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Port State Control - Recurring Deficiencies

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

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. The 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. Hook release mechanisms to be well maintained, and reset correctly after tests. Operational Instructions to de displayed inside and outside boat(s).

5.5.2. 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, including release mechanisms.

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.

6.5. The Australian Maritime Safety Agency (AMSA) has issued specific guidance on their interpretation of the installation and testing requirements for oil filtering equipment aboard ships. Please refer to *AMSA Marine Notice 2024/03 - Testing and inspection of oil filtering equipment approved to meet Resolution MEPC.107(49)* and Annex 2 of this Notice

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. This form must be submitted to the BMA for calls to US/Australian ports as per MN093

8. Queries

8.1. Any queries on this Notice may be submitted to tech@bahamasmaritime.com or any BMA office.

Revision History

Version	Description of Revision
1.0	First Issue
1.1	Updated branding
1.2	Periodic update and addition of checklist in Annex
1.3	Periodic update including additional deficient items (addition of 3.2.viii, 3.3, addition of hold back hooks to section 4.5.i, addition of fire pump deficiency to section 4.9, new section 5 (more details regarding LSA deficiencies), section 5 to section 6 (unchanged), addition of some COLREG items to checklist under navigation), amended 7.1, new section 8, minor editorial corrections
1.4	Added reference to Technical Alert 23-02 at para 7.2
1.5	Correction of formatting error
1.6	Periodic update

Annex 1

PRE ARRIVAL CHECKLIST TO PREPARE FOR PSC INSPECTIONS

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

Category	Conditions to Verify	Verified	Comments
Fire Safety	Fire dampers are in proper working condition (seal effectively) , tested and examined. Handles and wire in good condition. Machinery flaps and ventilators close correctly. Skylights close from local and remote positions. Ventilator flame screens are in good condition.	YES☐ NO☐	
	Quick-Closing valves and shutdowns operational, maintained, labelled, capable of closing and being reset For pneumatic (air) quick-closing valves, check pressure gauges and verify that the system is fully charged For wire-type closing valves, wires must have regular inspection/ test records on board For hydraulic valves, records of regular oil checks, and leak testing must be available Remove any locking wires, plugs or ropes which prevent proper operation of the valves	YES☐ NO☐	
	Fire Detection System operational on main and backup power with no faults Detectors are tested regularly Detector heads are not covered Spare heads are available Control panels function correctly The control panel indicates the position of the alarm correctly	YES☐ NO☐	
	Main and Emergency fire pump(s) and fire mains (with no leaks) operational, maintained and meet functional requirements. Pumps are individually tested with two hoses supplying water to the extremities of the vessel and water pressure is checked	YES☐ NO☐	

	GS/ballast pumps should not be used in the two-hose test Fire main relief valves, if fitted are checked Isolating valves in the fire main are tested Pressure gauges function properly Pipework is checked and is in good condition Check remote control operation of the fire pump		
	Fire extinguishers stowed correctly, sufficiently charged, and clearly labelled with service/inspection date	YES☐ NO☐	
	Fixed fire-extinguishing system operational and maintenance for respective system carried out as per company's PMS. Clearly marked, readily accessible control stations Gas release alarm, including time delay for extinguishing medium, is operating satisfactorily Clear instructions for operation are posted and are in a language understood the crew Pipework is in good condition with no damage ore defects Nozzles, hoses and valves (depending on systems) operate correctly (check that nozzles etc are not clogged or blocked by paint or rust)gaug Check the calibration status of the pressure gauge The correct number of spare parts are available	YES☐ NO☐	
	Fire doors are capable of being closed without obstruction. Quick-release fire doors close upon activation of the fire alarm and are free from non-approved tiebacks, hooks, and wedges. Seals in good condition.	YES☐ NO☐	
	Fire hoses in acceptable condition to be used, free from leaks and dry rot. Correct diameter and length for stowed location. Hoses to be non-perishable and pressure tested frequently.	YES☐ NO☐	
	Fire mains and hydrants throughout ship in good condition, valves and drains able to operate freely. No pinholes or excessive corrosion prevalent.	YES☐ NO☐	

	Fire Control Plans updated and stowed in appropriate location.	YES☐ NO☐	
	Defects as it relates to Fire safety of the ship have been identified and reported as per company's SMS.	YES☒ NO☐	
	Penetrations through bulkheads, overheads and decks properly sealed and insulated.	YES☐ NO☐	
	Audible and visual indications function correctly	YES☐ NO☐	
	Personal Equipment SCABA and EEBD are readily available and fully charged. Outfits readily available (clothing, boots, helmet, axe and lifeline- do defects) Check the correct number of air cylinders with spares. Check audible and visible alarms for low volume. Check pressure gauge indicating normal pressure	YES☐ NO☐	
	Jacked piping system for high-pressure fuel lines An approved system is in place A leak-tank is in place The tank alarm system is in working order	YES☐ NO☐	
	Fire prevention Hot surfaces are adequately insulated and protected All lamps and fittings are in good condition No naked lights Insulation is in good condition and not wet through with oil Self-closing cocks on sounding pipes and level gauges on oil tanks must not be permanently held open Garbage is segregated in metal receptacles fitted with metal lids	YES☐ NO☐	
	Fire-rated divisions, including main zones Insulation is examined for condition and satisfactory adhesion- no missing damaged or detached portions	YES☐ NO☐	

	All deck and bulkhead penetrations remain tight and are of the appropriate fire rating		
	Sprinkler system Section valves and alarms are tested Pressure gauges function correctly Check the calibration and status of pressure gauges Pipework is checked and in good condition Pumps are tested Two power sources are working correctly	YES☐ NO☐	
	International shore connection Readily available and the location clearly marked Correct number of nuts, bolts and washers	YES☐ NO☐	
	Fire protection- cargo deck area (tankers only) Foam monitors move freely Ventilation is working properly in the foam room Annual test records and foam analysis are available for foam systems Instruction/ guidance is properly posted	YES☐ NO☐	
	Paint locker fire protection system Satisfactory provision is made for extinguishing fire without entering the space	YES☐ NO☐	
	Emergency fire pump Ship's side valves operate freely and are fitted with extended spindles where necessary Diesel-powered pumped are well maintained with fuel and water services, and the exhaust system is in good condition and free from leaks Electrically powered pumps can be run from the emergency supply Relief valves, if required are operational The starting system is functioning and instructions are clearly displayed and understood by the crew	YES☐ NO☐	

	Cargo pump rooms (tankers) Satisfactory provision is made for extinguishing a fire without entering the space	YES☐ NO☐	
ISM	Ships statutory certification is up to date and available.	YES☒ NO☐	
	SMS contains, and the crew fully understands, all policies as it relates to safety and environmental protection.	YES☐ NO☐	
	Contingency and emergency preparedness plans established, practised through drills, recorded and updated appropriately. Photo records with dates are a good idea as evidence of drills being regularly held Crew must be able to demonstrate familiarity with the equipment and be able to carry out their duties quickly and competently	YES☐ NO☐	
	Company's, DPA, and Master's responsibilities are understood and enforced.	YES☐ NO☐	
	Company undertakes review, evaluation and verification of all ISM documentation which is available on, or accessible by their ships.	YES☐ NO☐	
LSA	Lifejackets with lights and whistles are in good condition.	YES☐ NO☐	
	Liferafts have been serviced by an approved service provider, properly secured, required equipment inside launching arrangements satisfactory.	YES☐ NO☐	
	Liferaft HRU's correctly connected with relevant service certificates	YES☐ NO☐	
	Lifebuoys condition satisfactory, legible ship markings visible.	YES☐ NO☐	
	Lifeboat/Rescue boat is in good condition structurally, mechanically and operationally	YES☐ NO☐	
	Lifeboat/Rescue Boat launching appliances and associated systems maintained and operational	YES☐ NO☐	
MARPOL	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. Quantity of oily water retained on board does not match the oil record book entries and or IOPP record of construction and equipment	YES☐ NO☐	

	Discharge violation Oil coating the inside of clean discharge pipes from OWS (note pipes are often removed for inspection) Indications of discharge pipe/valve removal		
	OWS and associated systems functional with a readable OCM display, operational alarm, auto stop , and maintained as per PMS without unauthorized modifications.	YES☐ NO☐	
	Sewage Treatment Plant functional and serviced as per PMS.	YES☐ NO☐	
	Incinerator condition is satisfactory with certification, alarms and associated safety devices functional.	YES☐ NO☐	
	Garbage Garbage bins in accommodation/galley not of approved type (should be non-combustible) Inadequate garbage logbook entries No receipts for garbage landed ashore	YES☐ NO☐	
	Cargo residues Incorrect disposal of cargo residues The disposal was not correctly documented	YES☐ NO☐	
MARPOL Certificates	Shipboard Oil Pollution Plans (SOPEP) “List of National Contact Points” not updated	YES☐ NO☐	
	Oil Pollution Prevention certificate Valid for 5 years and indorsed at annual and intermediate Surveys Includes a record of Construction and Equipment	YES☐ NO☐	
	International Pollution prevention certificate for carriage of Noxious liquid substances in bulk or certificate of fitness for carriage of dangerous chemicals in bulk Includes the cargo list	YES☐ NO☐	
	Engine Air pollution Prevention certificates Includes the Records of Construction and the approved technical files	YES☐ NO☐	

	Statement of Compliance for Condition Assessment Scheme	YES☐ NO☐	
	Anti-fouling Certificates Valid until the anti-fouling system is changed	YES☐ NO☐	
	Energy efficiency certificate	YES☐ NO☐	
	Ballast Water Management Certificate Valid fr 5 years and endorsed at annual and intermediate surveys Ballast water management plan Ballast water record book	YES☐ NO☐	
	Compliance in Inventory of Hazardous materials (EU IHM)	YES☐ NO☐	
STCW	The crew are familiar with the ship, medically fit, and have up-to-date relevant qualifications for their position while being familiar with the company's SMS policy and procedures.	YES☐ NO☐	
MLC	Crew Seafarers Employment Agreement (SEA) seafarers must have original copy CBA (if applicable) must be available on board) English translation of the SEA and CBA must be available on board Notice period of the SEA of not less than seven days The right to terminate contract for compassionate reasons Seafarers shall be given a document containing a record of their employment on board the ship- the document shall not contain any statement of the quality of a seafarer's work or as to their wages SEA's shall continue to have effect while a seafarer is held captive on or off the ship as a result of an act of piracy or armed robbery, regardless of whether the expiry date has passed , medical -in English (2 years-details of hearing sight and colour vision -6 years) and statutory documents for each rank are up to date. Otherwise, circumstances requiring extensions/exemptions have been reported or requested.	YES☐ NO☐	
	Documentation Maritime labour certificate	YES☐ NO☐	

	Valid 5 years subject to intermediate (between 2nd and 3rd anniversary) May be extended 5 months max Declaration of Maritime Labour Compliance 2 parts (1) national compliance (ii) completed by the owner outlines measures the shipowner has put in place to ensure compliance with the flag state requirements Evidence of financial security is Posted in a conspicuous place where it is available to seafarers		
	Rest hours are accurately recorded with explanations for any non-conformities 10 hours in any 24-hour period 77 hours in any seven-day period The daily rest period is divided into two (2) periods, one of which is at least six (6) hours in duration Muster and LSA/FFE drills and other drills are held at times to minimise the disturbance to rest periods and not induce fatigue Compensatory rest for callouts during normal rest periods is considered The table of shipboard working arrangements is posted	YES☐ NO☐	
	Wages have been paid in accordance with SEA and CBA, if any with monthly statement /allotment, no unauthorised deductions, provisions are sufficient, and crew accommodation liveable with necessary comfort and amenities.	YES☐ NO☐	
	Ship is sufficiently manned in terms of numbers and qualifications (in accordance with Minimum Safe Manning Document) with qualified crew members for ship's purpose. Records of training in personal safety are maintained on board	YES☐ NO☐	
	Medical care, on board complaint procedures adequate and available to crew.	YES☐ NO☐	
	Seafarers are entitled to repatriation After a maximum of 12 months period	YES☐ NO☐	

	As stated in SEA In case of termination for justified reasons (by shipowner or seafarer) When they are not able to carry out their duties on board due to illness, injury, etc. Seafarers to serve no longer than 11 months continuously on board a ship (extensions per flag rules) Shore leave granted whenever possible Documentary evidence of financial security for repatriation is available		
	Records of the Master's inspection of the vessel's accommodation are maintained and available Accommodation spaces are clean and in a good state of repair Mess rooms are clean hygienic and comfortable Cabins have hot and cold running water Bedding is clean and hygienic Heating and ventilation, is adequate and well maintained Sanitary facilities are hygienic and work correctly Laundry facilities are in good working order Adequate natural and artificial light is available Noise and vibration experienced within the accommodation are within limits established by the flag state Recreational facilities are appropriate and are in good working order	YES☐ NO☐	
	Galley is clean, hygienic and in good repair Spaces for storage of food are clean, hygienic and in good repair Temperatures of refrigerators and freezers are appropriate Food is free, of good quality and quantity Drinking water is of good quality and quantity	YES☐ NO☐	

	Cook holds appropriate qualifications (trained)		
	Health protection medical care, and essential dental care are available free to all seafarers Medical / dentist visits available without delay Ship's Hospital clean, hygienic Medical equipment/ supplies are provided as per flag requirements Up-to-date list of radio medical contacts where radio medical advice can be obtained is readily available Medical log and visit reports are kept up to date-report forms kept confidential	YES☐ NO☐	
	The people responsible for implanting OHS are designated and documented Risk assessments are carried out and documented Accidents are investigated and reported and records kept Safety committee meetings are held regularly and minutes are available On board training records are available safe working practices are implemented Personal Protective Equipment (PPE) is readily available and used as appropriate for the task. In date, arrangements in place to obtain replacement items when required. Appropriate measure are in place to address OHS risks associated with alcohol use, smoking, asbestos, high and low temperatures, noise and vibration, infections. Health and safety inspections and surveillance are carried out regularly and documented Contractor OHS risks are addressed and subject to documented control procedures Procedures for the elimination of harassment and bullying to be available	YES☐ NO☐	
	Seafarer's complaints Is there a complaints procedure onboard? Does each seafarer have a copy of the procedure	YES☐ NO☐	

	Is there a complaints log onboard? Are complaints handled in a timely, fair and effective manner? Are contact details available for the flag state and seafarer's country of residence		
NAVIGATION	Publications, charts and passage plans updated, logged and readily available to be used or displayed.	YES☐ NO☐	
	All essential navigational equipment in good working order, are serviced accordingly and where applicable, have their certification updated and accessible.	YES☐ NO☐	
	Navigational lights, shapes and sound signalling equipment in good working order	YES☐ NO☐	
SHIP CONDITION	Hull, deck and structural integrity, air pipes and ventilators, accommodation ladders, load line marks are in standard with LLC. Funnel ventilation dampers are easy to operate and seal effectively Weather deck closing appliances for inlets/outlets are easy to operate and seal effectively Wires handles/wheels are in good condition Emergency lights working properly in the vicinity of the damper/ funnel areas	YES☐ NO☐	
	Inert gas system (tankers only) The inert gas generator, scrubber, valves, pipework, blowers, control system, deck seal, alarms and overboard discharge are in good condition and operate correctly A fixed oxygen test meter is calibrated regularly and tests are records Test function of visible and audible alarms Instruction manual to be readily available	YES☐ NO☐	
	Special requirements for ships carrying dangerous goods Equipment as specified in the Document of compliance, such as fire detection, water spray,	YES☐ NO☐	

	ventilation and electrical, as applicable to be checked and is in good condition		
ENGINE ROOM	E/R cleaned bilges free of excess oil , 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. Drip trays and save-alls are empty	YES☐ NO☐	
	Steering gear functioning with no defects, free of excess oil , gyro repeater has no deviation error, and no evidence of hydraulic leaks	YES☐ NO☐	
	The emergency Generator is operational on primary and secondary means of starting including auto-start and capable of carrying rated load. Level in fuel storage tank must be 80% capacity as a minimum Remote fuel shut-offs is clearly marked and the operating mechanism is in good condition Ensure batteries are fully charged for multi-starting Exhaust ventilation is functioning correctly No defects or damages to insulation in the emergency generator space	YES☐ NO☐	
	Emergency batteries Battery levels are correct Appropriate PPE is available is specific gravity needs testing (not sealed type) Ventilation in the battery room is open Explosion-proof lighting provided in the battery room Workshops All cutting and welding gases and equipment are safely and appropriately stored Fire warning signage posted and fire extinguishers are provided in the vicinity of welding areas	YES☐ NO☐	
	E/R electrical panels fault free and insulated matting is in good condition.	YES☐ NO☐	

	All emergency lights and exits operational and clearly marked, free from obstruction.	YES☐ NO☐	
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: _____

Annex 2

This Annex was formerly provided as BMA Technical Alert 24-07 and should be read in conjunction with:

- Regulations 11 & 14 of Annex I of the International Convention for the Prevention of Pollution from Ships, 1973, as amended (MARPOL Annex I)
- International Maritime Organization (IMO) Resolution A.1185(33) *Procedures for Port State Control, 2023*
- IMO Resolution MEPC.107(49) *Revised Guidelines and Specifications for Pollution Prevention Equipment for Machinery Space Bilges of Ships*
- AMSA Marine Notice 2024/03

1. Introduction

1.1. Oil filtering equipment installed on a ship on or after 1 January 2005 shall be approved in accordance with Regulation 14 of MARPOL Annex I using the guidelines in MEPC.107(49).

1.2. AMSA has recently published its "*Marine Notice 2024/03 - Testing and inspection of oil filtering equipment approved to meet Resolution MEPC.107(49)*" which provides their interpretation of the installation and testing requirements for oil filtering equipment aboard ships.

1.3. In accordance with Regulation 11 of MARPOL Annex I Appendix 3 Part 3 item 2.6.5 of Resolution A.1185(33), ort State Control Officers (PSCOs) will inspect the condition and operation of the oily water separator filtering equipment and relevant alarm, stopping device or monitoring arrangements.

1.4. AMSA Marine Notice 2024/03 describes the inspection process that will be used by PSCOs in Australia.

2. AMSA PSC procedure for testing of OWS

2.1. Operational testing of oil filtering equipment will require the equipment to be configured to circulate liquid from bilge tank to bilge tank (recirculating facility) and provide an effluent sample to the 15ppm bilge alarm – simulating the discharge of 15ppm bilge separator effluent overboard. When a simulation of effluent sample greater than 15ppm is applied, the PSCO will confirm that the alarm is activated, and that the automatic stopping device (3-way valve) stops effluent discharge overboard. This indicates compliant operation of the system.

2.2. The PSCO will confirm that there is a flow of effluent sample from the 15ppm bilge separator that is truly representative, with adequate pressure and flow, to the 15ppm bilge alarm while effluent is being simulated to flow overboard.

2.3. In cases where the flow of effluent sample is not a representative sample, including blockage of the sample line or incorrect operation of valves, it is expected that, in accordance with MEPC.107(49) requirements, the fail-safe arrangement will activate the automatic stopping device (3-way valve) and stop effluent discharge overboard.

2.4. AMSA also noted that various classification societies advocate for the installation of "flow sensors" in the 15ppm bilge alarm sample line. The flow sensors activate an alarm and operate the automatic stopping arrangements when a truly representative sample, with adequate pressure and flow, is not present at the 15ppm bilge alarm. It was also noted however that the installation of pressure or flow sensors in the effluent sampling line **is not** specifically required by MEPC107(49).

3. AMSA PSC interpretation

3.1. AMSA's interpretation is that the failure of the 15ppm bilge alarm to activate the automatic stopping device in the absence of a representative sample of the effluent represents non- compliance with Resolution MEPC.107(49), in that there is no fail-safe arrangement required by technical specification 4.1.3.

4. AMSA Considerations during testing of OWS

4.1. The following sets out AMSA's considerations when testing oily water separators during port state control inspection with respect to two types of systems approved under MEPC 107(49):

4.2. ***MEPC 107(49) approved system that is fitted with an effluent sample flow sensor to 15ppm bilge alarm.***

4.2.1. Operational testing of the equipment is performed by stopping the sample water flow to the 15ppm bilge alarm. If the 15ppm bilge alarm does not alarm when effluent sample flow is stopped for more than 5 seconds, and the automatic stopping device is not activated within 20 seconds, this is considered a failure of the oily discharge monitoring and control system and the 15ppm alarm arrangements. The ship is likely to be detained until the system complies with MARPOL requirements.

4.3. ***MEPC 107(49) approved system that <u>is not</u> fitted with an effluent sample flow sensor to the 15ppm bilge alarm.***

4.3.1. The sample water flow through 15ppm bilge alarm should be unobstructed. All valve(s) fitted for sampling line to the 15ppm bilge alarm should be in the normal operating position when testing is performed during port state control inspections. During the test, the following will be considered:

i. If operational testing of the equipment commences with effluent sample valves open, this is evidence of the system being used correctly in service. If there is no 15ppm bilge alarm and automatic stopping device activation after shutting the effluent sample valve, then the equipment is non-compliant. The equipment must be made compliant. As a temporary measure, valves to and from 15ppm bilge alarm can be secured and sealed open to ensure the flow of effluent sample cannot be stopped or manipulated whilst the equipment is operating, as required by MEPC 107(49) 4.2.10.1.

ii. If operational testing of the equipment commences with the effluent sample valve shut or no flow of effluent sample possible through the 15ppm bilge alarm and the automatic stopping device does not activate, this is viewed as evidence that wilful manipulation of the equipment is possible. As pollution of the environment may occur, the ship is likely to be detained until the equipment complies and crew are sufficiently familiar with the operation of the system.

iii. If operational testing of the equipment commences with the effluent sample valve closed and with clean water, used for cleaning or calibration, flowing through the 15ppm bilge alarm and the automatic stopping device does not activate, then the equipment is non-compliant to MEPC 107(49) 4.2.10.2. The ship may be considered for detention until the equipment complies and crew are sufficiently familiar with the operation of the system.

5. Recommendation of the BMA

5.1. It is highly recommended that companies require engineering officers with responsibility for operating the oil-filtering equipment to verify adequate flow and pressure through the effluent sampling line as a part of their regular planned inspections and tests of the oil-filtering equipment.

5.2. If not already fitted, the company should consider the installation of the flow sensor and/or pressure sensor in the effluent sampling line as this would aid officers in verifying that a representative sample is flowing through the line. **<u>It should be noted, however, that the ship's Classification Society should be consulted before making any changes to the approved arrangements</u>**.