U.S. Port State Control in 2018

- More than 10,400 individual vessels
- 84 different Flags
- Over 84,000 U.S. port calls
- Over 9,000 PSC exams
- Over 8,800 ISPS exams
Detentions

• 2018 detention ratio: **1.16%**

• increased from 0.99% in 2017

  - Still comparatively low, as compared to other regions

• Top 3 causes that led to a vessel detention in 2018 are consistent over the last few years: *Firefighting Appliances/ Fire Safety, Safety Management System (SMS), and Propulsion & Auxiliary Machinery*

• Encouraging vessel owners and operators to renew their emphasis on *SMS* due consistent trend of SMS related deficiencies over the last several years

• Environmental crimes referred to DOJ for APPS violations: 14 and 8 in 2017 and 2018 respectively

• Quality review at the HQ level of every deficiency when a ship is detained
## Historical Trends

<table>
<thead>
<tr>
<th></th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Distinct Arrivals (Unique Vessel Arrivals)</td>
<td>8,925</td>
<td>9,563</td>
<td>10,290</td>
<td>10,418</td>
</tr>
<tr>
<td>3-Year Average Detention Ratio</td>
<td>1.67%</td>
<td>1.58%</td>
<td>1.39%</td>
<td>1.06%</td>
</tr>
<tr>
<td>PSC Detentions</td>
<td>202</td>
<td>98</td>
<td>91</td>
<td>105</td>
</tr>
<tr>
<td>PSC Examinations</td>
<td>9,265</td>
<td>9,390</td>
<td>9,105</td>
<td>9,025</td>
</tr>
<tr>
<td>ISPS Major Control Actions</td>
<td>11</td>
<td>8</td>
<td>6</td>
<td>8</td>
</tr>
<tr>
<td>ISPS Examinations</td>
<td>8,655</td>
<td>8,823</td>
<td>8,793</td>
<td>8,819</td>
</tr>
<tr>
<td>3-Year Average Major Control Action Ratio</td>
<td>0.11%</td>
<td>0.11%</td>
<td>0.09%</td>
<td>0.06%</td>
</tr>
</tbody>
</table>
2018 Safety Detentions By Ship Type

- Bulk Carrier: 35
- General Dry Cargo Ship: 19
- Containership: 18
- Oil/Chem Tankship: 11
- Gas Carrier: 8
- Ro-Ro Cargo Ship: 6
- Other: 5
- Passenger Ship: 3
2018 Detainable Deficiencies

- Firefighting Appliances/Fire Safety: 22%
- All Other: 21%
- Safety Management Systems: 16%
- Propulsion and Auxiliary Machinery: 12%
- Life saving Appliances: 9%
- Safety in General: 6%
- MARPOL Annex I: 5%
- Cargo: 3%
- Crew: 3%
- Certificates/Logbooks: 3%
## Targeted Flag Administrations - Safety

<table>
<thead>
<tr>
<th>7 Point Targeted List</th>
<th>2 Point Targeted List</th>
</tr>
</thead>
<tbody>
<tr>
<td>BARBADOS</td>
<td>ANTIGUA AND BARBUDA</td>
</tr>
<tr>
<td>COOK ISLANDS*</td>
<td>CYPRUS</td>
</tr>
<tr>
<td>INDIA</td>
<td>GREECE</td>
</tr>
<tr>
<td>MEXICO*</td>
<td>MALTA</td>
</tr>
<tr>
<td>PHILIPPINES</td>
<td>PANAMA</td>
</tr>
<tr>
<td>SAINT KITS AND NEVIS</td>
<td>PORTUGAL*</td>
</tr>
<tr>
<td>SAINT VINCENT AND THE GRENADINES</td>
<td></td>
</tr>
<tr>
<td>TANZANIA</td>
<td></td>
</tr>
<tr>
<td>TOGO</td>
<td></td>
</tr>
<tr>
<td>TURKEY</td>
<td></td>
</tr>
<tr>
<td>VANUATU</td>
<td></td>
</tr>
</tbody>
</table>

* New to this year’s list
<table>
<thead>
<tr>
<th>7 Point Targeted List</th>
<th>2 Point Targeted List</th>
</tr>
</thead>
<tbody>
<tr>
<td>NONE</td>
<td>NONE</td>
</tr>
</tbody>
</table>
Port State Control Appeals

- No repercussions to appeal
- Detentions reported immediately to IMO; vacated if appeal granted
- Historically, most appeals are from Ship Management, Charterers, & RO’s who don’t want to be associated with a detention due to targeting criteria.
Appeal Process

• Any directly-affected party can dispute the validity of, or their association, with a detention issued by the Coast Guard

• Parties should follow the procedures outlined in 46 CFR 1.03

• Appeals of unit actions: Process allows for three separate levels of appeal (OCMI, Districts, and Commandant)

• Appeals of Recognized Organization association with a Detention – Submit appeal directly to Commandant (CVC)
Detention Appeals for 2018

- 38 appeals were submitted to the Coast Guard
- 23 challenging the merit of the detention
  - 6 granted, 15 denied, 2 under review
- 15 contesting the association with the detentions
  - 10 granted, 5 were denied
Ballast Water Management Compliance (BWM) for 2018

- 8,140 BWM exams, +89 over 2017
- Deficiencies decreased from 219 in 2017 to 119 in 2018
- Majority of the deficiencies were, alternate management systems (AMS), Ballast Exchange, and the discharge of untreated ballast water into waters of the U.S.
- Operational control restrictions imposed on 17 vessels
- Sanctions ranged from warnings, Notice of Violations (NOV), and Administrative Civil Penalty (Class I) against several vessels for failure to implement BWM requirements
PSC Exam Approach

• PSC exams are conducted to verify regulations are being met:
  • Document check
  • Systems check
  • Structural check
  • Crew knowledge

• If discrepancies are identified, “clear grounds” may lead to conducting a “more detailed inspection”, which may involve testing (e.g., OWS)

• BWMS: Review BWM plan, reports & records \(\rightarrow\) visually examine system, ask questions & check logs
Planning for BW Contingencies

- USCG Policy Letter
- CG-CVC 18-02
- Google: USCG CVC
- Click on Policy and Guidance for list of all USCG Policy letters.
- AMS

- For inoperable systems or other known problems, report immediately to the nearest COTP and the destination COTP. Be prepared to present your plan to manage ballast water, as outlined in the ballast water management plan for the vessel. COTP may allow other methods in regulations.
QUALSHIP 21 (QS21) & E-ZERO

• The QUALSHIP 21 program ended calendar year 2018 with an enrollment of 2,213 ships.

• The E-Zero Screening began in July 2017.

• At that time, out of 1,600 plus QS21 ships only 128 ships were identified as being potential candidates and 23 ultimately received the E-Zero Designation.

• The E-Zero program ended calendar year 2018 with 54 ships enrolled.
Flag States that are preliminarily eligible for QUALSHIP 21 in 2019-2020

<table>
<thead>
<tr>
<th>Bahamas</th>
<th>Croatia*</th>
<th>Isle of Man</th>
<th>Norway*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Belgium</td>
<td>Curacao*</td>
<td>Italy*</td>
<td>Singapore</td>
</tr>
<tr>
<td>Bermuda</td>
<td>Denmark</td>
<td>Jamaica*</td>
<td>Switzerland</td>
</tr>
<tr>
<td>British Virgin Islands</td>
<td>France</td>
<td>Japan</td>
<td>Taiwan*</td>
</tr>
<tr>
<td>Canada</td>
<td>Germany</td>
<td>Liberia*</td>
<td>Thailand*</td>
</tr>
<tr>
<td>Cayman Islands</td>
<td>Gibraltar</td>
<td>Marshall Islands</td>
<td>United Kingdom</td>
</tr>
<tr>
<td>China*</td>
<td>Hong Kong</td>
<td>Netherlands</td>
<td></td>
</tr>
</tbody>
</table>

* New to the list this year

For a Flag Administration to qualify they must:

1. Have a 3-year detention ratio less than 1.00%
2. Be credited with a minimum of 10 PSC exams per year for the last 3 years
3. Submit a copy of their Self-Assessment of Flag State Performance to the IMO
4. Submit their executive summary from their Member State Audit Scheme
Thank you!

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