

MARITIME BUREAU OF AFRICA

MARINE CIRCULAR 19-019 - 14 April 2019

To: ALL SHIPOWNERS, MANAGERS, MASTERS, AND REGISTRATION OFFICERS OF MERCHANT SHIPS AND MBA SURVEYORS.

Subject: DEFICIENCY PREVENTION SYSTEM BY PALAU INTERNATIONAL SHIP REGISTRY

1. Introduction

1.1 In 2017, **Palau International Ship Registry (PISR)** introduced the **Deficiency Prevention System (DPS)** to aid and support to prevent deficiencies on vessels while inspected by PSC Authorities, mainly Paris and Tokyo MOU. DPS is part of PISR Quality System as Certified by its ISO 9001:2015 standards and PISR Anti-Bribery Management System as certified by its ISO 37001:2016 standards.

1.2 DPS is a unique, solely designed and developed system by PISR, raises awareness of the importance of the prevention of deficiencies and contributes to the safety of life at sea and the prevention of marine pollution.

1.3 DPS is fully administrated by PISR with main objective to introduce a more preventive and risk-based approach to targeted ships for inspection and to enhance quality status on PISR vessels.

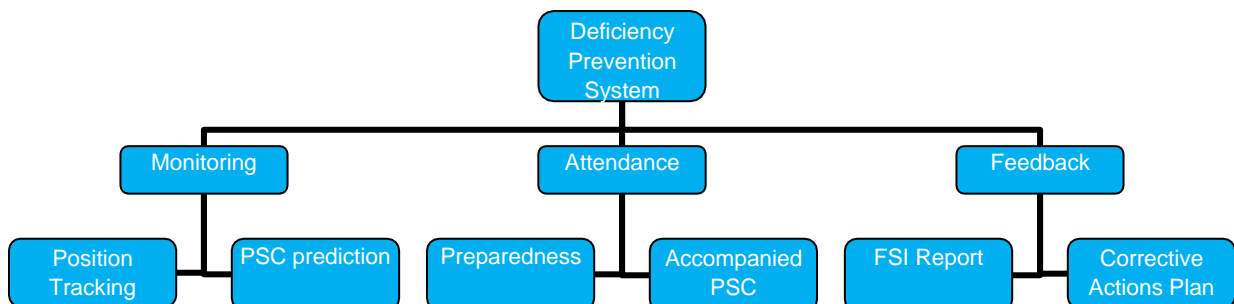
1.4 The system can assist a vessel and subsequently the management company to upgrade PSC inspection performance and therefore, to increase their profitability by getting higher fares.

2. References

2.1 Paris MOU (<https://www.parismou.org/>)

2.2 Tokyo MOU (<http://www.tokyo-mou.org/>)

3. DPS Pillars



4. Procedure

The DPS is a process which consists from 7 major steps, administrated internally by PISR HQ:

4.1 Ship Tracking and Screening

If the vessel's next port of call is within Paris or Tokyo MOU, then the vessel's risk indicator is estimated.

4.2 Identification of MOU Priority:

Initially, the risk profile of the vessel is identified as either High Risk Vessel (HRV), Standard Risk Vessel (SRV) or Low Risk Vessel (LRV).

Based on a ship's Risk Profile, the Inspection and Selection Scheme determinates the priority of the scheme.

a. **Periodic Inspections** are carried out at intervals determined by the ship risk profile.

The selection scheme is divided into two priorities:

- **Priority I:** ships **must be** inspected because the time window has closed.

- **Priority II:** ships **may be** inspected because they are within the time window.

- **No Priority**

b. Additional Inspections according to Paris MOU procedures. are carried out when overriding or unexpected factors might trigger an inspection in between periodic inspection.

i. **Overriding Factors**

The overriding factors listed below are considered sufficiently serious to trigger an additional inspection at Priority I:

- Ships reported by another Member State excluding unexpected factors,

- Ships involved in a collision, grounding or stranding on their way to port,

- Ships accused of an alleged violation of the provisions on discharge of harmful substances or effluents,

- Ships which have been maneuvered in an erratic or unsafe manner whereby routing measures, adopted by the IMO, or safe navigational practices and procedures have not been followed,

- Ships which have been suspended or withdrawn from their Class for safety reasons after last PSC inspection,
- Ships which cannot be identified in the database.

ii. **Unexpected Factors**

Unexpected factors could indicate a serious threat to the safety of the ship and the crew or to the environment but the need to undertake an additional inspection is for the professional judgement of the Authority.

- Ships reported by pilots or relevant authorities which may include information from Vessel Traffic Services about ships' navigation,
- Ships which did not comply with the reporting obligations,
- Ships reported with outstanding deficiencies (except those with code 16 (within fourteen days) and code 17 (before departure)
- Previously detained ships (3 months after the detention),
- Ships reported by the master, crew member or any person or organization with a legitimate interest in the safe operation of the ship, shipboard living and working conditions or the prevention of pollution,
- Ships operated in a manner to pose a danger,
- Ships reported with problems concerning their cargo, in particular noxious or dangerous cargo,
- Ships where information from a reliable source became known, that their risk parameters differ from the recorded ones and the risk level is thereby increased,
- Ships carrying certificates issued by a formerly Paris MoU recognized organization whose recognition has been withdrawn since the last inspection in the Paris MoU region.

c. **Under-Performing Ships** as per Tokyo MOU procedures are eligible for PSC inspection at every Tokyo MOU port.

After the analysis of the above Selection Criteria, PISR estimate with over 93% confidence level if the subject vessel shall be attended by PSC Authorities. PISR will also take into consideration internal historical data collected by previous FSI, PSC or RO inspections.

4.3 Confirm Ship's Destination and ETA

The monitoring and screening occur without disturbing the ship owner, manager or Deputy Registrar until the point that PISR contacts them and informs about a high-risk indication for inspection and imposed deficiencies. Afterward, the ship owner/manager shall confirm the destination port/ETA/ETB, advise estimated duration of staying on board and provide the local agent's contact details.

4.4 Identify Inspector's Availability and Cost

At this point PISR confirms the availability of a **Flag State Inspector (FSI)** which currently has a [network](#) of 103 inspectors in 45 countries to attend the subject ship and identifies the cost of travelling. The selection of the surveyor is always in accordance with the:

- Qualifications and Experience of the FSI
- Location
- Cost Effectiveness

4.5 Survey Management

After contacting and receiving confirmation from owners, PISR provides detailed instructions that the FSI should follow during the attendance. The main actions that should be taken are appeared as below:

- I. Keep in contact with local agent and arrange to be on board upon arrival or at the morning after berthing.
- II. Carry out a Preparedness Survey for the vessel to be prepared for PSC Inspection. Any deficiencies observed, should be recorded in the FSI report for the acknowledgement of PSC inspectors and PISR, and should be rectified with a precise Corrective Actions Plan (CAP). The reported deficiencies should be presented to the PSC and shall not be included in the PSC report.
- III. In case that the vessel is not found ready for PSC, the FSI shall coordinate with the agent to request a postponement of PSC attendance on a later stage.
- IV. Remain on board during PSC inspection in order to observe the progress of the latter and intervene if required.
- V. If the PSC officer identifies any deficiency - other than the ones enclosed in the FSI report - that may lead to the vessel's detention, the attending FSI should notify the PISR Head Office in order to provide further instructions to the inspector and take necessary actions in order to avoid any possible detention.
- VI. Provide the Preparedness Report duly signed and stamped by both the FSI and the master.

4.5.1 Duration of Surveys

Estimated duration of the surveys (Depending on the available information regarding PSC attendance and the vessel's readiness for PSC) shall be two days, one day for PSC preparations + one day for accompanying the PSC.

4.5.2 Harmonization

The Preparedness Survey may be harmonized with other Flag State Inspections for which the vessel may be eligible in order to achieve minimum disturbance of the ship's operations. Such kind of inspections are:

- Flag Annual Safety Inspection or Ad/hoc Flag State Inspection
- ISM/SMC/MLC Additional Audit

4.5.3 Documentation for the FSI

PISR HQ is going to review the previous FSI, PSC and RO reports and the vessel's survey status in order to identify any due surveys or open deficiencies. Then, the FSI will be provided with previous deficiencies imposed by either the Flag State, the RO or the PSC to identify their rectification.

4.6 Survey Applicability & Cost

Ship Status*	PISR Attendance	Survey Fees		Travel Expenses
		PISR	Owner	
PRIORITY 1 (or overriding factors)	Mandatory	PISR	Owner	Owner
		100%	0%	
PRIORITY 2 (or unexpected factors)	Mandatory	PISR	Owner	Owner
		50%	50%	
No Priority	Optional (at owner's request)	PISR	Owner	Owner
		0%	100%	
Under-Performing Ship (TMOU)	Mandatory**	PISR	Owner	Owner
		0%	100%	

** As identified by PISR according to the factors presented in section 2. The status may be altered based of information received*

*** On an under-performing ship, the attendance of PISR is mandatory at any Tokyo MOU port and until the vessel passes a PSC inspection and all the fees will be covered by the owner irrespective of the ship's PRIORITY.*

4.6.1 Distant Audit

In circumstances where the vessel, as PRIORITY for PSC, is calling a port but will not be attended by an FSI to assist with possible PSC attendance, PISR will carry out a free-of-charge Distant Audit on the vessel in order to provide proper guidance to the master for undergoing PSC preparations. A Distant Audit Checklist shall be completed by the master and provided back to PISR duly signed and sealed. In such case, the responsibility remains with the ship managers and the master of the vessel to carry out a detailed inspection prior ship's arrival as per the checklist and assure that all items are satisfactory. If any deficiencies found, PISR needs to be contacted for support in order to provide further instructions.

4.6.2 Refusal of DPS

In cases where the attendance of FSI is deemed mandatory (as per the table "Survey Applicability & Cost") by PISR, but the owner refuses to accept attendance, then, if the ship gets detained, PISR holds the right to impose Penalty Fee up to \$10,000.00 to the owner and/or suspend the registration of the detained vessel.

4.7 Reporting & Corrective Actions

Upon completion of the survey, the FSI shall provide a Preparedness Report duly signed and stamped by both the FSI and the master. The Preparedness report shall indicate the found deficiencies and their rectification period. Moreover, the management company shall provide the Corrective Actions Plan report (CAP) to PISR. The CAP should identify the rectification of any open deficiencies reported by the PSC, FSI or the RO and should be provided within the imposed rectification period. Moreover, the CAP should be accompanied with relevant photos or other evidence.

4.8 Data Recording

Upon completion of the procedure, PISR dedicated DPS Department is going to update the vessel's records accordingly in order to continue the monitoring.

Moreover, a Preparedness report will be delivered on the vessel. The report will consist of the inspector's remarks and further advice for the crew and the management in order to enhance the vessel's operation and improve the vessel's condition to the highest level.

PISR Administration continuously analyses the statistical indicators of PSC per country and ports. Based on the findings, PISR identifies any changes to the Ship Risk Profile.

5. Benefits

Offering DPS for free in most cases, or at minimum cost, we expect in return from the shipowner communication, cooperation and partnership! The relationship between the owner and the Administration is the basic one. Therefore, the importance of choosing a partner is huge and much care is needed in order to find partners with similar views, to share common goals and principles. Partners willing to cooperate and steer the way ahead. In an ideal world, this relationship with the ship owners evolves into a true partnership, where each party has a commitment to look over the safety and the security of the ships, the crew welfare and the protection of the environment.

- 5.1 We are there to look at the ship, through physical attendance, not just chasing paper correctness. DPS focuses on the deficiency prevention not just the detention and it is a tremendous adding value service and differentiates PISR from any other Registry in the world.
- 5.2 The system can assist a vessel and subsequently the management company to upgrade their performance to Paris and Tokyo MOU and therefore, to increase their profitability by getting higher fares, by getting less deficiencies during PSC.