REPUBLIC OF THE MARSHALL ISLANDS

MARITIME ADMINISTRATOR

MARINE SAFETY

GUIDELINES FOR NAUTICAL INSPECTORS



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NOTICE

THIS DOCUMENT IS INTENDED AS A GUIDE FOR NAUTICAL INSPECTORS AS TO PRACTICES ESTABLISHED IN THE OFFICE OF THE MARITIME ADMINISTRATOR. IT IS NOT INTENDED TO DEROGATE FROM OR SUBSTITUTE FOR ANY REQUIREMENTS OF THE REPUBLIC OF THE MARSHALL ISLANDS MARITIME ACT, AS AMENDED, OR THE REPUBLIC OF THE MARSHALL ISLANDS MARITIME REGULATIONS.

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TABLE OF CONTENTS

| 1.0 | INTRODUCTION | | | | |
|-----|--------------|---|----|--|--|
| | 1.1 | OBJECTIVES | 1 | | |
| | 1.1 | DEFINITIONS | | | |
| | 1.3 | ORGANIZATION | | | |
| | 1.4 | RESPONSIBILITIES | | | |
| | 1.5 | | | | |
| | 1.5 | AUTHORITY | | | |
| | 1.7 | IDENTIFICATION CARDS | | | |
| | 1.7 | | | | |
| | 1.0 | CONTRACTS | | | |
| 2.0 | INSP | PECTIONS | 9 | | |
| | 2.1 | GOALS | 9 | | |
| | 2.2 | TYPES OF INSPECTIONS AND/OR AUDITS | | | |
| | 2.3 | SCHEDULING | | | |
| | 2.4 | | | | |
| | 2.5 | PROCESS | | | |
| | 2.6 | CONDUCT | | | |
| | 2.7 | INSPECTION DETAILS AND FORMS | | | |
| | | 2.7.1 PRE-REGISTRATION INSPECTION (Pre-Reg) | | | |
| | | 2.7.2 INITIAL SAFETY INSPECTION (ISI) | 14 | | |
| | | 2.7.3 ANNUAL SAFETY INSPECTION (ASI) | | | |
| | | 2.7.4 SPECIAL INSPECTION (SI) | | | |
| | | 2.7.5 SPECIAL INSPECTION – QUALITY CONTROL BOAF | | | |
| | | QCB) | | | |
| | | 2.7.6 PASSENGER VESSEL INSPECTION | 15 | | |
| | | 2.7.7 GAS CARRIER INSPECTION | | | |
| | | 2.7.8 MODU/MOU INSPECTION | | | |
| | 2.8 | INSPECTION FORMS AND GUIDANCE | | | |
| | 2.9 | DEFICIENCIES AND OBSERVATIONS | | | |
| | 2.10 | INVOICES | | | |
| | | | | | |

NAUTICAL INSPECTOR GUIDELINES

1.0 INTRODUCTION

This document represents guidelines for use by Nautical Inspectors in carrying out their duties as flag state representatives onboard Republic of the Marshall Islands (RMI) flagged vessels. The procedures contained in this document are intended to ensure that vessel inspections are conducted in a uniform manner consistent with the RMI Maritime Administrator's (the "Administrator") goals of Marine Safety, Security, and Environmental Protection.

1.1 **OBJECTIVES**

The Marine Safety and Vessel Inspections program has three major objectives. First and foremost is to ensure that vessels operating under the RMI flag are in substantial compliance with the RMI Maritime Regulations as well as all applicable requirements of the international conventions to which the RMI is a party. Second, is to assess the performance of the Recognized Organizations (ROs), Recognized Security Organizations (RSOs) that issue statutory certificates on the Administrator's behalf. Third is to identify gaps in the operational management of vessels flying the RMI flag and alert vessel owners and operators, Classification Societies, ROs, and RSOs. of a degradation in performance of vessels under their purview. Pursuit of these objectives will serve to eliminate or identify problems or substandard conditions before they reach a critical level and thus improve safe and quality operation of RMI flagged vessels. In addition, these objectives directly contribute to the registry's goals and responsibility for maritime safety security, environmental protection, and seafarer welfare on RMI flagged vessels.

1.2 **DEFINITIONS**

- 1.2.1 ADMINISTRATOR: the Republic of the Marshall Islands Maritime Administrator.
- 1.2.2 ASI: Annual Safety Inspection.
- 1.2.3 COMPANY: the entity which has been designated by the shipowner as responsible for the management of a vessel under the ISM Code.
- 1.2.4 CONTRACT: the terms agreed between the Administrator and the Inspection Company or individual Nautical Inspector under which inspection services are provided on behalf of the Administrator.
- 1.2.5 DESIGNATED PERSON ASHORE (DPA): the Company point of contact as defined by the ISM Code.
- 1.2.6 DISPENSATION: a short term acknowledgement by the Administrator that a vessel is not in compliance with a specific requirement of SOLAS, MARPOL or other International Convention or RMI regulation.

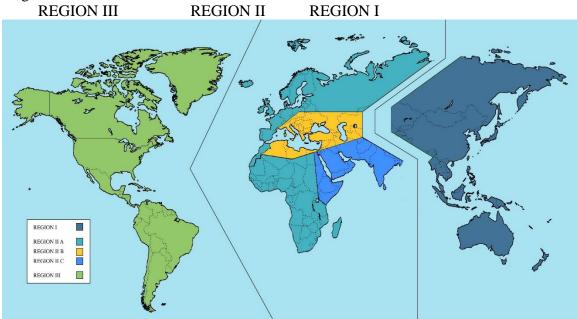
Rev. 11/23 1 MSD 255

- 1.2.7 EXEMPTION: a permanent decision by the Administrator that a specific requirement of SOLAS, MARPOL or other International Convention or RMI regulation does not apply to a particular vessel or class of vessels.
- 1.2.8 NAUTICAL INSPECTOR: an individual or legal entity that, pursuant to RMI Maritime Regulation 5.34, is authorized by the Administrator to board, examine, inspect, or audit vessels registered under the RMI Maritime Act and to perform other appointed functions on behalf of the Administrator.
- 1.2.9 PORT STATE CONTROL (PSC): a local authority empowered by a National Administration to conduct inspections of, and otherwise ensure the safety of, foreign flagged vessels operating in its national waters.
- 1.2.10 RECOGNIZED ORGANIZATION (RO), and RECOGNIZED SECURITY ORGANIZATION (RSO): Classification Societies authorized to act on behalf of the Administrator in performing certain statutory surveys and certification.
- 1.2.11 SHIPDESK: Location where all scheduling of inspections related activities occurs. SHIPDESKs are located in a number of regional offices and all attendance of RMI flagged vessels by Nautical Inspectors are scheduled and coordinated by regional SHIPDESKs.

1.3 ORGANIZATION

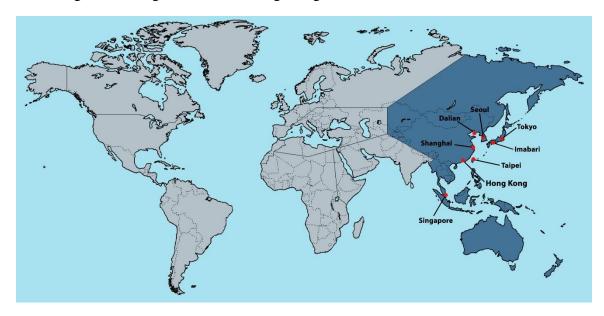
The Administrator's headquarters are located in Reston, Virginia. The Senior Vice President of Fleet Operations, located in Annapolis, Maryland, has overall responsibility for the vessel inspection program. To facilitate its global operations, Fleet Operations is divided into three basic geographic regions. Each of the Regional Offices and some subregions have Regional Fleet Operations Managers acting as the senior Nautical Inspector in that Region and report directly to the Senior Vice President of Fleet Operations on vessel inspection issues and activities.

The Worldwide structure consists of three (3) principle regions as outlined in the below diagram.

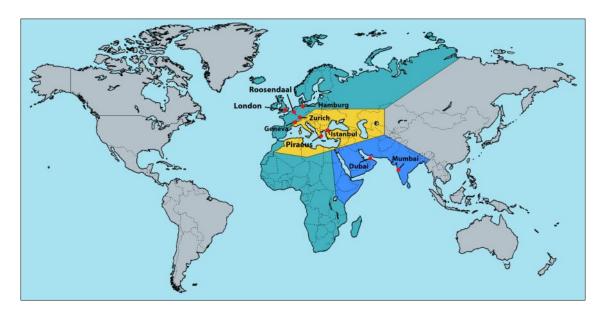


1.3.1 REGION I – FAR EAST: China, the Far East, Southeast Asia, Australia and New Zealand.

The Region I SHIPDESK and Fleet Operations Manager are located in the Hong Kong office. Additional offices are shown for reference only. All inspections related activities are managed and assigned from the Hong Kong office.



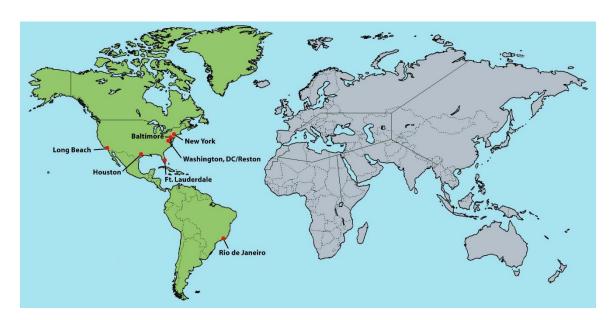
1.3.2 REGION II - Region II is further subdivided into three additional sub-regions as outlined below.



- REGION IIA NORTHERN EUROPE & AFRICA: Northern and Eastern Europe, Eastern Russia, West and South Africa, and Madagascar. Region IIA SHIPDESK and Fleet Operations Manager are located in the Roosendaal, Netherlands office. Additional offices are shown for reference only. All inspections related activities for this region are managed and assigned by the Roosendaal office.
- REGION IIB MEDITERRANEAN: The Mediterranean, Black Sea, and North and West Africa. Region IIB SHIPDESK and Fleet Operations Manager are located in the

- Piraeus, Greece office. Additional offices are shown for reference only. All inspections related activities for this region are managed and assigned by the Piraeus office.
- REGION IIC MIDDLE EAST & INDIA: Middle East, India, and Pakistan. Region IIC SHIPDESK is located in the Dubai and Mumbai offices. This region is further supported by the Fleet Operations Manager located in the Mumbai office. All inspections related activities are assigned from the SHIPDESK in the Dubai and Mumbai offices.
- 1.3.3 REGION III AMERICAS: North, Central, and South America, the Caribbean, Greenland, and the Hawaiian Islands. Region III is subdivided into two (2) sub regions, Region III A and Region III B. The Region III A Fleet Operations Manager resides in Houston, Texas, and the area of coverage includes all U.S. ports and U.S. territories. The Region III B Fleet Operations Manager resides in Fort Lauderdale, Florida and includes all non-U.S. ports. This includes Canada, Mexico, Central America, the Caribbean, and South America. Region III SHIPDESK is located in the Annapolis, Maryland office. Most inspection-related activities for this region with the exception of Offshore Industry inspections, are managed and assigned from the Annapolis office.

Offshore Industry inspections are scheduled and managed from the SHIPDESK in the Houston, Texas office.



Regional Fleet Operations Managers are responsible for monitoring the performance of and providing feedback to the Nautical Inspectors assigned to their area of responsibility. The name and contact information for the Regional Fleet Operations Manager and supporting managers for each Region are contained in Table A below. Nautical Inspectors should reference the below table when contacting the Administration on inspection issues. In addition, there is a Duty Officer available 24 hours a day, 7 days a week who may be contacted for emergency purposes when the Regional Fleet Operations Manager is unavailable.

Table A: Regional Offices and Regional Fleet Operations Managers

| Region | Area of Responsibility | Regional Office, Location / Fleet Operations Managers & personnel | Contact Information |
|--|---|---|---|
| Region I | Asia: Korea, Japan, China, Philippines Southeast Asia: Singapore, Indonesia, Vietnam, Cambodia Pacific: Australia, New Zealand, Pacific Islands | International Registries Hong Kong Capt. Sascha Dyker Richard Dias | +852 (2526) 6641 +60 123 390 575 (mobile) Inspections-HK@register-iri.com SDyker@register-iri.com RDias@register-iri.com |
| Region IIA - Northern Europe | Europe: Spain, Portugal, Atlantic Coast of France, Belgium, Netherlands, Germany, United Kingdom, Scandinavia, Poland, Lithuania, Latvia, Estonia and Eastern Russia | International Registries (Netherlands) BV. Roosendaal, Netherlands Hans Krijger Jan-Rinze Haveman (Acting) | +31 (165) 515-161 +31 619 635044 (mobile) Inspections- Roosendaal@register-iri.com JHaveman@register-iri.com HKrijger@register-iri.com |
| Region IIB – Mediterranean | Europe: South Coast of France, Italy, Malta, Slovenia, Croatia, Albania, Montenegro, Greece, Turkey, Romania, Bulgaria, Black Sea Coast of Russia, Ukraine, Georgia, Cyprus Eastern Mediterranean: Israel, Lebanon, and Jordan North Africa: Morocco, Algeria, Tunisia, Egypt | International Registries Piraeus, Greece Capt. Theodore Lalas Capt. John Sideris | +30 (210) 4293-223 + 30 (6942) 476862 (mobile) Inspections-Piraeus@register- iri.com TLalas@register-iri.com JSideris@register-iri.com |
| Region IIC – Middle East / India | Middle East | International Registries Dubai, UAE Anil Jain | +971-4-337-9974 +971 50 928 1716 (mobile) Inspections-Dubai@register- iri.com AJain@register-iri.com |
| | Asia: India and Pakistan | Mumbai, India Vinod Kumar | +91-22-4064-1111 +91 99878 49737 (mobile) VKumar@register-iri.com |

| Region | Area of Responsibility | Regional Office, Location / Fleet Operations Managers & personnel | Contact Information |
|---------------------|--|---|---|
| Region III | Americas: North, Central and South America Caribbean Greenland | International Registries Houston, Texas James Maupin (Region III A - All vessels in the U.S. and U.S. territories) James Maupin | +1 (713) 627-9955 +1 (832) 331-5529 (mobile) <u>Inspections-Houston@register-iri.com</u> |
| | | International Registries Fort Lauderdale, Florida (Region III B - All vessels in non-U.S. ports – Canada, Mexico, Central America and South America) Davis Kong | +1 (954) 763-7775 +1 (571) 249-7559 (mobile) <u>DKong@register-iri.com</u> |
| | | Offshore Vessels Houston, Texas Roberto Herrera | +1 (713) 627-9955 +1 (281) 433-9458 (mobile) Inspections-Offshore@register- iri.com RHerrera@register-iri.com |
| Duty Officer | World Wide EMERGENCIES ONLY! | Reston, Virginia | +1 (571) 441-1885 dutyofficer@register-iri.com |

1.4 RESPONSIBILITIES

- 1.4.1 Nautical Inspectors are responsible for carrying out activities such as inspections, audits, or investigations as directed by the Administrator. Their responsibilities include, but are not limited to, the following tasks:
 - Conduct Pre-registration inspections on certain vessels as determined by the Administrator for entrance into the RMI Registry;
 - Conduct Initial Inspections on vessels that are newly registered;
 - Conduct ASIs on vessels in the RMI Registry;
 - Conduct Special Inspections (SIs) as directed by the Administrator for vessels that may require additional oversight or special attention as deemed necessary by the Administrator:
 - Conduct Follow-up Inspections to verify that deficiencies previously noted have been corrected;
 - Attend, and provide general assistance during, PSC examination of vessels or report on vessels under PSC detention;
 - Conduct or observe an ISM or ISPS audit;
 - Conduct casualty investigations as directed by the Administrator; and
 - Conduct other audits, inspections, or surveys as directed by the Administrator.
- 1.4.2 Nautical Inspectors receive their instructions from the Regional Office covering the area in which they are based and report to the Regional Fleet Operations Manager. In the event of questions or concerns, Nautical Inspectors should contact their Regional Fleet Operations Manager.

- 1.4.3 Nautical Inspectors are responsible for providing the Regional Office with their current contact information including telephone number, mobile phone number, facsimile number (if available) and email address. Nautical Inspectors are responsible for maintaining computer capability and Internet access necessary for the transfer of information.
- 1.4.4 Nautical Inspectors are required to maintain their knowledge and experience through training and seminars available in the maritime industry. International Registries, Inc. may provide seminars for familiarization on new operational requirements or regulations. Nautical Inspectors are required to be familiar with the requirements of the RMI Maritime Regulations as well as Marine Notices, Marine Guidelines and Marine Safety Advisories. These items can be downloaded from the Administrator's website at: http://www.register-iri.com. Nautical Inspectors are responsible for regularly checking the registry's website since the Marine Guidelines, Notices, and Marine Safety Advisories are updated on a fairly regular basis. Early each year the RMI requirements and regulations are published in the MI-300. A copy of the CD is available on request. Nautical Inspectors are also encouraged to review available PSC inspection information, including information provided by the Paris MOU (www.parismou.org), the Tokyo MOU (www.tokyo-mou.org) and the U.S. Coast Guard (http://cgmix.uscg.mil/psix/).

1.5 QUALIFICATIONS

- 1.5.1 To be designated as a Nautical Inspector an individual must meet the minimum professional qualifications contained in Section 5.34.1 of the RMI Maritime Regulations. These qualifications are those necessary to inspect most types of vessels. In order to inspect vessels that may require more specific inspection qualifications such as LNG carriers or to conduct oversight of ISM/ISPS audits, an individual must have documented experience in these areas.
- 1.5.2 Individuals applying to be an RMI Nautical Inspector should submit a letter with either a résumé or curriculum vitae to one of the Administrator's Regional Offices (see Table A above). The Regional Office will coordinate submission of the appropriate supporting documentation needed to evaluate whether an applicant meets the minimum professional qualifications. In some cases, a trial period may be imposed where a number of safety inspections must be carried out under supervision.
- 1.5.3 Nautical Inspectors' performance will be assessed at a minimum of once every 3 years upon renewal of the Nautical Inspector contract. The evaluation criteria consist of the following:
 - a) Availability (Was the inspector normally available to carry out the inspection?)
 - b) Responsiveness (Was the inspector easy to contact? Did the inspector respond to scheduling requests in a timely manner?)
 - c) Attendance punctuality (Could the inspector be counted on to monitor ship arrival and board as scheduled?)
 - d) Communication (Did the inspector communicate well with agents and operators? Did the inspector contact the Administrator when there are class "A" deficiencies or other serious issues on the ship?)

- e) Performance (Did the inspector adhere to MSD 255? Is there evidence of serious deficiencies identified by Class or PSC after the nautical inspector's attendance (3 months)? Are there complaints concerning the inspector from the crew, operators, PSC, Class or others?)
- f) Documentation (The quality and accuracy of submitted reports and documentation. Was the inspection report narrative written clearly and concisely? Were there any errors in the inspection report or typographical errors? Were representative photographs of the vessel provided? Were invoices and receipts submitted timely and in accordance with the NI contract and MSD 255?)

The Administrator may also periodically assign an in-house flag State inspector to accompany Nautical Inspectors during a safety inspection in order to review the inspector's performance. The evaluation criteria for performance monitoring during the safety inspections consist of the following:

- a) Inspection Planning (Availability: Responsiveness to SHIPDESK, attendance punctuality. Communication: Interaction with agents and operators. Initiative to check vessel history prior to boarding (Equasis, additional information sent by regional offices. Inspection type and scope well understood. Was the inspector aware of the correct inspection forms to be used?)
- b) Inspection Execution (Introduction, interaction with Master, and crew. Vessel document review: Sampling, adequate time allocated, etc. Physical inspection of the vessel. Did the inspector spend 7-8 hours onboard the vessel for the ASI or ISI? Proper witnessing of Operational tests. Any special instructions provided by the regional office reviewed and checked onboard? Planning and conducting drills: Crew familiarization, vessels operational constraints respected, etc. Adequate planning demonstrated in terms of time allocation for various components of the inspection?)
- c) Conduct (Was the inspector professional and courteous? Were the findings such as deficiencies/observations discussed with the Master? Time allowed for rectification of deficiencies.)
- d) Inspection Reporting (Was the inspection report sent in a timely manner? Were all the correct forms used and sent in a legible, assessable manner? Were any class "A" deficiencies discussed with the regional office prior to departing the vessel? Were the inspection forms filled out correctly and error free? Were adequate and relevant photographs provided with the inspection report?)

Nautical Inspectors whose performance is considered to be below the expected standard by the Administrator will be informed directly by the Administrator.

1.6 **AUTHORITY**

Nautical Inspectors are acting on behalf of the RMI Administrator. As such, a Nautical Inspector may be authorized to board an RMI flagged vessel at any time as directed by a Deputy Commissioner of Maritime Affairs. Nautical Inspectors, themselves, are not authorized to board an RMI flagged vessel without the permission of a Deputy Commissioner of Maritime Affairs. Regional Fleet Operations Managers are all Deputy Commissioners of Maritime Affairs. In addition, SHIPDESK schedulers are directly authorized by Regional Fleet Operations Managers to schedule Nautical Inspectors for inspections. A Nautical Inspector is not authorized to approach a Company in anticipation that an inspection may be due, or to board a vessel without instruction from the Regional

Fleet Operations Manager. A Nautical Inspector is also not authorized to issue Exemptions or Dispensations of regulations or unduly delay or detain a vessel without permission from the Regional Fleet Operations Manager.

1.7 IDENTIFICATION CARDS

- 1.7.1 The Administrator will issue an identification (ID) card to all RMI Nautical Inspectors. This ID card is to be used only as evidence that the individual to whom it was issued is duly authorized by the RMI to carry out the duties of a Nautical Inspector pursuant to the provisions of the RMI Maritime Law and Regulations. The ID card is non-transferable. In the event that the ID card is lost or destroyed, the Regional Office should be notified immediately so that a replacement can be issued. The ID card is the property of the Administrator, and as such, can be revoked without notice. If revoked it must be surrendered to the Regional Office.
- 1.7.2 When entering a port facility to attend a vessel, Nautical Inspectors should be aware that some port authorities may not accept the ID card issued by the Administrator as adequate personal identification. Nautical Inspectors should be familiar with local personal identification requirements and ensure they have the appropriate identification.

1.8 CONTRACTS

- 1.8.1 Contracts will be offered to individuals who meet the professional training qualifications and who are in ports or areas where Nautical Inspectors are needed. Contracts may also be offered to Inspection Companies who employ multiple inspectors. When this occurs, only the individuals issued an RMI Nautical Inspector ID card may conduct inspections on behalf of the Administrator. An Inspection Company wanting additional inspectors added must provide the documentation required in Section 1.5 above.
- 1.8.2 An individual or Inspection Company entering into a contract with the Administrator agrees to fulfill the responsibilities outlined in the contract as well as all of the duties of a Nautical Inspector outlined in RMI Maritime Regulation 5.34 and Marine Notice No 5-034-1, these Guidelines, and any directions from the Administrator, its designee, or the Regional Fleet Operations Manager. Supervisors of Inspection Companies are expected to provide adequate oversight of their employees to ensure individual inspectors meet these responsibilities.

2.0 INSPECTIONS

2.1 GOALS

- 2.1.1 The primary goals of the Administrator's inspection program are:
 - to confirm compliance with the applicable international and RMI safety, security, environmental protection, and seafarer welfare standards;
 - to audit the performance of the RO and/or RSO authorized to act on behalf of the Administrator; and
 - to identify gaps in the operational management of vessels flying the RMI flag and alert vessel owners and operators, Classification Societies, ROs, and RSOs of a degradation in performance of vessels under their purview.

2.1.2 To achieve these goals, Nautical Inspectors are assigned to carry out inspections and/or audits, and to conduct casualty investigations as necessary that may also provide additional feedback on inspection and compliance activities.

2.2 TYPES OF INSPECTIONS AND/OR AUDITS

- 2.2.1 Pre-Registration Inspection (Pre-Reg): Pre-Registration Inspections may be required on certain vessels that have applied for registration. This inspection is carried out prior to acceptance of a vessel for registration and is focused on assessing the general condition of the vessel and its ability to meet the Administrator's standards of quality and compliance.
- 2.2.2 Initial Safety Inspection (ISI): An inspection conducted within 60 days following registration of a vessel, to check that it meets, and is being operated in accordance with, all national and international rules and regulations.
- 2.2.3 Annual Safety Inspection (ASI): An inspection conducted annually to verify a vessel is being maintained to the Administrator's standards of quality and is in substantial compliance with all applicable national and international rules and regulations.
- 2.2.4 Special Inspection (SI): An inspection conducted as determined by the Administrator on vessels that may require additional oversight or when circumstances that the vessel may be involved with warrant additional scrutiny or presence by the Administrator, such as a PSC examination or detention, an additional audit by the RO that has been required by the Administrator, or inspections on a more frequent basis that are required by the Administrator. A special inspection may also be performed for Quality Control purposes. In this case the inspection will be recorded as a Special Inspection, Quality Control Boarding (SI-QCB). These inspections may be conducted for any number of reasons, including assisting an owner or operator with compliance activities. The scope of this type of inspection may vary depending on the circumstances for the inspection and may be conducted as announced inspections or unannounced inspections. The Administrator's observance of an ISM or ISPS audit being conducted by an RO or RSO would also be included under this category of inspection.

2.3 SCHEDULING

- 2.3.1 The ship owners/operators and ship Masters are required to make their vessels available for inspection by the Administrator. All inspections are arranged by the Administrator. Nautical Inspectors shall not try to arrange inspections with RMI flagged vessels without the Administrator's authorization.
- 2.3.2 A notice of inspection due is forwarded to the DPA of the vessel when the vessel comes in the window for an inspection. The windows for vessel inspections are as follows:
 - Pre-Registration Inspections: There is no window associated with this type of inspection. This inspection is normally conducted prior to acceptance for registration and in accordance with the Administrator's specific requirements.
 - Annual Safety Inspections: The annual inspection date is set annually at the date that the Initial Inspection was completed. The window for inspection is + or one (1) month from this date. However, for MODUs and some vessels in hard to reach locations this window may be extended to + or three (3) months.

- Special Inspections: The window for special inspections is + or one (1) month from the due date of the special inspection.
- 2.3.3 When the DPA receives the notice of inspection due, he/she should follow the instructions in the letter for scheduling the inspection.
- 2.3.4 The following is a brief outline of the normal scheduling process:
 - A notice is sent to the DPA of a vessel via the Administrator's automated notification system that the vessel is due for inspection.
 - The DPA replies and indicates the vessel will be available for inspection on certain dates and locations.
 - The regional SHIPDESK for the proposed location will further coordinate the dates and times of the inspection with the DPA and the Nautical Inspector, specifically:
 - The SHIPDESK notifies the Nautical Inspector of a potential vessel inspection by telephone or email.
 - The Nautical Inspector confirms availability to conduct the inspection and advises
 if the inspection will include any additional expenses. Additional expenses are
 applicable only as defined in the Nautical Inspector's contract.
 - The SHIPDESK verifies approval of the additional expenses with the owner/operator before the inspection is authorized. The Nautical Inspector should not contact the owner or manager for approval of additional expenses.
 - Once the inspection is authorized by the Fleet Operations Manager and any additional expenses verified or approved by the owner/operator, the SHIPDESK advises the Nautical Inspector via email or phone of the vessel's local agent contact details, the ship's ETA, berthing location, schedule and departure date. Inspections are generally conducted after berthing and customs and immigration clearance.
 - o The regional SHIPDESK may provide additional instruction as to when the inspection is to be conducted. The Nautical Inspector should not deviate from these instructions without consulting the regional SHIPDESK. Any changes to the date of the inspection shall be reported immediately to the regional SHIPDESK for review and approval before proceeding with the inspection.

2.4 PREPARATION

- 2.4.1 Upon receipt of an inspection assignment, the Nautical Inspector should have available an electronic and hard copy of the most recent version of the following inspection forms available from the website at https://www.register-iri.com/.
- 2.4.2 The regional SHIPDESK sends an electronic version of the MSD 252SUPP to the DPA via email, requesting that the Master have an officer from his crew complete this form and have it available for review/auditing during the inspection.
- 2.4.3 Prior to the inspection, the Nautical Inspector must review any vessel information or instructions provided by the SHIPDESK. The Nautical Inspector is encouraged to contact the regional SHIPDESK should there be questions or concerns regarding the assignment.

2.5 PROCESS

- 2.5.1 A typical initial or annual safety inspection is expected to require a minimum of seven (7) or eight (8) hours onboard the vessel to complete. Due to the number of items to be confirmed, most inspections are expected to require a minimum of eight (8) hours to complete. The time to complete an inspection depends on the ship type/size and any additional instructions that may have been provided by the regional SHIPDESK. Special Safety Inspections may require less time as their scope may be limited to certain areas of the ship or to verification that all critical systems and equipment are being maintained and functional. Follow-up inspections may also require less time as they are intended to verify that deficiencies issued during a prior inspection have been rectified.
- 2.5.2 The Nautical Inspector should explain to the Master the purpose, scope and schedule for the inspection and request the Master's cooperation in scheduling muster, fire and boat drills at a convenient time. The Master should confirm if the DPA, Superintendent, Port Engineer or other owner's representatives are available onboard. The Nautical Inspector should request an escort for the purpose of conducting the inspection. In rare cases where the Master has reasonable arguments why the inspection cannot be carried out, it should be respected and the SHIPDESK contacted for guidance.
- 2.5.3 The MSD 252SUPP should be completed by the crew prior to the inspection and is to be acknowledged by the Master for correctness. A random check or audit should be carried out on a number of documents and certificates listed on the supplement. The audit is to be carried out to the extent that the inspector is satisfied, and verifies that the information provided in the MSD 252SUPP is correct. This allows more time for the inspector to focus on the material condition of the ship and the performance of the crew in execution of their duties and emergency drills. Should the inspector board the vessel and the supplement is not completed, the inspector is to instruct the Master to have this completed by a ship's officer. The inspector can then review the supplement with the Master at the end of the inspection.
- 2.5.4 The MSD 252 provides the inspector with a scope of the inspection by topic, but there is no requirement to follow the sections in the order listed on the inspection form. Ship operational requirements or weather related reasons, may require that the physical inspection and drills be carried out prior to checking the documents. It is also advisable to conduct operational test and examination of critical systems early in the inspection to allow time for rectification of any deficiencies without unduly delaying the vessel. In this regard, at the beginning of the inspection the ship staff should be given an opportunity to inform the Nautical Inspector about the ship's condition, statutory compliance, crew wellness and performance.
- 2.5.5 Inspections should be scheduled so the inspection of the weather decks, lifesaving gear as well as boat drills can be completed during daylight hours. A minimum of four (4) hours of daylight is required for the typical safety inspection. Inspections carried out with less daylight time must be specifically authorized by the regional SHIPDESK.

2.6 CONDUCT

The following rules of conduct apply to Nautical Inspectors when they are performing their inspection duties:

- Always act professionally and courteously in conducting inspections. Remember you
 are acting as a representative of the Administrator and as such you are to be professional
 at all times.
- Remember that a ship is a home as well as a workplace for the ship's personnel and do
 not unduly disturb their rest or privacy. Comply with any ship housekeeping rules such
 as removing dirty shoes or work clothes.
- Avoid being prejudiced by the race, religion or nationality of the crew when making decisions, treating all personnel on board with respect.
- Respect the authority of the Master.
- Be polite but professional and firm as required. Never become threatening, abrasive or dictatorial or use offensive language.
- Comply with all health and safety requirements of the ship. Do not take any action or cause any action to be taken which could compromise safety.
- Apply the RMI rules, regulations and the convention requirements in a consistent and professional way.
- Do not try to entrap the crew, for example by asking them to do things that are contrary to the Conventions.
- Request the crew to demonstrate the functioning of equipment and operational activities, such as drills. Inspectors shall not operate any shipboard equipment or systems. Inspectors should also refrain from giving instructions to crew members on how to operate equipment. Remember when witnessing an operational test of equipment or a drill, the crew is performing the test or drill and you are only there as a witness. Never jump in and perform the operation yourself. If you see a safety issue during a drill or operational test you ask the Master or Chief Engineer or the representative escorting you to stop the operation and resolve the safety issue.
- Deal with any disagreement over the conduct or findings of the inspection calmly and patiently. Advise the Master that his complaints will be taken note of, and additionally that the Master should inform the company DPA about any disagreement.
- Make decisions based on the findings of the inspections and not on any commercial considerations. Firmly refuse any attempts of bribery and report any blatant cases to your Regional Fleet Operations Manager. Misuse of authority for financial or personal benefit is prohibited.

2.7 INSPECTION DETAILS AND FORMS

2.7.1 PRE-REGISTRATION INSPECTION (Pre-Reg)

The Pre-Reg is conducted on certain vessels applying for registration to assess the general condition of a ship and its ability to meet the quality standards of the RMI. The Pre-Reg inspection form should be accompanied by sufficient pictures of all applicable items detailed in the form. In addition, the Pre-Reg form shall include a recommendation from the inspector whether or not this vessel should be considered for registration. When a vessel does not meet the criteria and expectations for registration in the RMI, the Pre-Reg report is to be completed with a list of defects and findings that support the areas found deficient.

As there is little time available between the Pre-Reg and the proposed date of the sale, it is important that the full report be sent by email within 72 hours of the completion of the inspection. Nautical inspectors are cautioned against entering any tanks (ballast, fore peak, double bottom and upper wing tanks, etc.) unless they have been certified safe for personnel by a "marine chemist".

2.7.2 INITIAL SAFETY INSPECTION (ISI)

The ISI is carried out within 60 days following registration. It serves the purpose of verifying that the ship is being operated in compliance with all national and international rules and regulations and that all procedures are in place so that the vessel remains in compliance during operations and trade. The date of completing the initial inspection will become the anniversary date for the annual inspection. The scope of this inspection is the same as the annual inspection.

2.7.3 ANNUAL SAFETY INSPECTION (ASI)

The ASI is due one (1) year after the ISI and every subsequent year. This inspection falls due each year on the anniversary date of the Initial Inspection. This inspection may be carried out within the period one (1) month before and one (1) month after the anniversary date. MODUs and certain vessels in hard to reach locations may be given a window of three (3) months on either side of the anniversary date. The date on which the next inspection falls due remains one (1) year after the anniversary date regardless of when the ASI is conducted. The ASI is to verify the level of compliance, provide oversight on RO performance, and provide an objective report on ship and crew performance to the benefit of the owners/ managers.

2.7.4 SPECIAL INSPECTION (SI)

An SI is carried out when the Administrator has determined a particular vessel or operator may require additional oversight for compliance with national and international standards. An SI may also be carried out when port State authorities have raised a substantial amount of deficiencies or the vessel has been involved in port State control actions or a detention. As indicated earlier, the Administrator may carry out an SI any time the circumstances the vessel is involved with may warrant additional scrutiny or assistance. Additionally, an SI may be initiated through information available from an RO or a third party through websites such as Equasis, Rightship or Lloyds List. An SI is normally not credited toward completion of an ASI.

2.7.5 SPECIAL INSPECTION – QUALITY CONTROL BOARDING (SI-QCB)

An SI may also be performed for quality control purposes. In this case the inspection would be referred to as an SI, Quality Control Boarding (SI-QCB). The SI-QCB may be conducted for any number of reasons including to assist an owner or operator with compliance activities by conducting a random quality overview of the condition and compliance of a vessel. These inspections may be conducted announced or unannounced as "spot checks" on compliance activities on a vessel. Additionally, an SI-QCB may also be conducted to gauge the performance of an RO or RSO in performance of their duties. An SI-QCB would normally not be credited toward completion of an ASI.

2.7.6 PASSENGER VESSEL INSPECTION

Passenger vessel inspections are conducted semi-annually or basically at six-month intervals. The specific scope of the passenger vessel inspection may vary depending on the findings and level of compliance identified at the previous inspection. The inspection conducted on the anniversary of the ISI will normally be considered as the ASI and the inspection conducted six (6) months later or halfway through the year will be recorded as a SI. In addition to these inspections, passenger vessels may also be subject to a SI-QCB at the discretion of the Administrator.

2.7.7 GAS CARRIER INSPECTION

Liquefied Gas Carriers require a supplemental inspection tailored to examine the additional systems such as cargo handling equipment for these types of vessels. A supplemental inspection form (MSD 252 LGC) in addition to the normal MSD 252 is to be filled out during the ASI. This supplemental form may also be required during a SI of a gas carrier.

2.7.8 MODU/MOU INSPECTION

Mobile offshore drilling units (MODUs) and mobile offshore units (MOUs) are also subject to an ASI. However, the window to complete the annual inspection on these vessels may be extended up to three (3) months before or after the date the inspection is due. This is primarily due to these vessels being in a number of remote locations and the difficulty with arranging Nautical Inspectors to attend in the remote locations. Inspections on MODUs/MOUs use the MSD 252 MODU/MOU form as a job aid and for recording the major details of the inspection.

2.8 INSPECTION FORMS AND GUIDANCE

All forms shall be filled out electronically. The Administrator will not accept handwritten inspection forms. The following table is a reference for Nautical Inspectors regarding the forms required to be submitted to the Administrator.

| Inspection Type | Form(s) | Details |
|-----------------|------------------------|--|
| Pre-Reg | MSD 252PRE-REG | Entire form shall be filled out including an assessment by the inspector as to the ability of the vessel to meet and sustain compliance with the Registry's quality standards. |
| | | All items on the form should be marked either "good", "fair" or "poor" regarding the condition of the item. Items marked "poor" must have clear accompanying remarks and photos of the condition observed. |
| | | The original form or copy is NOT to be left on the vessel. Pre-Reg form shall be forwarded to the registration department through the regional SHIPDESK. |
| ISI | MSD-252SUPP MSD-252 | Completed supplement form shall be collected at the beginning of the inspection and reviewed by the inspector during the course of the inspection. If the supplement has not been completed by the crew, the inspector shall hand a blank copy to the Master for completion by the crew during the inspection. Before conclusion of the inspection, the inspector should collect the form, review it, and audit a sampling of the items on the supplement. |
| | | Entire MSD 252 shall be filled out electronically for submission to the Administrator. It is not necessary to fill the form out while onboard the vessel. It is preferred this is done afterwards so more time is spent on the physical inspection of the vessel. |
| | | Preliminary report pages (clearly marked) are to be completed manually or electronically and left onboard prior to departure of the vessel. |

| Inspection Type | Form(s) | Details |
|------------------|------------------------|--|
| ASI | MSD 252SUPP MSD 252 | Completed supplement form shall be collected at the beginning of the inspection and reviewed by the inspector during the course of the inspection. If the supplement has not been completed by the crew, the inspector shall hand a blank copy to the Master for completion by the crew during the inspection. Before conclusion of the inspection, the inspector should collect the form, review it, and audit a sampling of the items on the supplement. Entire MSD 252 shall be filled out electronically for submission to the Administrator. It is not necessary to fill the form out while onboard the vessel. It is preferred this is done afterwards so more time is spent on the physical inspection of the vessel. Preliminary report pages (clearly marked) are to be |
| SI | MSD 252 | completed manually or electronically and left onboard prior to departure of the vessel. Only the Narrative and Deficiency pages need to be filled out for a special inspection. However, there may be a case where the Administrator may request additional details or the entire form to be completed |
| SI-QCB | MSD 252 | based on the nature of the special inspection. While conducting a quality control boarding special inspection only a Narrative and Deficiency page is required for submission to the Administrator. Additionally, all items marked "* QCB item" on the MSD 252 form must be completed by the nautical inspector to the maximum extent possible. |
| Passenger Vessel | MSD 252SUPP MSD 252 | Completed supplement form shall be collected at the beginning of the inspection and reviewed by the inspector during the course of the inspection. If the supplement has not been completed by the crew, the inspector shall hand a blank copy to the Master for completion by the crew during the inspection. Before conclusion of the inspection, the inspector should collect the form, review it, and audit a sampling of the items on the supplement. |
| | | Entire MSD 252 shall be filled out electronically for submission to the Administrator. It is not necessary to fill the form out while onboard the vessel. It is preferred this is done afterwards so more time is spent on the physical inspection of the vessel. |
| | | Preliminary report pages (clearly marked) are to be completed manually or electronically and left onboard prior to departure of the vessel. The Administrator may provide specific instructions for |
| | | recording the second inspection required in a one (1) year period. |

| Inspection Type | Form(s) | Details |
|-----------------|------------------|---|
| Gas Carriers | MSD 252SUPP | Completed supplement form shall be collected at the |
| | | beginning of the inspection and reviewed by the |
| | MSD 252 | inspector during the course of the inspection. If the |
| | | supplement has not been completed by the crew, the |
| | MSD 252 LGC | inspector shall hand a blank copy to the Master for |
| | | completion by the crew during the inspection. Before |
| | | conclusion of the inspection, the inspector should |
| | | collect the form, review it, and audit a sampling of the |
| | | items on the supplement. |
| | | Entire MSD 252 and MSD 252 LGC shall be filled out |
| | | electronically for submission to the Administrator. It is |
| | | not necessary to fill the form out while onboard the |
| | | vessel. It is preferred this is done afterwards so more |
| | | time is spent on the physical inspection of the vessel. |
| | | |
| | | Preliminary report pages (clearly marked) are to be |
| | | completed manually or electronically and left onboard |
| | | prior to departure of vessel. |
| MODU/MOUs/ | MSD 252 MODU-MOU | The MODU inspection form is similar to the regular |
| Drillships | | MSD 252 but modified to pertain specifically to |
| | | MODUs, MOUs, and Drillships. |
| | | Entire MSD 252 shall be filled out electronically for |
| | | Entire MSD 252 shall be filled out electronically for submission to the Administrator. It is not necessary to |
| | | fill the form out while onboard the vessel. It is preferred |
| | | this is done afterwards so more time is spent on the |
| | | physical inspection of the vessel. |
| | | F7 F |

2.9 DEFICIENCIES AND OBSERVATIONS

One of the primary goals of the inspection process is to confirm compliance with applicable international and national standards. In this capacity, deficiencies or observations issued during a Flag State Inspection are important references to assist owners, operators, and crew with compliance. The following definitions shall be employed when issuing a deficiency or observation.

DEFICIENCY: A condition or finding that the arrangement, equipment, or operation is not in line with the international conventions or national requirements.

Note: Flag State Inspectors should ensure there is an applicable reference to either an international or national standard before recording a deficiency. The deficiency statement should clearly state what is deficient. Opinions or references to how something should be done should not be recorded in a deficiency statement. However, the deficiency statement may include a general reference to what is expected to resolve the stated deficiency. For example, the deficiency of an inoperable emergency fire pump can be recorded in several different ways.

Emergency fire pump inoperable.

Or

Properly repair emergency fire pump.

Again, the deficiency statement should not reflect <u>how</u> items should be repaired or <u>who</u> should repair them. Some examples of improper recording of this deficiency are listed below.

The emergency fire pump is not working properly and should be overhauled by the crew.

Or

Repair the emergency fire pump by completing an overhaul on the pump.

Even though you may be a former seafarer, engineer, or deck officer, and you know exactly what should be done to rectify a deficient item, it is very important as a Flag State Inspector that you do not imply or tell the operator or crew how to fix or repair a deficiency. You may state in general terms what is to be repaired such as stated above; "Properly repair emergency fire pump", but you should not provide details of how in your opinion the emergency fire pump should be repaired.

The Administrator further breaks down deficiencies into two categories.

CLASS A DEFICIENCIES: Class A deficiencies are serious deficiencies that may represent an immediate danger to the crew, the ship, or the environment. These are deficiencies that should normally be resolved prior to a vessel sailing. When Class A deficiencies are noted on a vessel the inspector shall notify the Administrator prior to departing the vessel or concluding the onboard inspection. The Administrator will provide immediate guidance to the inspector on how a Class A deficiency should be handled.

CLASS B DEFICIENCIES: All other deficiencies are considered Class B deficiencies. These may be items that represent non-compliance with a national or international standard, but may not pose an immediate danger to the crew, the ship, or the environment.

OBSERVATION: An observation is something an inspector sees or notices that may not yet be a deficiency but if not attended to may result in a future deficiency or hazard. It may represent a work practice not being done in accordance with good marine practice or common sense or reflect a need for improved performance or capability by the crew in a certain area. Some examples of observations may include:

Flares about to expire shortly after the inspection.

Liferafts due for servicing next month.

RECOMMENDATIONS: The Administrator does not make recommendations. That is the responsibility of the classification society.

2.10 INVOICES

Invoices from Contracted Nautical Inspectors must contain the following items:

- The Type of Inspection and Inspection Fee in accordance with the NI contract.
- Date and Location of where the inspection took place.
- Name of Vessel and the RMI official number
- Name of the Inspector
- Bank Details for payment
- Inspection Company's internal Invoice Number
- A breakdown of any additional charges such as additional inspection time, travel and any incidentals
- Receipts for all expenses.

Invoices shall be sent via email to regional offices. Nautical Inspectors shall submit the invoice along with the Nautical Inspection report within 10 days following the date of the inspection.