

# PORT STATE CONTROL (PSC) INSPECTIONS: 旗国の使命

Presented By:  
**Sascha Marcel Dyker**, Fleet Operations Manager  
(International Registries (Far East) Limited)

Japan – PSC Update Seminar | March 2025

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# PORT STATE CONTROL (PSC) INSPECTIONS: THE ROLE OF THE FLAG STATE

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Japan – PSC Update Seminar | March 2025

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### 2024 PSC拘留に係るヒートマップ（拘留件数）



3

3

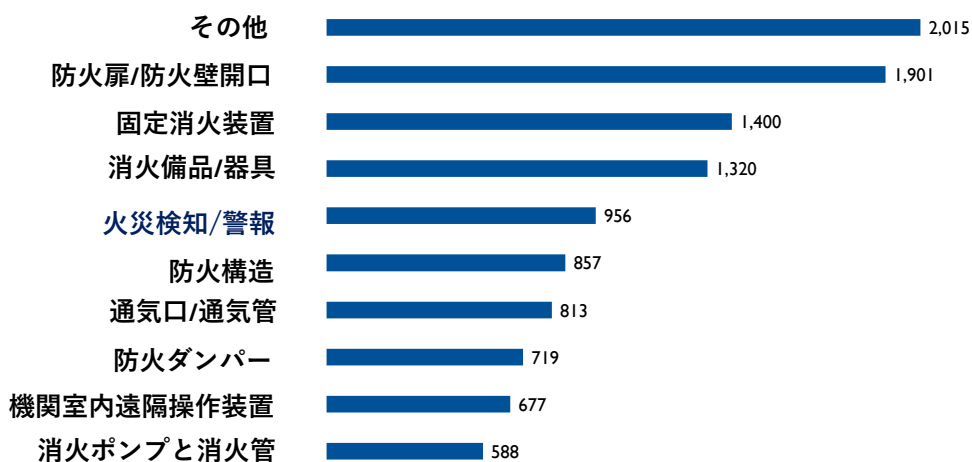
### 2024 DETENTIONS HEAT MAP



4

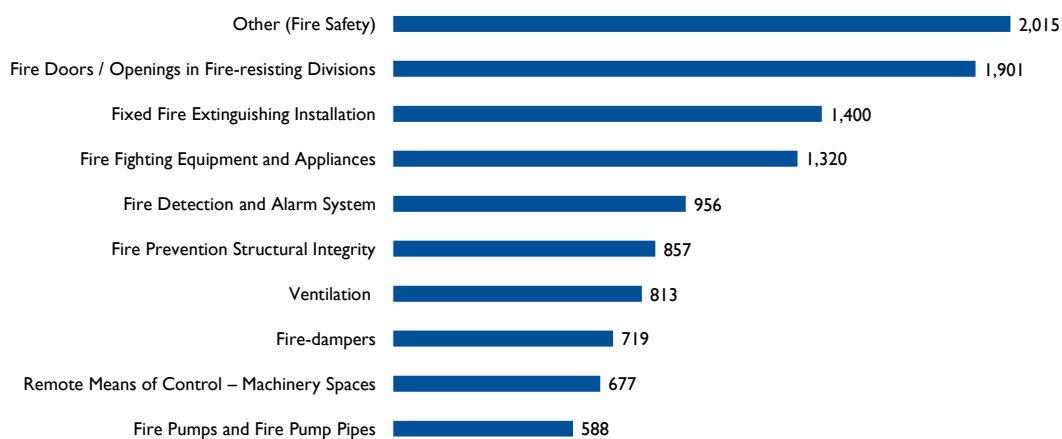
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## 2024 年 東京 MoU に拠る防火設備欠陥上位 10 – 全船籍



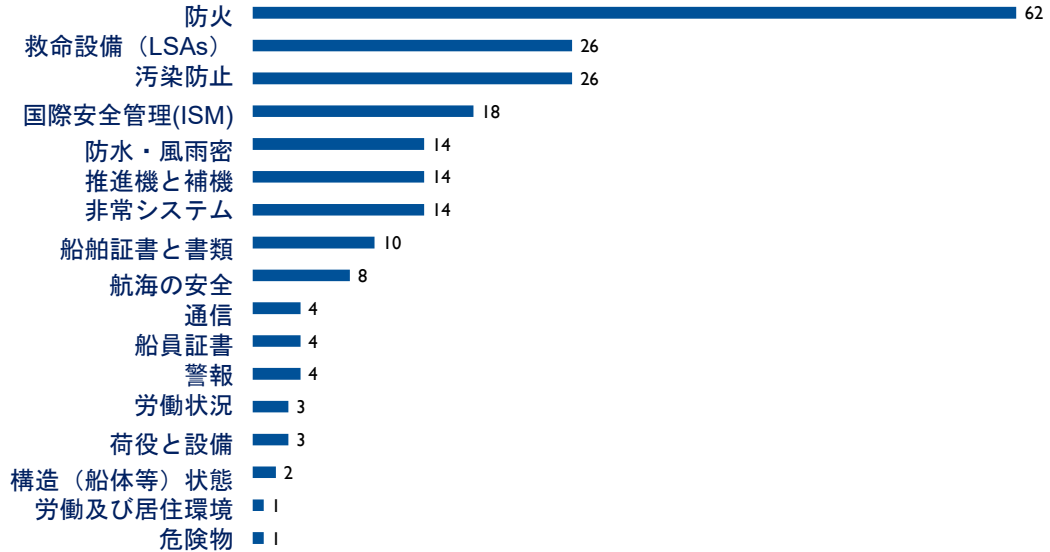
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## TOKYO MEMORANDUM OF UNDERSTANDING (MoU) TOP 10 FIRE SAFETY DEFICIENCIES FOR ALL FLAG STATES – 2024



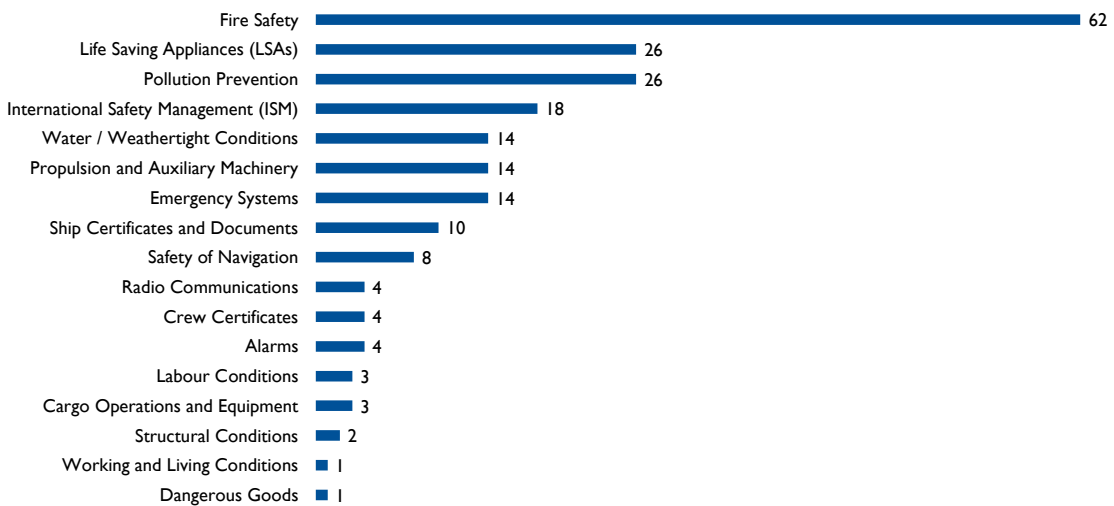
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## 2024年Tokyo MoU –RMI船の拘留に繋がる欠陥 (件数順)



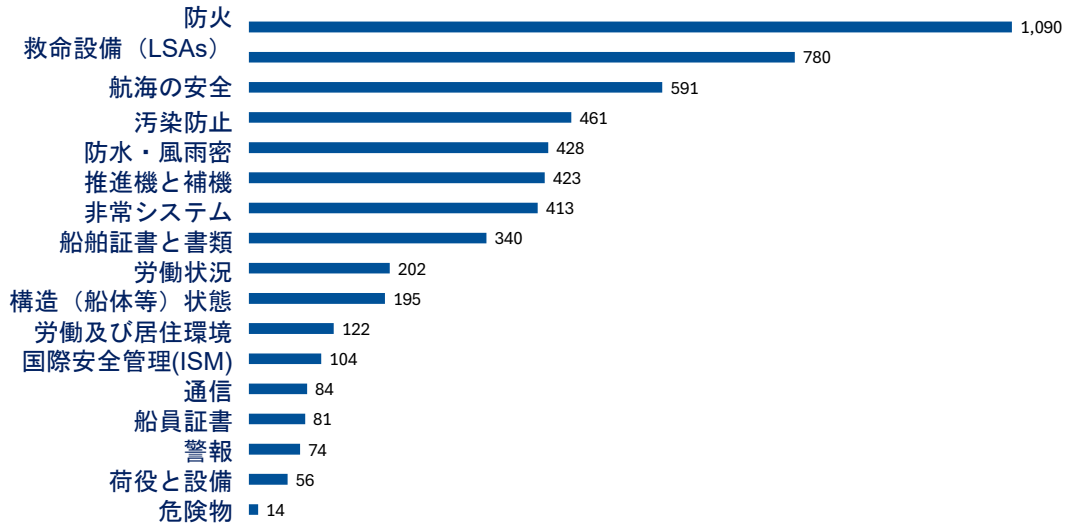
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## TOKYO MoU RMI DETAINABLE DEFICIENCIES – 2024



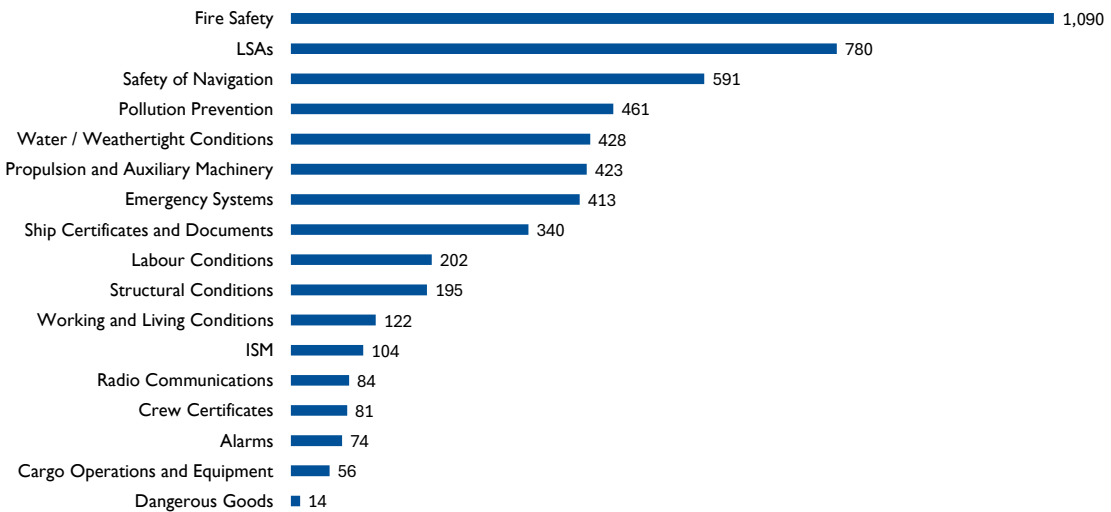
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## 2024年 マーシャルアイランド籍船の東京 MoU による不具合（指摘）点



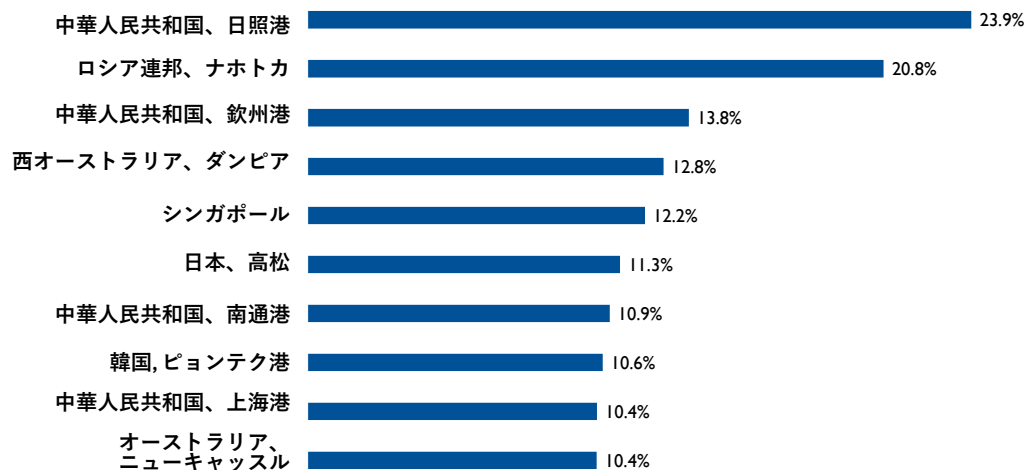
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## TOKYO MoU RMI DEFICIENCIES – 2024



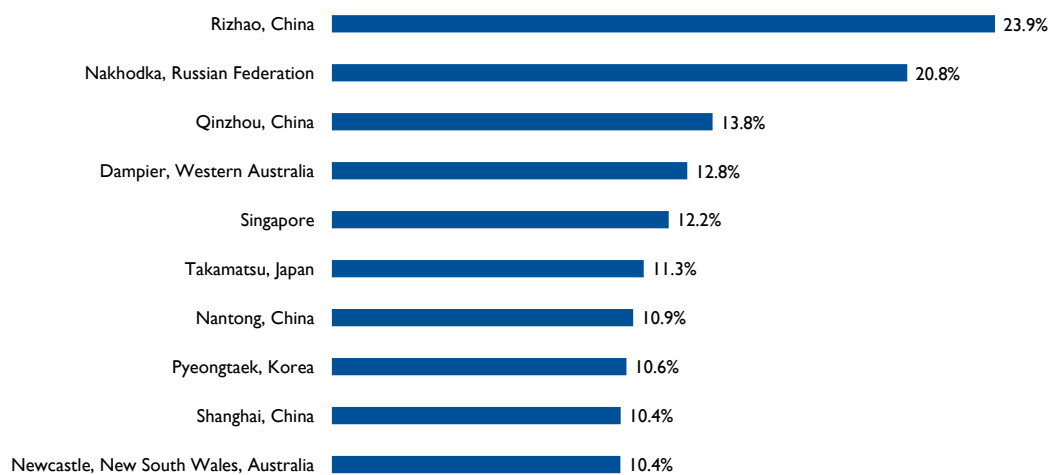
10

## 2024年 地域別「東京MoU 拘留率」上位10



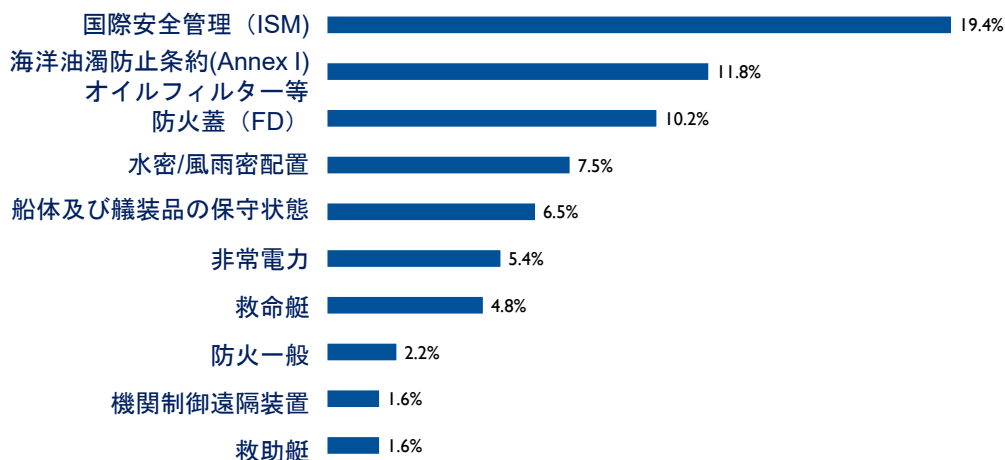
11

## TOP 10 TOKYO MoU DETENTION RATIOS BY AREA – 2024



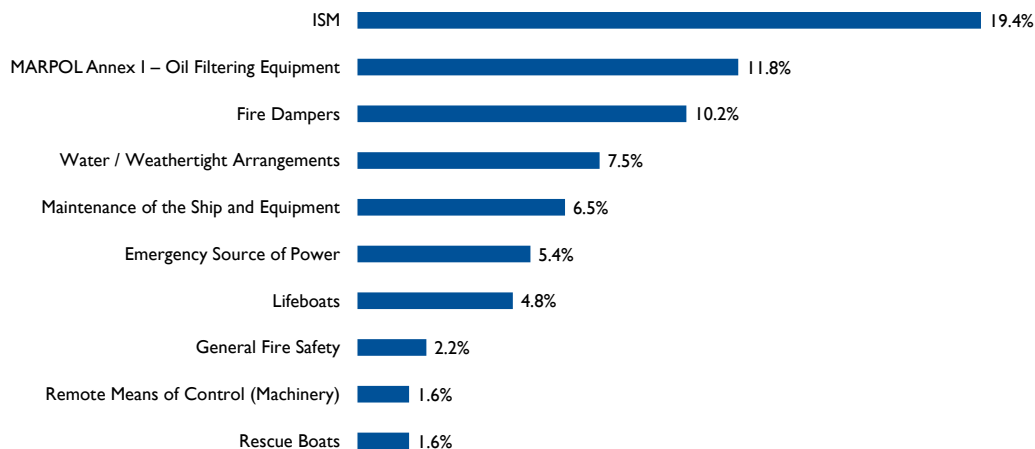
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## 2024年 オーストラリア海上安全局(AMSA)による マーシャルアイランド籍船の拘留に繋がる不具合上位10



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## TOP 10 RMI DETAINABLE DEFICIENCIES AUSTRALIAN MARITIME SAFETY AUTHORITY (AMSA) – 2024



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# Region I (登録・技術・安全) サポート



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# REGIONAL SUPPORT



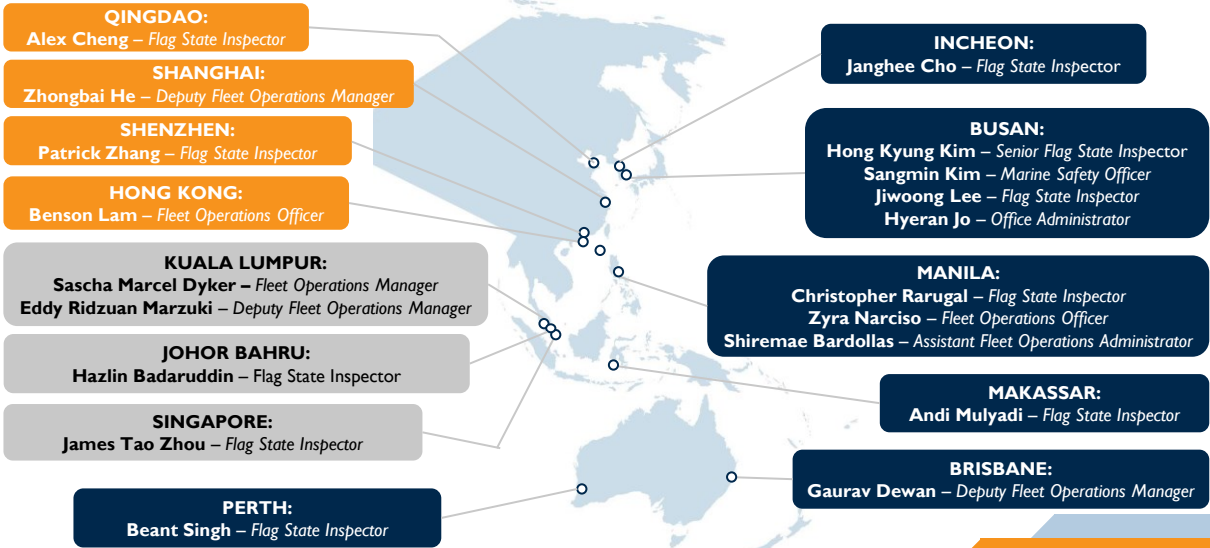
**Captain Sascha Marcel Dyker**  
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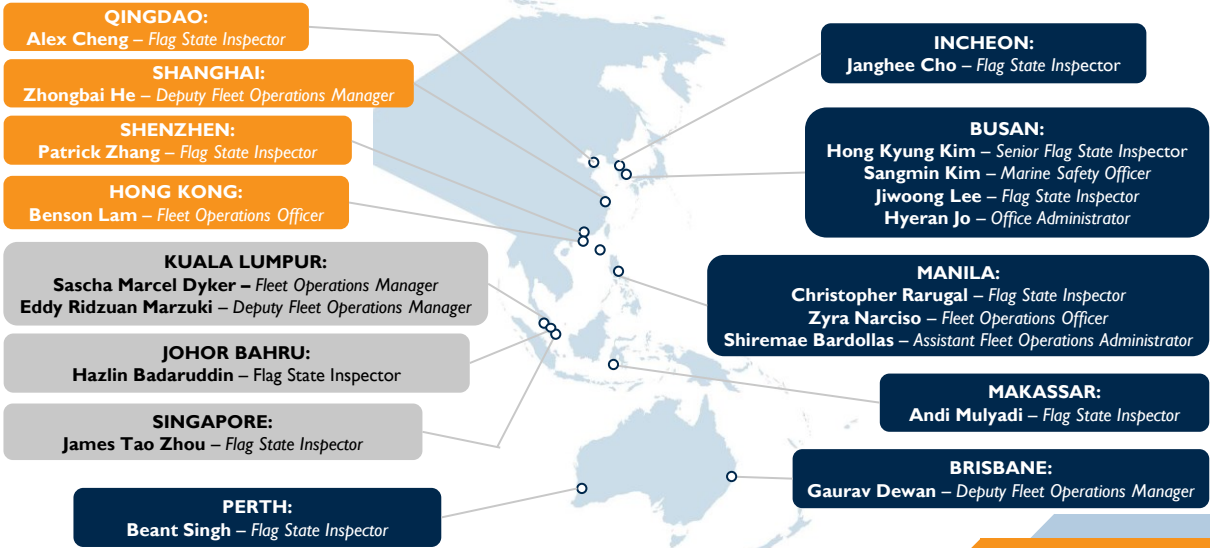
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# FLEET OPERATIONS TEAM – REGION I



# FLEET OPERATIONS TEAM – REGION I



## (PSCと) 信頼・協力関係を築く世界共通の方法

### やるべき事

- ✓ 透明性 (隠ぺい無し)
- ✓ 入港前の (規則) 適合性の確認
- ✓ いかなるPSC職員にも意識集中
- ✓ 入港前に分かっている、或いは危惧される問題点を旗国に連絡、相談
- ✓ 入港先、船級/船舶検査団体 (RO) に支援要請

### やってはならない事

- ✗ 不具合を隠そうとする
- ✗ 作動しない機器の言い訳説明。
- ✗ 既に分かっている問題点をPSCが乗船、旗国に警告を出すまで待つ。
- ✗ 入港先以外の船級/船舶検査団体 (RO) にアシストを頼む。
- ✗ (PSC 検査官に対する) 非友好的、職業人としてあるまじき、或るは傲慢な態度。

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## GLOBAL BEST PRACTICES FOR BUILDING TRUST AND COOPERATION

### DO

- ✓ Be transparent
- ✓ Carry out real-time compliance checks prior to arrival
- ✓ Give any PSC official your full attention
- ✓ Be in communication with the flag, prior to arrival, on any known or perceived issues of non-compliance
- ✓ Request assistance from the local Class / Recognized Organization (RO) office

### DO NOT

- ✗ Try to hide deficiencies
- ✗ Give excuses for non-operational equipment
- ✗ Wait until PSC is on board to alert the flag of a known issue
- ✗ Request assistance only from the Class / RO office other than the local office where the ship is located
- ✗ Be unfriendly, unprofessional or arrogant towards PSC officers

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## 機関室脱出用トランクに係るPSCの見解

- **A類機関区域から2経路の鋼製はしごによる脱出設備がSOLAS Regulation 11-2/13.4.2.1.1で要求され、その一つは同区域の底部から外部の安全な場所まで囲壁の中に設置しなければならない。**
- **MSC.1/Circ.1511 (SOLAS共通解釈)は「機関区域は作業用/通行用プラットフォーム、或いは(船殻構造)デッキ間にある(部分的)中間デッキを含む」とし、機関区域内に於ける低層部を最も低いところにあるデッキ、プラットフォーム、或いは通路としている。**
- **IACSの共通解釈UI SC 277は「2016年2月1日以降の建造船について「A類機関区域は作業用プラットフォーム、通路、又は(船殻構造デッキ間にある部分的)中間デッキを含むとし、同区画の底部を最も低いところに位置するデッキ、プラットフォーム、又通路と見做している。**

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## REGION I – CURRENT PSC MATTERS ENGINE ROOM (ER) ESCAPE TRUNK

- Safety of Life at Sea (SOLAS) Regulation 11-2/13.4.2.1.1 requires that two means of escape shall be provided from each machinery space of Category A. When two sets of steel ladders are provided to comply with this regulation, one of these ladders shall be located within a protected enclosure, from the lower part of the space it serves to a safe position outside the space.
- Maritime Safety Committee (MSC).1/Circular (Circ.)1511 has stated that machinery spaces may include working platforms and passageways, or intermediate decks at more than one deck level. In such cases, the lower part of the space should be regarded as the lowest deck level, platform, or passageway within the space.
- The International Association of Classification Societies (IACS) Unified Interpretation (UI) SC 277 which is to be uniformly implemented by IACS Members on ships contracted for construction on or after 1 February 2016, states that machinery spaces of Category A may include working platforms and passageways, or intermediate decks at more than one deck level. In such cases, the lower part of the space shall be regarded as the lowest deck level, platform, or passageway within the space.

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## 機関室脱出用トランクに係るPSCの見解 (前スライドより続く)



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## REGION I – CURRENT PSC MATTERS ER ESCAPE TRUNK (continued)



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## 機関室脱出用トランクに係るPSCの見解 (前スライドより続く)

中華人民共和国PSCに於ける最近の拘留:

1	04109	The drill was carried out with great care, and it was observed that the crew ascended the stairs with an injured person from the bottom of the machinery space up into the escape trunk. This process took more than eight(8)minutes to begin hoisting of an injured person. Moreover, the action of the fireman was witnessed to be constrained by this fire door for hoisting. Thus the evacuation process in case of emergencies is demonstrated to be failed for escaping.	S74/CIII/R19	30
2	07120	The emergency escape trunk is not situated at the lowest level within the machinery space, despite being as low as practicable given the spatial constraints. Additionally, the equivalent Letter of compliance or certification signifies adherence to specific safety benchmarks; nevertheless, there exists a propensity to undervalue the necessity for additional acclimatization with emergency protocols and rescue exercises.		17

慎重に(脱出)訓練を実施し、乗組員が、けが人と機関区域内底部より脱出トランク内まで上がるのを観察。ケガ人の吊り上げ始めるまで8分以上を要したばかりか、防火扉が消防士たちの行動の妨げとなっていた。従って、緊急脱出手順として不合格。

限られたスペースにも拘らず、出来得る限り機関区域底部に設けるべき緊急脱出トランク(入り口)が設置されていない。更に緊急手順及び、救助訓練の必要性について触れることなく、(条約要求に適合していない)配置を認めた根拠が関連文書、もしくは証書に反映されていない。

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## REGION I – CURRENT PSC MATTERS ER ESCAPE TRUNK (continued)

Recent PSC detention in China:

1	04109	The drill was carried out with great care, and it was observed that the crew ascended the stairs with an injured person from the bottom of the machinery space up into the escape trunk. This process took more than eight(8)minutes to begin hoisting of an injured person. Moreover, the action of the fireman was witnessed to be constrained by this fire door for hoisting. Thus the evacuation process in case of emergencies is demonstrated to be failed for escaping.	S74/CIII/R19	30
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## REGION I – Region I に於ける最近のPSC 動向(前スライドより続く)

- 前スライドのPSCによる拘留は（ケガ）人を機関区域から脱出用トランク経由で救助する訓練の失敗が引き金となっている。
- （この拘留を避けるために）  
乗組員が救助訓練に精通し、ケガ人を機関区域から救い出せる事を、PSC検査官に見せる事を強く提案します。

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## REGION I – CURRENT PSC MATTERS ER ESCAPE TRUNK (continued)

- The above PSC detention may have been triggered by an unsuccessful drill to rescue a person from the in roomine room via the escape trunk.
- Crews should be familiar with these rescue drills and able to demonstrate to PSC officers their abilities to rescue an injured person from the ER.

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## REGION I – に於ける最近のPSC動向

- Marine Safety Advisory (MSA-05-24) (操船性能に対する中華人民共和国による拘留)
- MSA-15-22 (上海港に於ける推進機関の停止)

**Republic of the Marshall Islands**  
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EMAIL: maritime@register-iri.com WEBSITE: www.register-iri.com

**MARINE SAFETY ADVISORY No. 05-24**

**To:** Owners/Operators, Masters, Nautical Inspectors, Recognized Organizations

**Subject:** DETENTIONS IN CHINA DUE TO MANEUVERABILITY ISSUES

**Date:** 13 March 2024

This Marine Safety Advisory supersedes Marine Safety Advisory No. 06-23.

The Republic of the Marshall Islands Maritime Administrator (the "Administrator") continues to receive reports of ships unable to maneuver in high-density traffic or narrow waters in China. The incidents occur for various reasons as highlighted below.

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**MARINE SAFETY ADVISORY No. 15-22**

**To:** Owners/Operators, Masters, Nautical Inspectors, Recognized Organizations

**Subject:** CHINA – SHIP MACHINERY FAILURE IN SHANGHAI PORT

**Date:** 6 July 2022 (renewed 6 July 2023)

The Shanghai Maritime Safety Administration of the People's Republic of China has announced new controls to reduce machinery failure onboard ships. They require implementing safety management procedures and testing the main and auxiliary machinery before calling at Shanghai port.

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## REGION I – CURRENT PSC MATTERS

- *Detentions in China due to Maneuverability Issues* (Marine Safety Advisory (MSA)-05-24)
- *China – Ship Machinery Failure in Shanghai Port* (MSA-15-22)

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## Region I に於ける最近のPSC動向 (前スライドより続く)

- 操船性を損なう如何なる機関故障も、ほぼ確実に中華人民共和国PSCの拘留対象となる。機関故障はPSC検査の範囲を広げる事に繋がり、当地PSC検査官によるCode 30に繋がる欠陥探しが機関とは関係なく行われる。
- 前スライドに掲げた両MARINE SAFETY ADVISORYに関連する事項を周知徹底して下さい。

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## REGION I – CURRENT PSC MATTERS (continued)

- Any failure of machinery resulting in the loss of maneuverability may almost certainly result in a PSC detention in China. It will trigger an expanded PSC inspection and the PSC officers will search for any deficiency giving them a reason to issue a Code 30, even if it is not related to any machinery failure.
- It may be prudent, for crews to be aware of the above and both the relevant MSAs to avoid PSC detentions.


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## REGION I に於ける実用的対応 (最良策と注意点)

- Region I, 極東、オーストラリア、ニュージーランドでは、オーストラリア/中華人民共和国向け、事前重要項目チェックリスト、MSD-340 A-Cを発行。
- このチェックリストはよくある拘留に繋がる欠陥確認用として用意。

  
**REPUBLIC OF THE MARSHALL ISLANDS**  
**MARITIME ADMINISTRATOR**  
**CRITICAL ITEMS CHECKLIST (AUSTRALIA - CHINA)**

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 an Australian or Chinese port. Failure to follow these requirements could lead to a possible detention by the Administrator or PSC authorities. Send to: [INSPECTIONS.HK@REGISTER.IRL.COM](mailto:INSPECTIONS.HK@REGISTER.IRL.COM). Place a check mark for either “Yes,” “No,” or “N/A” (not applicable) as shown below.

VESSEL: \_\_\_\_\_ AGE: \_\_\_\_\_ BOUND FOR: \_\_\_\_\_ OFFICIAL No.: \_\_\_\_\_


Yes	No	N/A	REQUIREMENTS FOR ALL VESSELS
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No overdue Conditions of Class. Arrangements made for Class attendance / assistance at first port of call following receipt of flag acknowledgements or seafarers’ dispensations-UMS. All PSC defects have been closed by PSC MOU.
<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. Ensure OWS piping systems

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## REGION I – OPERATIONAL TEMPO

- Region I – The Far East, Australia, and New Zealand developed a *Critical Items Checklist (Australia – China)* (MSD-340 A-C)
- This checklist is a summary of common deficiencies having a high possibility of receiving a detention

  
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Yes	No	N/A	REQUIREMENTS FOR ALL VESSELS
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No overdue Conditions of Class. Arrangements made for Class attendance / assistance at first port of call following receipt of flag acknowledgements or seafarers’ dispensations-UMS. All PSC defects have been closed by PSC MOU.
<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. Ensure OWS piping systems are in accordance with ship’s approved drawings. Crew able to test and fully understand / operate all parts of the system as per instructions. Seals in place and intact. Timing is accurate.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No description of oil or hydraulic leaks on operating machinery and no “oil soaked” lagging. No fire hazards in the machinery spaces. Save-oils and tank tops clean and dry (e.g., paints, paper, wood, plastics, rags, waste, and oil.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bilge high level alarm system fully operational. No excessive bilge water in the machinery spaces. No soft patches on machinery including below bottom plate levels. No cement boxes other than Class approved.

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## REGION I に於ける実用的対応 (最良策と注意点) (前スライドより続く)

- 入港前事前点検を慎重に行う。乗組員はMSD 340 A-CとAMSA 36に記されているそれぞれの重要な(機器・システム等)チェックポイントの確認を行う。
- 凡そ80%のPSCに拠る拘留は、乗組員が(これら)チェックリストを紙面チェックで終わらせている事に起因する。



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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No overdue Conditions of Class. Arrangements made for Class attendance / assistance at first port of call following receipt of flag acknowledgements or seafarers' dispensations-UMS. All PSC defects have been closed by PSC MOU.
<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. Ensure OWS piping systems are in accordance with ship's approved drawings. Crew able to test and fully understand / operate all parts of the system as per instructions. Seals in place and intact. Timing is accurate.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No description of oil or hydraulic leaks on operating machinery and no "oil soaked" lagging. No fire hazards in the machinery spaces. Save-alls and tank tops clean and dry (e.g., paints, paper, wood, plastics, rags, waste, and oil).
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bilge high level alarm system fully operational. No excessive bilge water in the machinery spaces. No soft patches on machinery including below bottom plate levels. No cement boxes other than Class approved.

SHIP INITIAL INSPECTION CHECKLIST

Port State Control

VESSEL:

AGE:


BOUND FOR:

OFFICIAL NO.:

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## REGION I – OPERATIONAL TEMPO (BEST PRACTICES AND PITFALLS) (continued)

- Take pre-arrival checklists **seriously**. Crews need to **physically** check each item on the *Critical Items Checklist (Australia – China)* (MSD 340 A-C) and Australian Maritime Safety Authority (AMSA) 36.
- Around 80% of PSC detentions occur on vessels where crews used the pre-arrival checklists as a paper exercise.



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<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>REQUIREMENTS FOR ALL VESSELS</b>
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SHIP INITIAL INSPECTION CHECKLIST

Port State Control

VESSEL:

AGE:

BOUND FOR:

OFFICIAL NO.:

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## REGION I に於ける実用的対応 (最良策と注意点) (前スライドより続く)

- MSD 340 A-C は、AMSA及び中華人民共和国海洋安全局(MSA)が最も着目する共通のCode 30欠陥をリストしているが、極東地区、オーストラリア、及びニュージーランド全般に於いて乗組員がPSC検査について準備する手助けとなる。
- (本船が)洋上に在る間に、どんな不具合であっても弊局に報告。
- 更に、中華人民共和国、シンガポール、オーストラリア、及びニュージーランドに於いては、全ての不具合について、寄港予定先のPSC報告書式に従って報告。

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## REGION I に於ける実用的対応 (最良策と注意点) (前スライドより続く)

- MSD 340 A-C contains the most common Code 30 deficiencies noted by AMSA and the China Maritime Safety Administration (MSA). However, this checklist can assist crews to prepare for possible PSC inspections all across the Far East, Australia and New Zealand.
- While at sea before arriving at the next port, report any defects to the Administrator.
- Further, especially for China, Singapore, Australia, and New Zealand but not limited to, report all defects to the local PSC authorities in the upcoming port of call using their own reporting forms.

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## REGION I に於ける実用的対応 (最良策と注意点) (前スライドより続く)

- 入港先事務所を含む船級協会に不具合箇所を報告。
- PSCと風通しの良い信頼関係を構築。
- どんな不具合もCode 17となるが、（PSC検査に）先立って報告済み故、Code 30とはなり得ない。
- 最初の寄港地に於いて、重要機器の修理を現地船級協会検査員立ち合いの下で完了させる努力を払う。

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## REGION I – OPERATIONAL TEMPO (BEST PRACTICES AND PITFALLS) (continued)

- Report defects to Class as well and involve **local** Class at the port of arrival.
- TRANSPARENCY builds trust with PSC.
- Any reported defect may result in a Code 17, but because it has been reported it is highly unlikely to receive a Code 30.
- Exhaust all efforts to repair critical item defects at the first port of arrival including verification survey by local Class.

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## REGION I に於ける実用的対応 (最良策と注意点) (前スライドより続く)



PSC は現地に於ける技術者や部品供給者に詳しく、「当地には（修理に必要な）技術者がいない」とか「（必要な）部品を手に入れる販売店が無い」と言われた場合、PSC自らが（事実について）調査する。

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## REGION I – OPERATIONAL TEMPO (BEST PRACTICES AND PITFALLS) (continued)



PSC is very familiar with local service technicians and spare part suppliers. PSC does verify locally if they are being told “no technician available” or “no local spare parts available.”

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## 予防策 (オーストラリア)

- (弊局より) 入港前に (本船宛に) 出す注意喚起emailに、乗組員/運航者がオーストラリア入港準備の手助けとなる書類を添付。
- この添付書類は本船の現状に合わせたもので、(現状が変わる度) 常に更新が必要。
- 現在、(本船に) 送付されるemailには以下の書類が添付されます:
  - **Australia Maritime Safety Authority (AMSA) Form 36**
  - **AMSA Marine Notice 2023-04 (Pilot Transfer Arrangements)**
  - **AMSA Marine Notice 2023/04 (Testing and inspection of oil filtering equipment approved to meet Resolution MEPC.107(49))**
  - **RMI 重要項目チェックリスト、MSD 340AC (Australia-China) IRI Region I内の国々に有効**
  - 汚水 (sewage) に関する質問状

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## PREVENTIVE MEASURES

- The pre-arrival warning email contains specific attachments which can assist crews / operators in preparing for a port call in **Australia**
- The attachments are dynamic and updated if necessary
- The email currently contains:
  - Australia Maritime Safety Authority (AMSA) Form 36
  - AMSA Marine Notice 2023-04 (Pilot Transfer Arrangements)
  - AMSA Marine Notice 2023/04 (Testing and inspection of oil filtering equipment approved to meet Resolution MEPC.107(49))
  - RMI Critical Items Checklist (Australia-China) (MSD 340AC) **Can be used in all Region I countries**
  - Sewage Questionnaire

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## 予防策 （中華人民共和国）

- (弊局より) 入港前に (本船宛に) 出す注意喚起emailに、乗組員/運航者が中華人民共和国入港準備の手助けとなる書類を添付。
- この添付書類は本船の現状に合わせたもので、(現状が変わる度) 常に更新が必要。
- 現在、(本船に) 送付されるemailには以下の書類が添付されます:
  - RMI 重要項目チェックリスト、MSD 340AC (Australia-China) IRI Region I内の国々に有効
  - 汚水 (sewage) に関する質問状

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## PREVENTIVE MEASURES

- The pre-arrival warning email contains specific attachments which can assist crews / operators in preparing for a port call in **China**
- The attachments are dynamic and updated if necessary
- The email currently contains:
  - RMI Critical Items Checklist (Australia-China) (MSD 340AC) Can be used in all Region I countries
  - Sewage Questionnaire

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## 予防策(前スライドより続く)

乗組員及び操作担当者は配布された書類に従い（試験が必要とされる）個々の機器について試験を行う。



機器の故障やPSCによる厳しい（試験東の）要求が明らかに減少。

乗組員及び操作担当者が提供された書類に注意を払わない、或いは紙面による訓練とだけ受け留める。



不具合は（乗組員或いは操作担当者以外の）他者によって見出されPSCに連絡されPSCの厳しい処置に繋がる。

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## PREVENTIVE MEASURES (continued)

Crews and operators who take the supplied documents seriously and properly test each piece of equipment mentioned physically



The risk of equipment failure and severe PSC actions can be reduced significantly

Crews and operators who do not pay attention to the supplied documents or use them just as a paper exercise



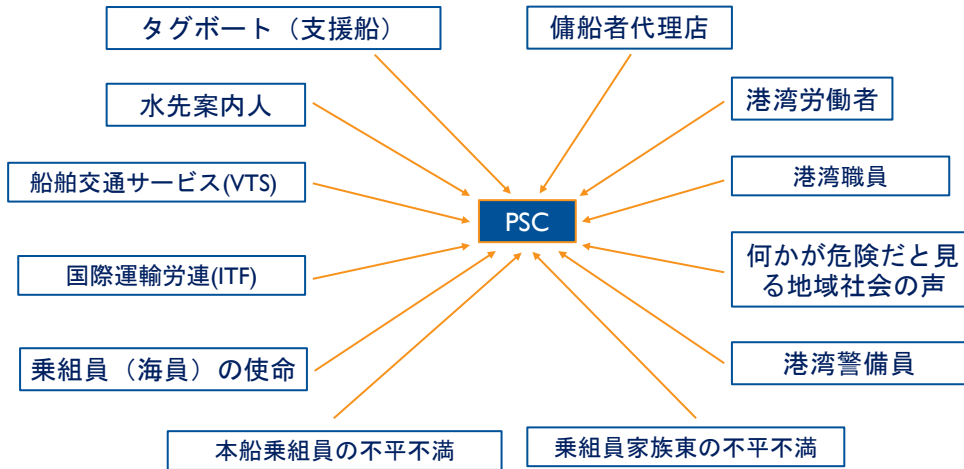
Defective equipment will be observed by others, reported to PSC and severe PSC actions will follow

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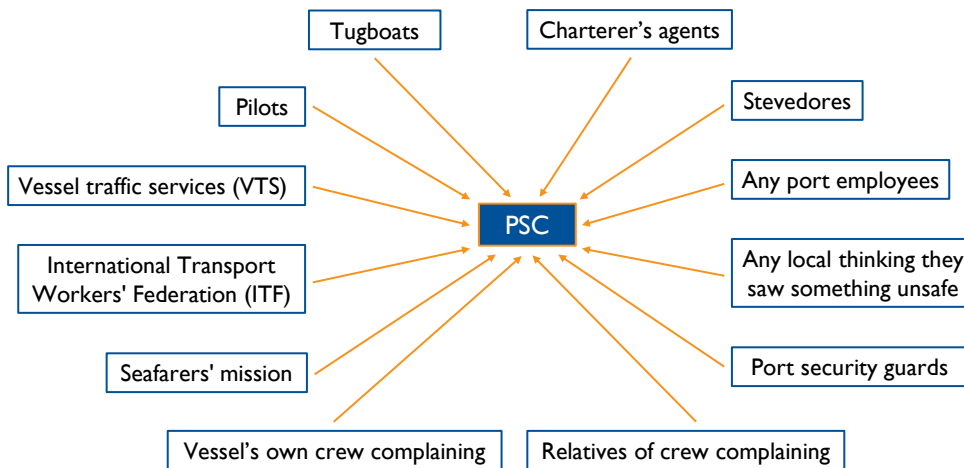
48



## PSCに向かう情報の流れ



## INFORMATION FLOW TOWARDS PSC



# PSCの介入を減らすために

**Step 1:**  
MSD 340A-C と AMSA Form 36  
を使った到着前チェックを実施

正常に作動、故障なし

PSCによる厳しい指摘が激減

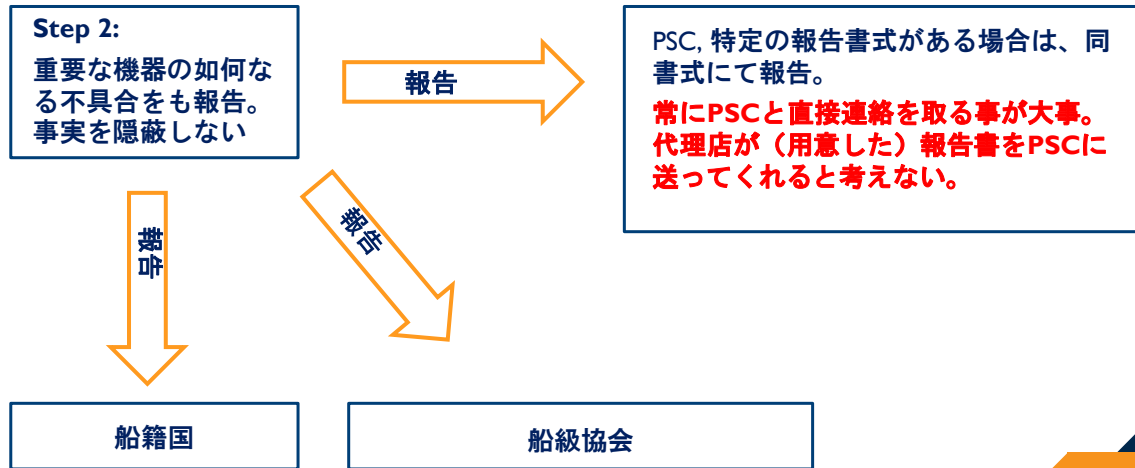
不具合あり

## STEPS TO REDUCE PSC INTER

**Step 1:**  
Follow all pre-arrival checks using  
MSD 340A-C and AMSA Form 36

The risk of severe PSC actions  
has been significantly reduced

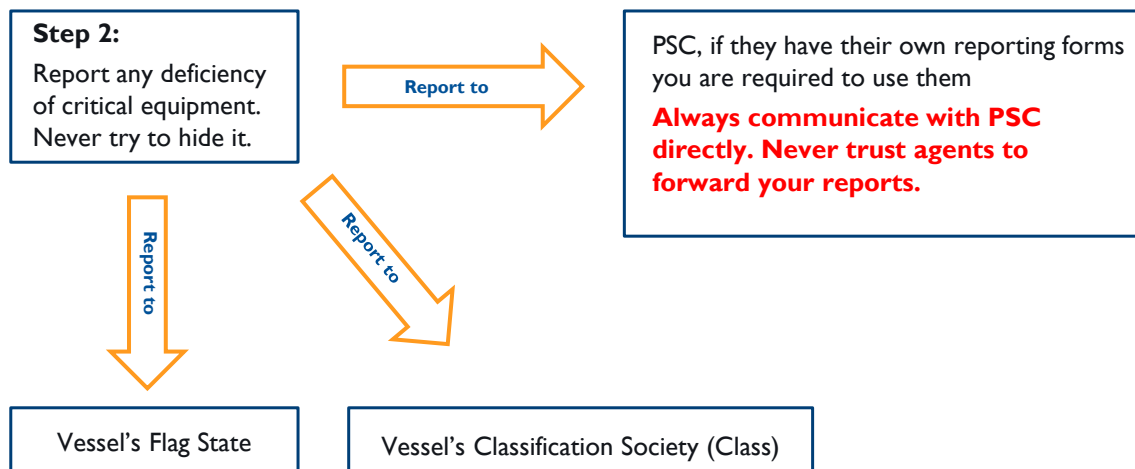
## PSCの介入を減らすために(前スライドより続く)



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## STEPS TO REDUCE PSC INTERVENTION (continued)

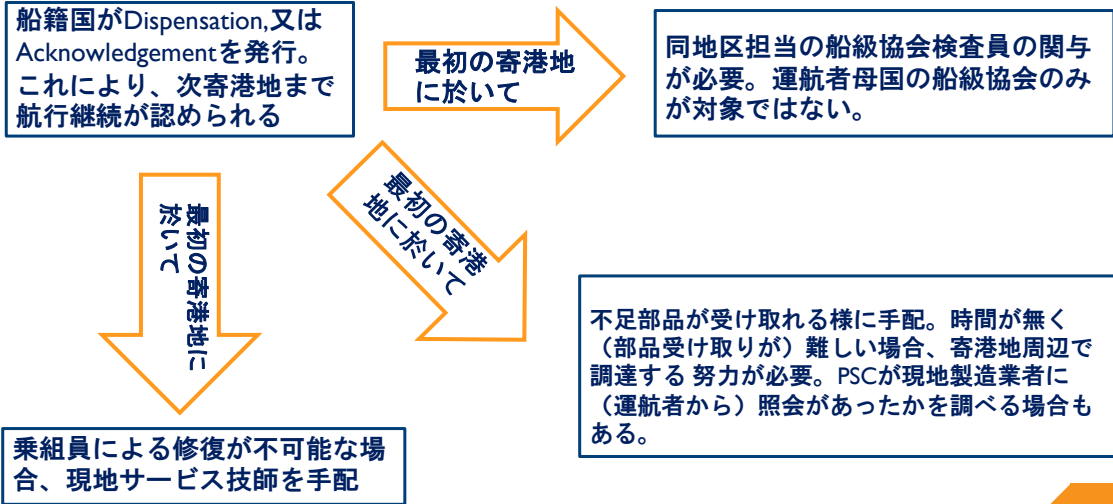


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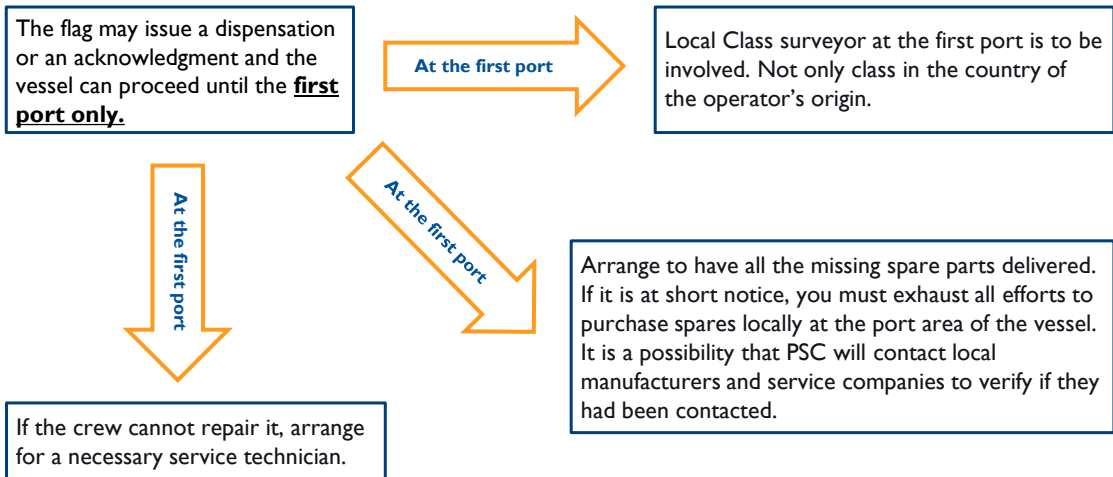
54



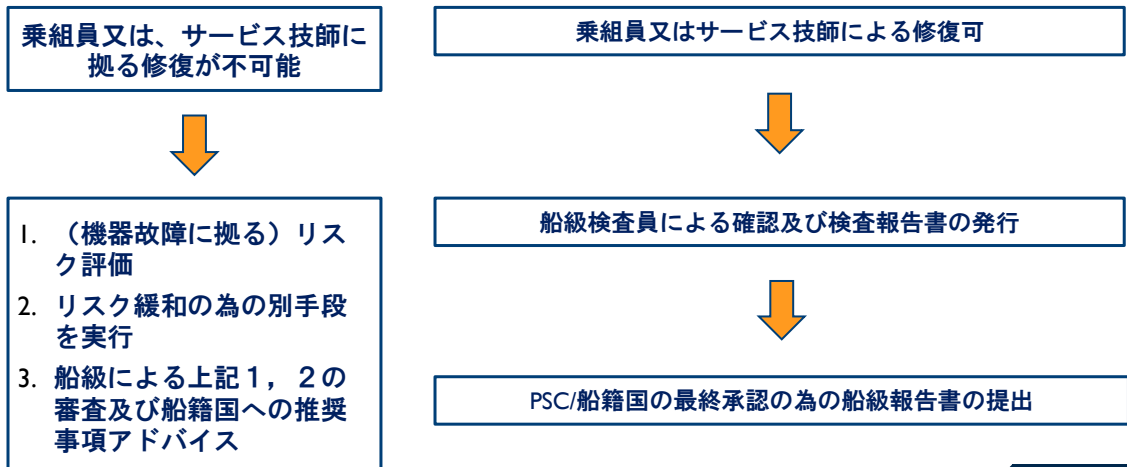
## PSCの介入を減らすために(前スライドより続く)



## PSCの介入を減らすために(続き)



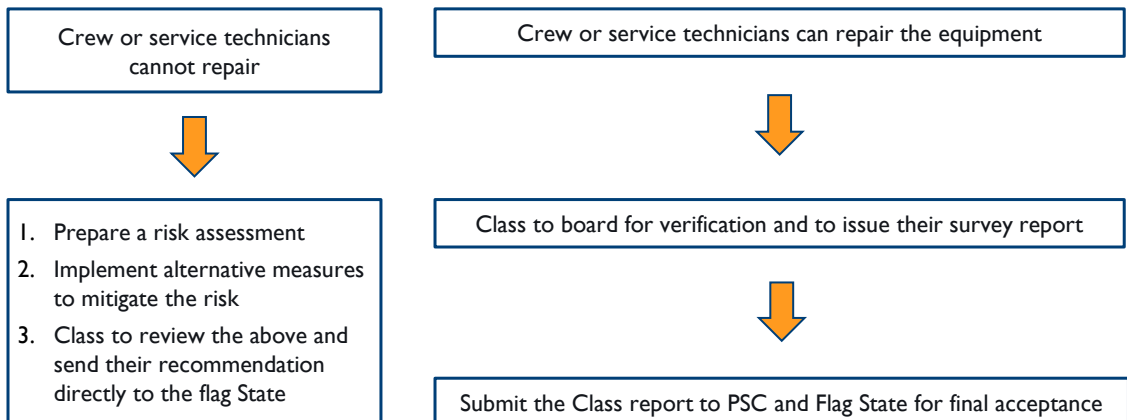
## PSCの介入を減らすために(前スライドより続く)



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## STEPS TO REDUCE PSC INTERVENTION (continued)



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## PSCの介入を減らすために(前スライドより続く)

代替法や船級協会による推奨を当該沿岸国主管庁として認めるか否かをPSCに相談



船籍国は船級協会の推奨に従い現状を認め、短期間有効な関連証書の発行を（船級協会に）許可。船籍国が同推奨等を認めない場合、更に対処法検討の要あり。



PSC及び船籍国が（不具合に対する対処法を）認めれば出港可。

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## STEPS TO REDUCE PSC INTERVENTION (continued)

Consult PSC and see if they, as the coastal State authority, accept the alternative measures and the Class recommendation.



Flag State may accept the Class recommendation and may authorize conditions and short-term certification.  
If the Flag State does not accept, further advice will be given.



If all is accepted by PSC and the Flag State, the vessel may depart!

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## PSCの介入を減らすために(前スライドより続く)

船級協会が関連証書発行後、同証書をPSCおよび、船籍国に提出。

PSC及び、船籍国の満足を得られれば、出港可能。

「修理費が次港で行う方が安い」或いは「オフハイヤーを避けるために出港させなければならない」等の理由で修理を遅らせない。

PSCは商業上の理由で修理を遅らせる事を一切認めない。

 **安全第一 !!**

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## STEPS TO REDUCE PSC INTERVENTION (continued)

After Class has issued all the relevant documentation, submit it to PSC and the Flag State.

If all is acceptable to PSC and the Flag State, the vessel may depart.

Do not postpone repairs to another port on the basis that the repair costs are cheaper elsewhere, or vessel needs to depart to avoid off-hire.

**PSC never accepts any postponement of repairs due to commercial reasons.**

 **SAFETY FIRST !!**

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## PSCの介入を減らすために(前スライドより続く)

「安全第一」を甲板室前面に掲げる理由はここにあります。



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## STEPS TO REDUCE PSC INTERVENTION (continued)

There is a reason why most vessel superstructures have the below wording stenciled



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## AMSAによるPSC検査内容

(対象船が) 不適合船と判断された場合、以下の検査を実行：

- 東京MoU (T) /インド洋MoU (I) への報告なしの国内法に拠る拘留
- 東京MoU/インド洋MoUに拠る拘留
- 限定的船舶に対する警告書の発行
- (対象になる) 会社のフリート全体に対する警告書の発行
- (対象船の) 全てのオーストラリア港に於ける活動禁止
- (対象になる) 会社のフリート船全隻のオーストラリア港に於ける活動禁止

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## ACTIONS TAKEN BY AMSA

AMSA may take the following actions if vessels are considered substandard:

- National detention which will not be reported to the Tokyo (T) Memorandum of Understanding (MoU) / Indian Ocean (I) MoU
- PSC detention in accordance with the TMOU / IMO U
- Performance warning letter for a specific vessel
- Performance warning letter for an entire fleet of a company
- Banning a vessel from operating in any Australian port
- Banning the entire fleet of a company from operating in any Australian port

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## REFUSAL OF ACCESS（入出港拒否）

### Operators issued with a letter of warning

These operators have been issued a letter of warning in relation to serious deficiencies. The compliance history of vessels and their operators, and the seriousness of deficiencies, are matters that AMSA takes into consideration under its Compliance and Enforcement Policy and Protocols and during inspection planning. AMSA may take further compliance action, including issuing directions refusing access, to Australian ports, of vessels operated by operators who do not take action to address any systemic issues that led to the deficiencies identified by AMSA.

#### Operators

Alpha Bulkers Management Inc

Transgas Shipping Lines SAC

Tidewater Offshore Operations Private Limited

ENEOS Ocean Shipmanagement Pte Ltd

#### 警告文書を発行された運航者一覧：

（下記はその運航船に）深刻な不具合が見つかった事で警告書を出された運航社のリストです。（検査）対象船やその運航社の（国際条約）遵守歴、深刻な不具合の有無を、AMSAは（対象船の）検査計画時、（国際条約）適合と施行及びその手順の為に考慮します。更に、（国際条約）適合手段としてAMSAが認める不具合を招く組織的問題に対して防止策を採らない運航社運航船舶のオーストラリア港への入港拒否を含みます。

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## REFUSAL OF ACCESS

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#### Operators

Alpha Bulkers Management Inc

Transgas Shipping Lines SAC

Tidewater Offshore Operations Private Limited

ENEOS Ocean Shipmanagement Pte Ltd

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## 入出港拒否(前スライドより続く)

https://www.amsa.gov.au/vessels-operators/port-state-control/refusal-access-list-and-letters-warning-list

Marine environment  
News & community  
About

**warning list**

Vessels refused access to Australian ports and vessels given warnings in relation to serious deficiencies.

**Refusal of access**

These vessels have been given direction by us not to enter or use an Australian port.

- Issued 2024
- Issued 2020 to 2023
- Issued 2017 to 2019
- Issued 2014 to 2016

**Issued 2024**

Marsgracht (IMO 9571507) - Issue date: 17 November 2024

Peace (IMO 9568067) - Issue date: 5 June 2024



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## REFUSAL OF ACCESS (continued)

https://www.amsa.gov.au/vessels-operators/port-state-control/refusal-access-list-and-letters-warning-list

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## 更に大事な事



運航に何が大事か？



以下に注意を払う：

- 乗組員のより良い対応
- 重要機器の整備
- 本船全般の整備・保全
- より良い傭船者を招く（本船の）好評判の維持

危険性:

- オフハイヤーを招くPSCによる拘留はオーストラリア港入港拒否のリスクあり。
- （本船の）評判の低下は傭船者の質の低下を招く

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## WHAT IS MORE IMPORTANT?



What is important for your operations?



Investing more in:

- better-performing crews
- maintenance of critical equipment
- overall maintenance of a vessel
- maintaining a good reputation which may result in better charters

Risking:

- PSC detentions resulting in off-hire risking refusal of operating in Australian ports
- loss of good reputation which may result in less attractive charters

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**THANK YOU**



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