



Technical Circular

No.: 010/2022

Date: 21st February 2022

Subject: Marshall Islands Marine Safety Advisory No. 05/2022 Reg. Preparation for United States Coast Guard Port State Control Exams.

1. Republic of Marshall Islands (RMI) Administration has issued Marine Advisory No. 05-22 informing that there has been a significant increase in detentions of RMI flagged vessels during USCG PSC inspections. Most of these detentions were easily preventable by proper and effective implementation of company and vessel Safety Management Systems.
2. In this regard, the Administration vide Marine Notice No. 5-034-5 had introduced the Critical Items Checklist (RMI Form MSD 340) to communicate preventable detainable deficiencies that could be expected in the United States based on historical trends.
3. Prior to arrival in a US port, the Master and Chief Engineer of RMI flagged vessels are required to complete, sign, and submit the Critical Items Checklist to NOA@register-iri.com in conjunction with the eNOA which is submitted 96 hours prior to arrival. Failure to complete the Critical Items Checklist could lead to suspension of the Master's and Chief Engineer's RMI seafarer documents and/or an additional audit of the vessel or Company SMS.
4. In the event of consecutive US port calls, the Critical Items Checklist (MSD 340) need only be submitted prior to the first US port. An updated Critical Items Checklist (MSD 340) must be submitted if the condition of the vessel changes during these consecutive port calls or after the vessel calls a port outside the US.
5. Proper physical verification of the items on the Critical Items Checklist is an effective tool for preventing PSC detentions.
6. However, the recent trends shows that RMI vessels are also being detained for items found in a substandard condition that are not specifically listed in the checklist, implying that the check list alone should never be used as an exhaustive list to identify all possible scenarios.
7. Further, it is noted that tank ships and gas carriers continue to schedule Certificate of Compliance (COC) exams when unprepared, resulting in detentions.
8. In view of above, the Administration has advised that if there are any concerns about the material condition of the vessel, operators must contact the Administration at inspections@register-iri-com to schedule a special inspection prior to scheduling the COC exam.

9. Further the Master and Chief Engineer of RMI flagged vessels have been advised as follows;
 - a. To accurately complete and verify the Critical Items Checklist. Reliance on statements that inspections are complete is not sufficient. **All items must be physically checked and verified.**
 - b. Be proactive and conduct a thorough inspections of their spaces prior to arriving in the U.S. and identify any substandard condition.
 - c. Senior officers and crew members to physically verify compliance and operation of onboard systems. Systems or areas that are most affected include firefighting, life-saving, environmental compliance, load line in terms of watertight integrity of doors and ventilation, and crew familiarity and performance.
 - d. Advise the RMI Administration of any non-operational equipment.
10. Owners/ operators and masters of Marshall Islands flagged vessels are advised to be guided by above. Further, the above requirement be included in the safety management manual and ensure compliance.

Enclosure:

1. Marshall Islands Marine Safety Advisory No. 05-22.
2. RMI Critical Items Checklist (RMI Form MSD 340).

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Republic of the Marshall Islands

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MARINE SAFETY ADVISORY No. 05-22

To: Owners/Operators, Masters, Nautical Inspectors, Recognized Organizations
Subject: PREPARATION FOR UNITED STATES COAST GUARD PORT STATE CONTROL EXAMS
Date: 14 February 2022

This Marine Safety Advisory (MSA) underscores the extreme importance of sufficient preparation for United States (US) Coast Guard (USCG) port State control (PSC) and Certificate of Compliance (COC) exams, as well as completing, verifying, and submitting the *Critical Items Checklist* ([MSD 340](#)) prior to arriving in US waters. It supplements and provides additional guidance for [MSA No. 21-18](#).

USCG PSC Detentions

Recently, there has been a significant increase in detentions of Republic of the Marshall Islands (RMI)-flagged vessels during USCG PSC inspections. Most of these detentions were easily preventable by proper and effective implementation of company and vessel Safety Management Systems. It is imperative that ship managers, superintendents, senior officers, and all crew physically verify compliance and operation of onboard systems. Systems or areas that are most affected include firefighting, life-saving, environmental compliance, load line in terms of watertight integrity of doors and ventilation, and crew familiarity and performance.

Detainable Deficiencies

Below is a summary of recent USCG detention cases that could have been prevented had the *Critical Items Checklist* been utilized:

1. A bulk carrier was detained in Philadelphia, Pennsylvania because 27 out of 32 immersion suits were found with bad zippers. Class surveyors, nautical inspectors, and crew members should examine all exposure suits versus simply spot checking them. Please refer to [MSA No. 09-21](#).



Figure 1: Immersion suit zippers were found defective.

This MSA is evaluated annually by the Administrator and expires one year after its issuance or renewal unless otherwise noted, superseded, or revoked.

2. A bulk carrier was detained in Baltimore, Maryland when fire hoses burst once the fire main was energized. There were also visible cracks near the cargo hatches.



Figures 2 and 3: Burst fire hose (left) and cracked weld (right).

3. An oil chemical tanker was detained in Point Comfort, Texas for multiple International Safety Management (ISM) failures including a substandard cargo system. The vessel was not sufficiently prepared for the COC exam.



Figures 4 and 5: Typical on-deck condition (left) and watertight door (right).

4. A bulk carrier was detained in Richmond, California for the Fixed CO₂ system hoses being disconnected.

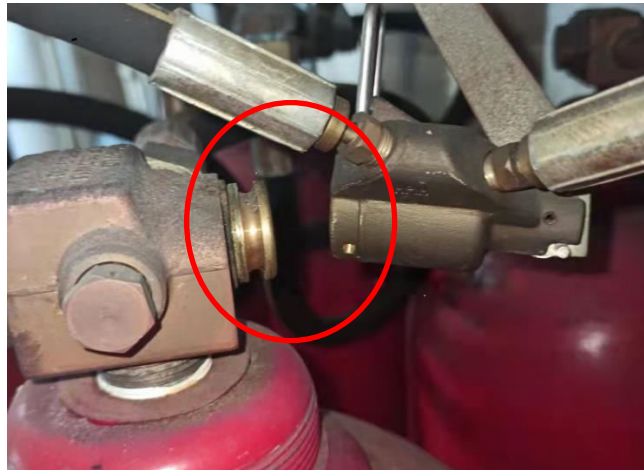


Figure 6: Pilot lines and discharge hoses found disconnected.

5. An oil tanker was detained in Jacksonville, Florida for not being prepared for the COC exam where the 95% high level alarms did not activate on four tanks and the accommodation escape door handles were missing.
6. A self-discharging bulk carrier was detained in Tampa, Florida for inoperative watertight doors.

Importance of the Critical Items Checklist and Management by Walking Around

The intent of the *Critical Items Checklist* is to communicate preventable detainable deficiencies that could be expected in the US based on historical trends. It was never intended to be an exhaustive list for every possible scenario. Completing this checklist is an RMI requirement. Refer to Marine Notice [5-034-5](#), *Measures to Improve Compliance of Republic of the Marshall Islands Flagged Vessels in United States Ports*.

Recent trends show that proper physical verification of the items on the checklist is an effective tool for preventing PSC detentions. However, RMI-flagged vessels are also being detained for singular items found in a substandard condition that are not specifically listed on the checklist. For this reason, it is extremely important for Masters and Chief Engineers to conduct thorough inspections of their spaces prior to arriving in the US and identify any substandard condition. This process is referred to as Management by Walking Around (MBWA), which has been an historically proven and effective strategy in the industry to ensure that senior management are actively looking for any issues that could hurt or impact operations.

Action

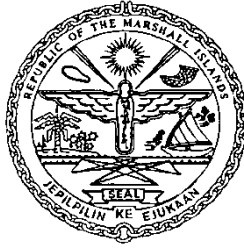
Senior management must be proactive before arriving in the US and physically inspect their spaces and systems for any condition that can be deemed substandard. The *Critical Items Checklist* is a tool for inspecting the vessel but should never be used as an exhaustive list to identify all possible scenarios. Furthermore, tank ships and gas carriers continue to schedule COC exams when unprepared, resulting in detentions. Therefore, if there are any concerns about the material condition of the vessel, operators are encouraged to contact the Maritime Administrator at inspections@register-iri.com to schedule a special inspection prior to scheduling the COC exam

It is understood that senior officers are extremely busy and under a lot of stress. Nevertheless, a 30 to 60-minute walkthrough inspection with a flashlight could prevent hours of lost time and laborious external audits caused by preventable detentions.

Masters and Chief Engineers are reminded to:

1. Accurately complete and verify the *Critical Items Checklist*. Reliance on statements that inspections are complete is not sufficient. All items must be physically checked and verified.
2. Be proactive and embrace the concept of MBWA.
3. Advise the RMI Maritime Administrator (the “Administrator”) of any non-operational equipment.

In fact, any crew member or vessel representative may alert the Administrator of potential substandard conditions onboard at inspections@register-iri.com. All correspondence will be kept strictly confidential.



**REPUBLIC OF THE MARSHALL ISLANDS
MARITIME ADMINISTRATOR
CRITICAL ITEMS CHECKLIST**

For all merchant vessels – the below Checklist is to be completed, signed and submitted to the Republic of the Marshall Islands (RMI) Maritime Administrator (the “Administrator”) prior to arrival at a United States (US) port. Failure to follow these requirements could lead to a detention by the Administrator or PSC authorities. **Place a check mark for either “Yes,” “No,” or “N.A” (not applicable) as shown below.**

VESSEL NAME:	OFFICIAL NO.:
OWNER’S AGENT, PHONE, EMAIL:	

Yes	No	N/A	REQUIREMENTS FOR ALL VESSELS
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All ships equipped with MEPC.107(49) Oil Content Meters (OCM) must ensure that the Engineering Department staff can retrieve the “historical data” upon request by PSC authorities. All engine room alarm history, Oil Record Book (ORB) entries, OCM history and tank soundings must match with respect to dates and tank levels. Any deviation must be investigated, corrected, and if necessary, reported to the Administrator. The use of “white out” is not permitted in ORBs. All OCM seals must be intact and not tampered. All ships must demonstrate that the Oily Water Separator (OWS), OCM, and 3-way valve are fully operational, and crew is able to test in accordance with written test
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Ensure OWS piping systems are in accordance with ship’s approved drawings.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No fuel oil, lube oil or hydraulic leaks on operating machinery and no oil-soaked lagging.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No soft patches on piping systems. If found, contact the Administrator immediately.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No excessive bilge water in the engine room (or any other fire hazards in all machinery spaces).
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bilge high level alarm system demonstrated fully operational.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The fire detection system demonstrated fully operational with no faults. Vessel must have onboard a means to test smoke, heat, and flame detectors which is approved by the manufacturer. No temporary covers or obstructions on any smoke or heat detectors for any reason. If applicable, cargo hold fixed smoke detection and/or extraction system is connected and fully operational.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All quick closing fuel valves are working properly without binding. No temporary blocks to force valves in the open position. All pneumatic lines connected.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Steering gear tested in all modes including local and emergency without binding or uncontrolled hydraulic oil leaks. All steering alarms are fully operational.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Main fire pumps – US Coast Guard (USCG) PSC will likely require one (1) fire hose rigged forward and one (1) from the bridge wing - and demonstrate two (2) straight steady streams of water with adequate pressure at the local gauge. Consideration must be given for extremely cold weather during the winter months.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Emergency fire pump must be fully operational under any ballast or loaded condition and provide two (2) straight steady streams of water as described above.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No leaks or temporary patches in the fire line or significant uncontrolled leaks in the packing glands or mechanical seals when fire pumps are energized.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Emergency generator is tested in all starting modes and can accept the electrical load. Starting batteries fully charged and in good condition.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Machinery space ventilation dampers tested to ensure that they close tightly and there is no mechanical binding
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Stack dampers tested to ensure that they close tightly and there is no mechanical binding or light leakage observed from inside the stack space.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No cement boxes unless the vessel’s Classification Society (Class) has fully documented it.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No overdue Conditions of Class.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All lifeboat and rescue boat engines must start immediately, and the rudders have good freedom of movement and no binding. Consideration must be given for extremely cold weather during the winter months.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All lifeboat windows must have good visibility and not partially obscured, hazed or opaque. No cracks or fractures.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No cracks or fractures in the lifeboat hulls or temporary repairs of any kind.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All lifeboat food rations are in 100% airtight packing and not expired.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All life raft painters must be secured properly to ensure "free floating" capability. This must be checked even after servicing.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Life rafts and critical firefighting equipment being serviced in port or at anchor must have temporary equipment placed onboard by the service provider while the equipment is being sent ashore.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All immersion suits visually inspected both internally and externally for tears, cracks, and deterioration. Zippers fully operational, not deteriorated, and open and close without binding.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All firefighting suits must be in satisfactory condition, with the face mask in good order. No dry rotted rubber mask straps. Jackets, pants and gloves must not have any holes or rips in the material. Aluminized coating intact and in good condition.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All fire screen doors must immediately slam fully shut when closed with no hold backs keeping doors in the open position.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No missing, paint covered, or plugged fixed CO ₂ / foam / or water mist system nozzles.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All life boats and rescue boats must be able to be launched and retrieved.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Nautical Charts, including ECDIS, must be updated to the most current Notice to Mariners. Publications must be up to date, and voyage plan must be properly prepared.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vessels equipped with water mist systems should verify that all valves are in the correct alignment (OPEN) and to ensure that the system is FULLY operational. Also, the system must be in "AUTOMATIC MODE" and not "MANUAL MODE" and system is "on."
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Master, officers and crew ready for fire, abandon ship and confined space rescue drills as directed by USCG PSC
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All officers and ratings required by the vessel's Minimum Safe Manning Certificate have the appropriate and unexpired national and flag State documents for their capacities.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	In accordance with MN-2-011-13 §1.2, Cyber risks have been identified and addressed in the vessel's SMS.
			Please note the date of the ISM Document of Compliance annual verification:

Yes	No	N/A	ADDITIONAL REQUIREMENTS (for tankers only)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Inert Gas Generator and/or Inert Gas System is fully operational.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Overboard Discharge Monitoring Equipment (ODME) is fully operational.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The cargo tank high level alarm and high-high level alarm to be operating with audio-visual alarms as required.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Fixed gas detection system is fully operational.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All pressure/vacuum (P/V) relief valves for cargo tanks have been tested and are operational.
List of any non-operational equipment:			

FAILURE TO FOLLOW THIS CHECKLIST COULD LEAD TO THE VESSEL BEING DETAINED

By signing below, I certify that I have reviewed and verified each item found on the Critical Items Checklist. I also certify that if there is a problem with any item on the Checklist or any other non-operational equipment, I will notify the Administrator immediately at NOA@register-iri.com and I will report any non-operational equipment on the vessel's NOA. I understand that adverse actions can be taken against my Officer's license by the Administrator for failure to report a problem.

<i>Master Signature / RMI Certificate No.</i>	<i>Print Name</i>	<i>Date</i>
<i>Chief Engineer Signature / RMI Certificate No.</i>	<i>Print Name</i>	<i>Date</i>

COMPLETED FORM IS TO BE EMAILED TO NOA@register-iri.com