

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 (renewed 14 February 2024)

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is evaluated annually by the Administrator and expires one year after its issuance or renewal unless otherwise noted, superseded, or revoked.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