



## CIRCULAR MCO – 007-2024

August 19<sup>th</sup>, 2024

**FROM** | MCO HEAD OFFICE – TECHNICAL DEPARTMENT  
**TO** | SURVEYORS/ MANAGERMENTS/ OWNERS/ OPERATORS  
**SUBJECT** | RO RECOMMENDATIONS CONCERNING PSC INSPECTIONS AND COMMON DETAINABLE ITEMS

Dear all,

By this means we would like to draw your attention to recommendations concerning Port State Control inspections and the some of the most common detainable deficiencies onboard vessels. MACOSNAR Corporation Technical Department would like your complete attention and understanding of the information given below in order to avoid vessel detentions and to maintain good vessel performance.

**Fire Safety and Prevention.** Commonly reported due to oil accumulation in engine room, oil-soaked lagging, excessive amounts of oil in the bilge and/or fuel leaks. Also, attention is being paid to fire detection systems and malfunctioning alarm systems.

**Safety Management Systems.** Commonly due to a lack of maintenance and/or maintenance plans, lack of inspections and lack of reporting from appointed crew members for such responsibilities. Lack of maintenance to the ship and its equipment in most cases leads to the issuance of a high number of operational and technical deficiencies providing PSC officers with enough evidence of a lack of compliance and failure of proper implementation to the SMS.

**Lifesaving Appliances.** Commonly based on failures of lifeboats and rescue boat engines as well as davits wires and controls either not functioning properly or not being maintained. Such deficiencies related to rescue boats and lifeboat engines are mainly due to their engines not being able to start.

**International Ship and Port Facilities Security.** Mainly related to a lack of controls when accessing vessels as well as unrestricted access to the bridge and other restricted areas.

**MARPOL.** Deficiencies due to failures and/or inoperable Oil filtering equipment. Also, several PSC inspections noted unapproved modifications to the vessel piping system which led to deficiencies and detentions.

The above mentioned are only the most common based on PSC inspections from the past year however other areas or items require full attention for detention prevention taking into consideration that PSC inspections are becoming more frequent and stricter on vessels as they continue to catch up on the inspections that were not able to be carried out due to the pandemic in recent years.

MACOSNAR Corporation surveyors are advised to pay attention to the following list of detainable deficiencies but will not limit to checking other areas that may be considered a concern:

- Validity of all Statutory Certificates (including annual/intermediate endorsements).
- Life-Saving Appliances (LSA) in general.
- Lifeboat falls (including renewal and reversal dates).
- Liferafts servicing (dates).
- Fire Fighting Systems & Equipment
- Emergency Fire Pumps
- Fire detention & alarm system (last service).
- Pyrotechnics (expiry date or expiration date).
- Records of weekly/monthly drills and equipment inspections (log book's entries, SMS records).
- Nautical Publications & Charts (up to date).
- Oil Record Book + Oil Filtering Equipment (MARPOL 73/78 Annex I).
- Any outstanding statutory items and/or conditions of class
- Personnel Familiarization & Responsibility (ISM Code – Section 6).
- Maintenance of the Ship and Equipment (ISM Code – Section 10).
- Working & Living Conditions

It is strongly recommended that vessel's outer paint and markings on the hull are kept in good condition at all times. Also, vessel owners and managers shall take into consideration that due to different international requirements, PSC inspections are not focused solely on technical issues, as they are evaluating vessels with a more systematic approach taking into consideration proper SMS implementation. Such approach is highly noticeable as ISM deficiencies have consistently ranked as the most common detainable deficiency over the past couple of years. Vessel owners shall keep properly maintained management systems for ISM, ISPS and MLC, such are aimed at maintaining awareness of the vessel's status and allowing prompt effective corrective actions ensuring constant compliance.

Macosnar Corporation recommends that vessel owners and managers perform root cause analysis that includes corrective and preventive actions for each PSC deficiency. Information related to such analysis shall be evaluated by DOC companies during annual audits by RO's and internal audits as well in order to confirm effectiveness of preventive and corrective actions taken.

We strongly recommend that whenever any extraordinary issue that can't be solved onboard immediately, vessel owners, operators, managers or DPA's should be informed accordingly in order to coordinate proper effective actions together with us as your RO, looking to reduce the probability of detainable deficiencies and detentions.

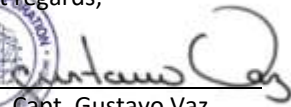
Our technical department has developed a checklist that may be used for prevention and guidance of items subject for inspections once PSC officer board the vessels. We strongly recommend vessel owners, managers and DPA's to take note on the contents of the checklist and to use it as reference in order to have a better idea of vessel status before arrival to any port of call.

Also, we would like to draw your attention to the contents of the recently issued MMC402 by the Panama Maritime Authority in which the PMA shares specific data for detentions in the Paris MOU, specifically Italian ports. A checklist, compulsory for vessels calling Italian ports, has been prepared allowing vessels to find weak items that can result in detainable items during PSC inspections by the Italian Coast Guard. Checklist is compulsory for all Panamanian flagged vessels prior arrival in Italy ports and shall be signed by vessel Captain and/or DPA, vessels not complying may be subject to administrative sanctions.

In case of detentions, please revert with PSC reports once available so we can assist accordingly into compliance and correction of the deficiencies.

Should you require any further assistance, please don't hesitate to contact us.

Best regards,

  
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Capt. Gustavo Vaz

**Technical Department**  
**MACOSNAR Corporation**