

Tokyo MOU



Case Study for Detention

KR Survey Team

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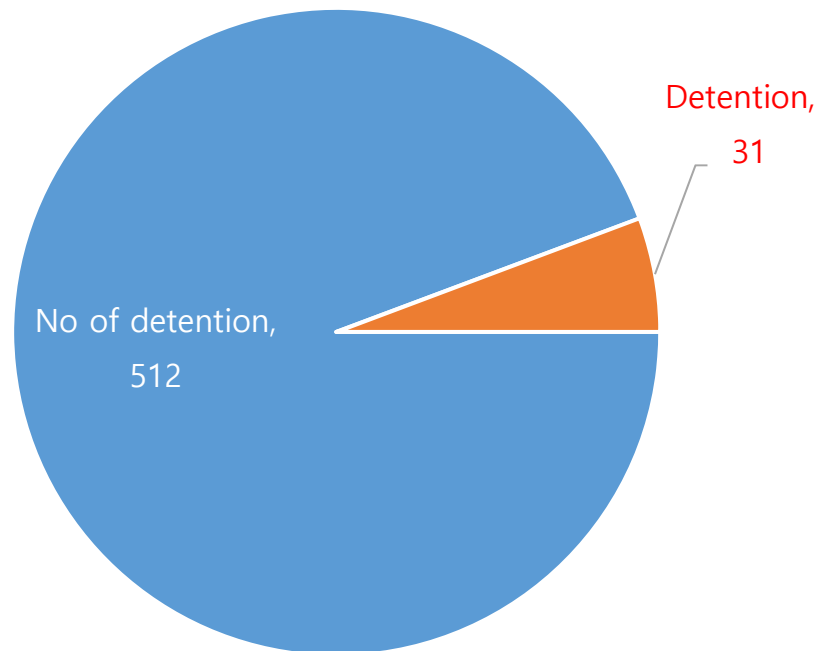
Countermeasures

Overall countermeasures for PSC detention



Detention by USCG for ships registered in KR (2018.01 ~ 2018.06)

Percentage of ships detained by Tokyo MOU



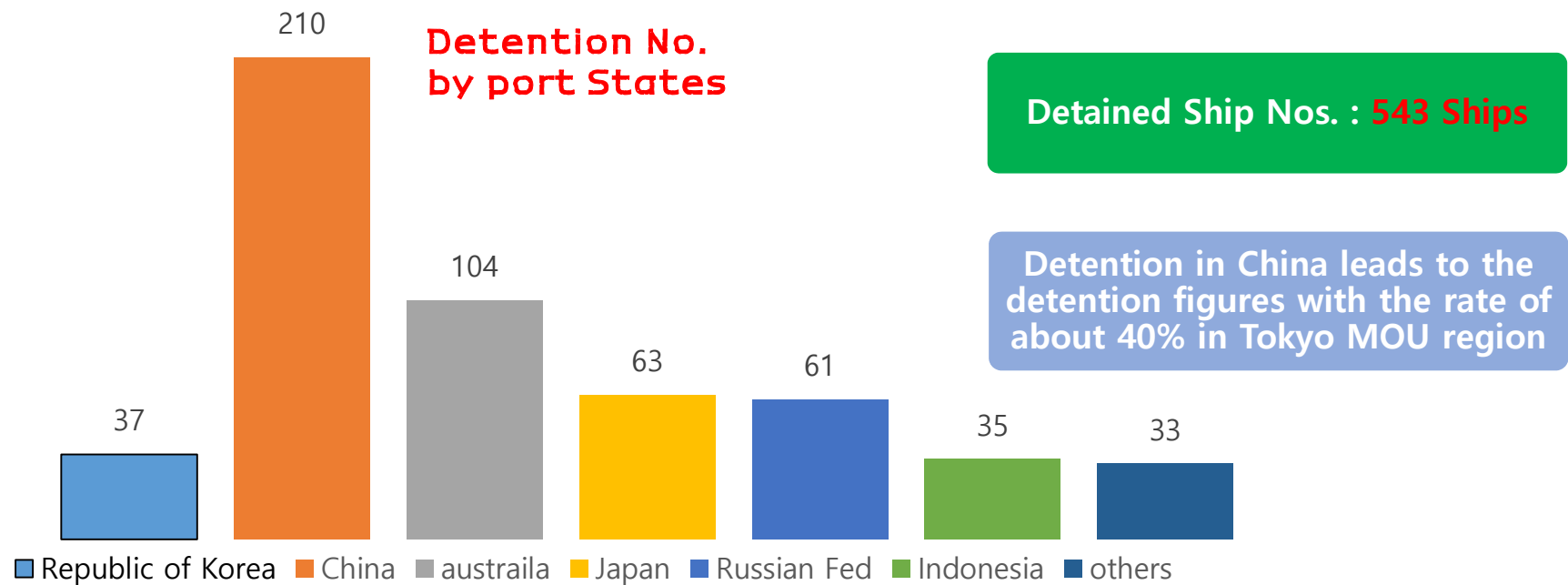
Detention : 31 ships registered in KR

Category

- Fire Safety & Life Saving
- Safety of Navigation
- Pollution Prevention
- ISM and others

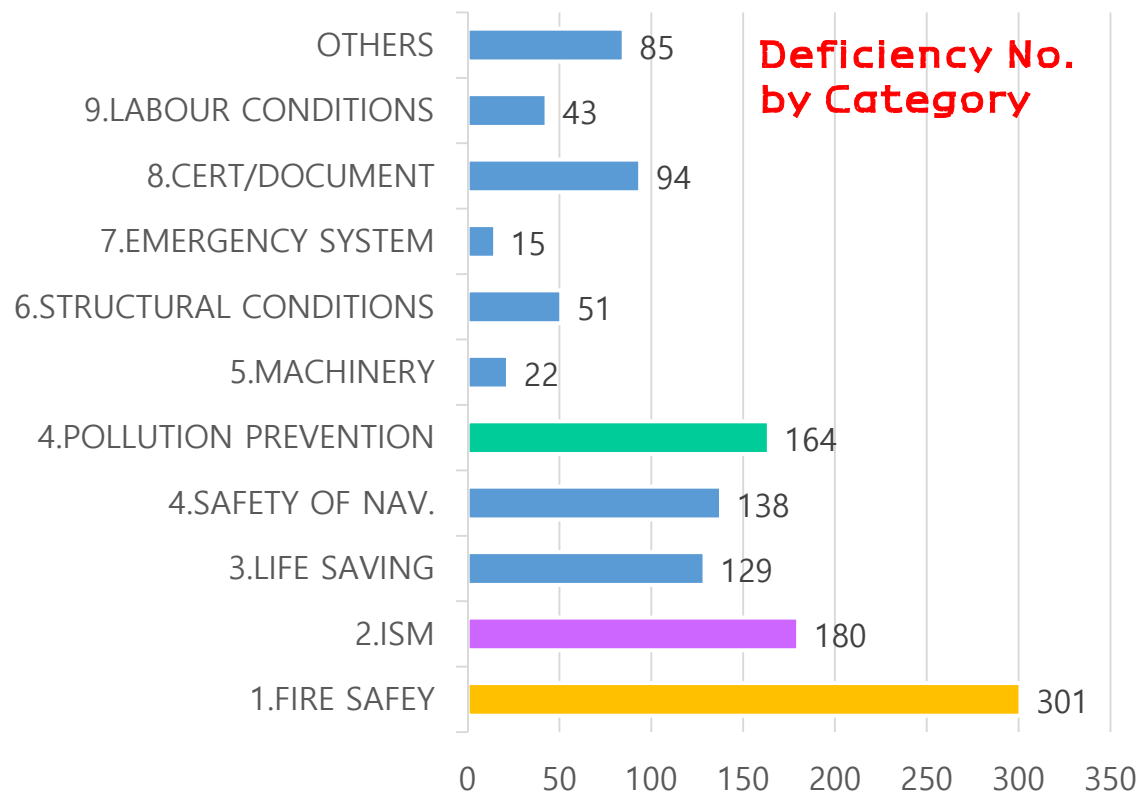
Part. I Statistics of Tokyo MOU Detention

Detention by Tokyo MOU, including ships registered in other Classes (2018.01 ~ 2018.06)



Part. I Statistics of Tokyo MOU Detention

Detention by Tokyo MOU , including ships registered in other Classes (2018.01 ~ 2018.06)



Detained Ship Nos. : **543 Ships**

Deficiency No. of detained ships :
Abt. 1222 deficiencies

1. FIRE SAFETY 2. ISM 3. POLLUTION PREVENTION

The most top three detainable deficiencies in the region with 645 deficiencies (Abt. 52%)

Part. I Statistics of Tokyo MOU Detention

Detention by Tokyo MOU, including ships registered in other Classes (2018.01 ~ 2018.06)

Category	Details for Deficiency
Fire Safety	<ol style="list-style-type: none">1) Defective on fire doors/openings in fire-resisting divisions2) Defective on fire prevention structural integrity3) Defective on fire detection system for engine room4) Defective on fire dampers5) Defective on inert gas system
ISM	<ol style="list-style-type: none">1) Lack of maintenance of the ship and equipment2) Lack of master's and/or officer's responsibility3) Lack of familiarity with on board training and instructions4) No familiarity on shipboard operations
Life Saving	<ol style="list-style-type: none">1) Defective on life boat & rescue boat engine2) Defective on embarkation arrangement survival craft3) Defective on launching arrangements for rescue boats
Cargo Safety	<ol style="list-style-type: none">1) Nautical publications outdated2) Defective on voyage data recorder3) Defective on Bridge Navigation Watch Alarm System(BNWAS)

Part. I Statistics of Tokyo MOU Detention

Detention by Tokyo MOU, including ships registered in other Classes (2018.01 ~ 2018.06)

Category	Details for Deficiency
POLLUTION PREVENTION	<ol style="list-style-type: none">1) Defective on sewage treatment plant2) Defective on oil filtering equipment3) Defective on 15 PPM alarm arrangements
Machinery	<ol style="list-style-type: none">1) Defective on propulsion main engine2) Defective on auxiliary engine
Emergency System	<ol style="list-style-type: none">1) Defective on emergency fire pump and its pipes2) Emergency source of power unavailable
Cert/Document	<ol style="list-style-type: none">1) CREW CERTIFICATES - Certificates for master and officers2) Minimum safe manning certificate3) Procedure for complaint under MLC,2006
Others	<ol style="list-style-type: none">1) Fitness for duty - work and rest hours2) Condition of employment - Wages



Case 1. Oily water separator 15ppm alarm



Overview

The vessel was detained due to the detainable deficiency - "Oily water separator 15ppm alarm found not working".

The failure of 15 ppm alarm is considered as a serious deficiency as the alarm is a critical equipment to control the discharge of oil mixture from the vessel, as such the vessel should be detained until the deficiency is rectified.



Cause & Action

The malfunction of the 15ppm alarm was because of a failure of a printed circuit board(PCB) of the 15ppm monitoring device.

After detecting the alarm failure, the Engineer on board was allowed sufficient time to rectify the problem before the PSCO disembarked the vessel, but was not successful. Besides, the engineer did not show to the PSCO any maintenance record of the equipment.



Measures

A failure of the 15ppm alarm is a serious deficiency related to the protection of the environment.

The 15 ppm-monitoring device should be tested regularly without objections before the detention of the ship.

Should this deficiency be considered as an accidental damage, the port State Authority should be informed and corrective action should be initiated prior to the start of the inspection.

Case 2. Operation of GMDSS



Overview

The initial action by the second officer in response to the PSCO's request for a GMDSS DSC test call was wrong (i.e.: making a voice call rather than a DSC test).

The second officer also failed to provide the reply/acknowledgement from the relevant coast station for the DSC tests during the inspection.



Cause & Action

The second officer was not familiar with the operation of the GMDSS radio and unable to demonstrate operation of a DSC test call.

This was attributed to the lack of operational knowledge of the second officer by the PSCO.



Measures

The vessel did have sufficient number of personnel who could operate the GMDSS equipment correctly as evidenced by the records and logs on board, but at the time of testing, the non-acknowledgement of test calls may give the impression that the equipment is not operational or the second officer is not proficient .

Case 3. Fire dampers of E/R



Overview

The vessel was detained due to two fire dampers of E/R can not close (only closed to 50%) in accordance with the SOLAS 81 Amendments II-2 Reg.2.7, where "any fire-extinguishing appliances should be readily available"



Cause & Action

Although crew took immediate action to settle the deficiency within short time, "TWO FIRE DMAPERS OF E/R CAN NOT CLOSE." is serious enough(only closed to 50%) leading to the ship detained according to the relevant mandatory requirements of the SOLAS 81 Amendments II-2 Reg.2.7, any fire-extinguishing appliances should be readily available.



Measures

Lack of periodical test and inspection by the crew lead to the detention , because if records show that tests and inspections of these fire dampers were supposedly carried out regularly and effectively, such a deficiency should not have happened;

Case 4. Records of Rest Hours



Overview

Based on the facts that the IMO recommended model format for records of hours of work or rest is not used onboard, that records of rest are only for 9 out of 13 crew onboard and that all crew's rest records are recorded the same (i.e. 8 hours work and 16 hours rest everybody everyday in the same pattern), obviously actual working hours are not correctly reflected (e.g. drill, maneuvering, bunking)



Cause & Action

The three examples presented in the evidence pack provided by the port State and interview with crews potentially indicate that the Hours of Work and rest were recorded in the same pen script, by a single person, on a single occasion, as such it is concluded that all records were false

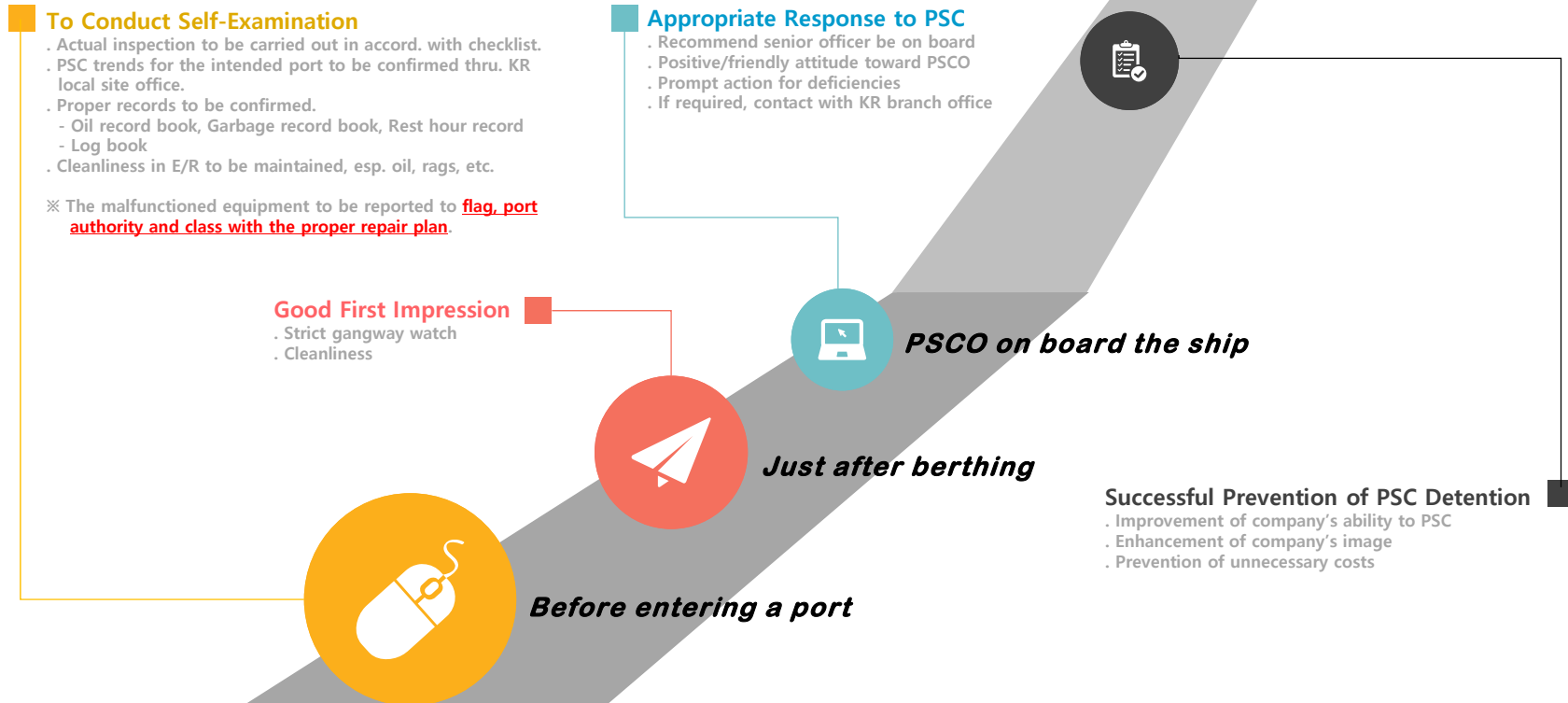


Measures

In the absence of any further evidence indicating that the crew are well rested, the attending PSCO would be the best judge as to the immediacy of any threats to the ship, crew, and environment from fatigue.



1 | PSC Countermeasures



2 How to deal with PSC matters and approach to them ?

