAMSAR books used for the next voyage updated to the latest available amendments/corrections.	YES	NO	N.A	
Nautical charts to be used for the next intended voyage updated to the latest available Notice to Mariners (if applicable ECDIS system updated to latest amendments).				
System for correcting all nautical publications on board has been developed.				
Passage plan from berth to berth available on board .				
Navigational instruments (e.g. radar, echo sounder etc) in proper condition.		- 1117		
Steering gear including rudder angle indicator as well as emergency steering gear including switch-over devices in good operating condition and the steering gear alarm functioning. Also, instructions for switch-over handling posted in vicinity.				
Daylight shapes in operational condition.				
Daylight signalling lamp and the independent power supply in good operational condition.				
Automatic position indicator (e.g. GPS) available on board and in good condition.				
Communication systems between bridge - engine room and bridge- steering gear room is provided and working properly.	1	4		
NAVTEX receiver in good working condition and spare paper is available.				
Echo sounder in good working condition.				
Magnetic steering compass in good working condition and properly visible from steering position. Spare magnetic compass (if provided) in good working condition. Lastly, updated calibration table available.		<		
VDR (or S-VDR) installed correctly onboard and connected to respective devices.				
AIS system installed and constantly switched on.	1	- /		
LRITS in good working condition and test documentation onboard as required.		777		
Navigational equipment verified is as required in the Safety Record "Form E".				



RADIO EQUIPMENT				
Item	Item Addressed			
GMDSS transmitting and receiving equipment components including sources	YES	NO	N.A	
of energy in proper working condition.				
Radio operator assigned onboard is familiar with cancellation procedures for				
false distress alarms.				
Radio log book is kept as required and includes records of tests.				
Portable VHF hand held radios for survival craft including batteries with spares/				
re-charger are in good working condition.				
Antenna systems without any signs of corrosion or damage .		-1117		
Radar Transponders in satisfying working condition and ready to be used in case				
of emergency. Also, they are serviced in accordance with manufacturer's				
requirements by shore service.				
Freefall boat arrangement (if onboard) is fitted with one Radar transporter within				
the freefall lifeboat .				
EPIRB is correct and float free position. The life date of battery and hydrostatic	_			
release valid.				
EPIRB test certificate readil <mark>y available .</mark>				
Radio publications and manuals updated on board.	1			
Radio License on board valid.				
Reserve sources of energy (batteries) properly maintained and in working				
condition.				



SAFETY			
Item	1	Addressed	
Working language of the ship established and recorded in the logbook.	YES	NO	N.A
Updated fire & safety plans posted in accommodation alleyways clearly readable and			
show a sign of approval. One copy if the plan is stored in marked and weather			
tights container outside the accommodation area.			
SOLAS training manuals available, with specific instructions for the appliances			
installed onboard and written in the working language.			
Instruction manuals for onboard maintenance of life-saving appliances available		=1117	
and understood by all crew members. Regular maintenance has been recorded.			
A plan or program of maintenance is readily available.			
Operating instructions for life saving appliances posted on scene and under			
emergency lighting. Instructions written in a language understood by all crew			
members.			
Table of life saving signals poster on the bridge.			
Drills for fire fighting, abandon ship, rescue boat operation and oil spill fighting			
have been carried out satisfactorily and the dates are recorded in the logbook.			
Muster list is updated and written in the working language of the ship. Substitutes			
for key personnel are included and the muster list is posted on the bridge, in			
engine control room an <mark>d accommodatio</mark> n spaces.			
Paint materials stored inside the designated paint locker only.			
Escape ways accessible, free of obstructions and properly illuminated.			
IMO symbols properly used for marking escape ways and locations of emergency	7	-)	
equipment.			
Pilot ladders and related boarding arrangements clean and in good condition.			
Crew working on the bridge is familiar with the steering gear switch-over	1		
procedures and with the use of emergency steering device.			
Key engine crew is familiar with emergency power arrangements.		- 30-7	
Key persons for fire fighting are familiar with starting emergency fire pump.			
Designated lifeboat/rescue boat crew is familiar with starting the engines.			
Public alarm systems as for general alarm are working properly.			
Engineer's alarm of unmanned machinery system is working properly.			



Item	A	Addressed	
Crew is familiar wit the company's safety and environmental protection policy.	YES	NO	N.A
ISM manual is readily available on board.			
All documentation available onboard is written in a language understood by the crew.			
Senior ship officers can identify the "designated person".			
Procedures and data are available and updated to establish contact with shore management.			
Programs for drills and training have been set-up and recorded.			
Familiarization records of new crew members are available onboard.			
Master can show his overriding authority.			
Non-conformities have been reported to the company and corrective actions have been taken by the company.			
Maintenance routine and records are readily available onboard. A copy of the DOC with the endorsement for the latest office audit is available onboard.			
ISPS			
Arrangements in place for controlling access to the ship for persons/goods boarding in the next port.	1	14	
Personnel responsible for controlling access to the ship is familiar with its duties.		EBN.	
Arrangements are in place to secure and control restricted areas in port, as specified in the SSP.			
All entrances leading to restricted areas of the ship ready to be closed or secured.			
Security Equipment maintained and tested as specified in the SSP.	7	1	
	/ 0		
	A		



MLC, 2006			
Item	A	Addressed	
Procedures have been implemented ensuring that no seafarer below the minimum	YES	NO	N.A
age of 16 years is employed on the ship? (Refer to DMLC Part I for a higher			
minimum age).			
All seafarers employed on board the ship have a valid training and competency			
certificates in accordance with flag State requirements (refer to DMLC Part I).			
Records are kept on board for each seafarer engaged on board the ship that has			
successfully passed training in personal safety.			
Evidence is found on board that in case a private recruitment and placement			
service provider is used for the recruitment of seafarers on board, this is approved			
under the requirements of the Convention.			
In case a young seafarer is employed on board (i.e. less than18 years of age)			
measures are in place that no night work in undertaken (for the definition of night			
refer to DMLC Part I).			
In case a young seafarer is employed on board, measures are implemented that			
no tasks have been assigned likely to jeopardize his safety or health.	1		
The ship is manned at least in accordance to the number and capacity stipulated			
on the Minimum Safe Manning Document.			
The medical certificates of all seafarers onboard have been issued by an approved			
medical practitioner.			
The medical certificates issued for seafarers over 18 years of age have maximum			
validity of two years.			
The medical certificates issued for young seafarers have maximum validity of one			
year.			
Medical certificates have been issued in English language in case the ship is	/ 0	<u> </u>	
engaged in international voyages.			
The medical certificates include information on hearing, sight and color vision.			
The validity of colour vision does not exceed six years (unless otherwise specified			
by the flag State).	5		
The medical certificates include a statement that the seafarer is fit for duties.			
All seafarers on board have signed a Seafarers' Employment Agreement (SEA)			
with the shipowner and an original copy is provided to each seafarer.			
The SEA and CBA is in English language in case the ship is engaged in international			
voyages.			
The SEA signed between the seafarer and the shipowner includes all the			
requirements of Regulation 2.1, Standard A2.1.4 as well as national requirements			
of the flag State.			
The SEA includes a clause for early termination of contract that should not be less			
than seven days.			
The wages of each seafarer engaged on board the ship are paid in accordance			
with the SEA and CBA, as applicable.			
Each seafarer is provided with monthly statement of account that includes the			
monthly wage, additional payments, deductions and applied exchange rates.			
The monthly account does not indicate any unauthorized deductions.			
The seafarer has a right to transfer all or part of his/her wage to an account			
nominated by the seafarer.			



MLC, 2006 - (CONTINUE)			
Item	Addressed		
Charges for the remittance of the wages are reasonable in amount (refer to national requirements).	YES	NO	N.A
A table of shipboard working arrangements for all position on board the ship is posted in accessible place and is also in English language.			
Hours of work and rest are available for each seafarer engaged on board the ship.			
The hours of work and rest are signed by the Master (or a person authorized by the Master) and the seafarer.		- 11 P	
The national requirements for the normal working hours and minimum rest hours (or maximum work hours) are followed (refer to DMLC Part I).			
The muster and drills are carried out at times that minimize the disturbance of rest periods and fatigue.			
Additional hours of rest for call outs during normal rest periods are provided to the seafarers.	5		
Procedures have been impl <mark>emented to allow ho</mark> urs of work that may be required in cases of emergency.		0	
All seafarers engaged on board the ship have minimum annual leave with pay based on 2.5 days per month of employment (national requirements to be taken into consideration).		70	
All seafarers engaged on board the ship are entitled to repatriation after a maximum 12 months period, in case of termination of the agreement for justified reasons or when they cannot carry out their duties on board due to illness, injury etc. (refer to the SEA that should state the provisions for repatriation).		7	
All associated costs for repatriation are covered by the shipowner except in cases of serious default of the employment terms by the seafarer.	/ "	7/	
The Master (or person authorized by him) is carrying out inspections of the ship's accommodation and records are kept on board.	2		
The accommodation spaces are clean and provided with proper lighting and sufficient drainage.			
The mess rooms on board are clean, hygienic and equipped with tables and seats sufficient to accommodate the greatest number of crew.			
Cabins are provided separate for each seafarer and for men and women.			
Cabins are adequate size, properly equipped and facilitate tidiness and ensure reasonable comfort.			
Heating and ventilation, including air conditioning, if fitted, is adequate and in good working condition.			
Sanitary facilities are hygienic and reasonable standard of comfort are met.			
The laundry facilities are adequate based on the number of seafarers employed on board and in good working condition.			
The accommodation area has adequate natural and artificial light.			
Recreational facilities are appropriate and in good condition as required by the flag State.			



MLC, 2006 - (CONTINUE)			
Item	Addressed		
The galley is clean, hygienic and in good condition.	YES	NO	N.A
Spaces used for the storage of food are clean, hygienic and in good condition.			
The ship is provided with sufficient amount of drinking water and food of nutritional			
value, quality and variety for the number of crew members on board.			
Food is provided free of charge on board the ship for all seafarers.			
The seafarer assigned a ship's cook is over 18 years of age, trained, qualified and			
food competent according to the requirements of the flag State.			
For ships with less than 10 seafarers, the seafarers assigned for handling and			
processing food in the galley is adequately trained or instructed in areas including			
food and personal hygienic as well as handling and storage of food onboard.			
All seafarers are provided free of charge with health protection and medical care			
(including essential dental care) relevant to their duties.			
All seafarers engaged on board have the right to visit a qualified medical doctor or			
dentist ashore if this is requested or required.			
The ship's hospital is clean and hygienic and used only for medical reasons (not as	1		
a cabin or storage area).			
Medical publications are available on board as required by the flag State.			
An up-today list of radio contacts where medical advice can be obtained is readily			
available on board (taking into consideration the most frequent ports of call).			
The medical log and visit reports are kept up to date. A standard medical report form is used for both onshore and on board medical personnel as required by the			
flag State and the completed form is kept confidential.			
The social security covers, as a minimum, medical care, sickness and injury			
benefits.			
The applicable Occupational Health and Safety (OHS) policy, procedures and		T	
programmes have been implemented and comply with national and international			
regulations and relevant standards and guidelines.			
The people assigned for implementing the OHS policies and procedures on board			
are clearly documented and familiar with their duties.			
Risk assessments are carried out and measures have been implemented to			
prevent all identified risks that could result in accidents, injuries and diseases.			
Accidents and incidents are investigated and reported to the flag State and			
records are available.			
Safety committee meetings are held regularly, and minutes are available.			
The ship is equipped with sufficient Personal Protective Equipment and all			
seafarers engaged on board are familiar with it.			
Appropriate measures are in place to address OHS risks associated with fatigue,			
drug and alcohol use, smoking, asbestos, high and low temperatures, noise and			
vibration and infections.			
Health and safety inspections and surveillance are carried out regularly and			
documented.			1
OHS risks associated with subcontractors working on board are addressed. All			
subcontractors working on board are subject to documented control procedures as required by the flag State.			



Item	Addressed		
All seafarers engaged on board the ship have access to shorebased welfare facilities.	YES	NO	N.A
A copy of the MLC, 2006 is available on board the ship.			
A complaint procedure is implemented on board that shall neither penalize nor victimize the seafarer.			
All seafarers on board the ship have a copy of the complaint procedure.			
A complaints log in maintained on board.			
The complaints are handled in a timely, fair and effective manner.			
Contact details of the flag State authorities and names of nominated persons to trust on board are mentioned in the procedure.			

Recommendation to Owners / Managers / Operators

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