



Australian Government

Australian Maritime Safety Authority

Port State Control in Australia

What to expect and emerging issues!

Ship Inspection ... What to expect!

Australia prides itself on a firm but fair port State control regime. This should not be something to fear.

When an AMSA inspector attends a vessel they are required to provide the master with a letter spelling out the intent of the PSC prior to the inspection commencing.

This includes a contact that the master or operator can use if they have any concerns about the conduct of the PSC.



Ship Inspection ... What to expect!



Targeting of vessels is based on a prioritisation system.

The attending inspector should;

- Provide a clear understanding of the purpose of the inspection
- Be polite and courteous in their approach
- And provide clear communication both in their hand writing and discussion on any findings.

Ship Inspection ... What to expect!



If a ship owner wishes to determine if their vessel for fleet of vessels is performing below part there are a few simple measures to use:

- Has a vessel (or vessels) been detained twice in the last 18 months?
- Is the fleet detention rate trending above the average (currently running at about 5% as noted in the 2018 PSC report)?
- Is the fleet deficiency rate per inspection above the average (currently 1.8)?

In such cases, rest assured, AMSA will be in contact!

Ship Inspection ... What to expect!

Inspections will be conducted using a standard checklist as a guide. To ensure transparency this guide is available on the AMSA web site.

A PSC inspection should not be something to fear where:

1. There is open dialog prior to the inspection and the inspector is advised of any issues.
2. The crew are fully aware of their ship
3. The master makes use of the ability to questions any findings to ensure the is a clear understanding.



SHIP INITIAL INSPECTION CHECKLIST

Port State Control

Ship name

Port of Inspection

Date

Inspector

Signature

Ship Inspection ... Right of Appeal!

AMSA also offers an internal informal appeal process in order that detentions, and even individual deficiencies, can be re-examined by the owner/operator, flag or recognised organization (where the RO has been identified as being responsible).

The purpose of this process is to ensure that there is a cost effective right of reply from effected parties in a cost effective manner. This review is managed by the Manager, Ship Inspection and Registration.

Use of this process does not prevent any party relying on Australia's official appeal process run by the Administrative Appeals Tribunal.



Ship Inspection ... 2018 results!

Australia has seen a steady improvement in PSC outcomes since 2015 with a steady drop in the detention rate and deficiency rates in 2014 (which were 7.2% and 2.9 deficiencies per inspection respectively).

Inspections numbers fairly steady at around 3000 per year

Total deficiency numbers have dropped by over 50% since 2016 which is a marked improvement

Average deficiencies per inspection continue to drop and this the loses in over a decade.

While the detention rate is marginally higher in 2018 the number of ships detained dropped.

		2017	2018	When compared to 2017	
Arrivals	Total arrivals	28502	29094	2.0%	(an increase of 592)
	Individual ships which made those arrivals	5873	5900	0.5%	(an increase of 27)
	Ships eligible for PSC inspection	5634	5765	2.3%	(an increase of 131)
PSC inspections	Total PSC inspections	3128	2922	-6.6%	(a decrease of 206)
	Total PSC inspections - by individual ships	2800	2616	-6.6%	(a decrease of 184)
	Inspection rate of eligible ships %	49.7%	45.4%		
	Total deficiencies	7084	5320	-33.2%	(a decrease of 1764)
Deficiencies	Total detainable deficiencies	219	232	5.6%	(an increase of 13)
	Rate of deficiencies per inspection	2.3	1.8		
Detentions	Total detentions	165	161	-2.4%	(a decrease of 4)
	Detentions as a percentage of total inspections	5.28%	5.51%		

Ship Inspection ... 2019 results (to September)!

2019 has seen a continuation of the improvement in PSC outcomes seen since 2015. The detention rate and deficiency rates are still trending downwards from 5.5% and 1.8 deficiencies per inspection respectively in 2018.

55.5% of all ships had no deficiencies, even for P1 vessels 38.6% had no deficiencies

Detention rate down to 4.9%

Average deficiencies per inspection down to 1.5

Risk Group	Ship Visits	Visit Share	Eligible Ships	Initial Inspection	Inspection Rate	Defcs	Def per Insp	Detainable Def	Detained	Detention rate	Insp with no def	Insp with no def %
1	3,032	16.3 %	327	321	91.4 %	846	2.6	22	17	5.3 %	124	38.6 %
2	1,992	10.7 %	336	255	74.1 %	469	1.8	12	8	3.1 %	123	48.2 %
3	4,808	25.8 %	1,271	632	48.9 %	985	1.6	48	36	5.7 %	340	53.8 %
4	8,802	47.2 %	2,983	991	32.8 %	1,072	1.1	60	46	4.6 %	633	63.9 %
Not rated				2		3	1.5	0	0	0.0 %	1	50.0 %
Total	18,634		4,917	2,201	43.7 %	3,375	1.5	142	107	4.9 %	1221	55.5 %

Emerging issues

Looking at the PSC statistics it is obvious that things are improving, however, we should not be complacent.

General safety, issues with operational requirements and poor navigational practice remains a major area of concern.

In addition emerging technology used to propel vessels and assist in the navigation and control of vessel pose challenges to the safe operation of vessels. Crews must be trained use such technology.



Operational Requirements

Under mandatory conventions the master and crew of a vessel are to be familiar with essential shipboard procedures. This is not limited to drills but includes (but is not limited to):

- Use of systems for the navigation and operation of the vessel
- Familiarity with oil pollution prevention systems
- Understanding of essential on board procedures and use of emergency equipment

Where the port State determines the crew are not familiar with such procedures then action should be taken.

This reflects that a ship that is materially sound may be unsafe and unseaworthy if the crew are unfamiliar with its operation.

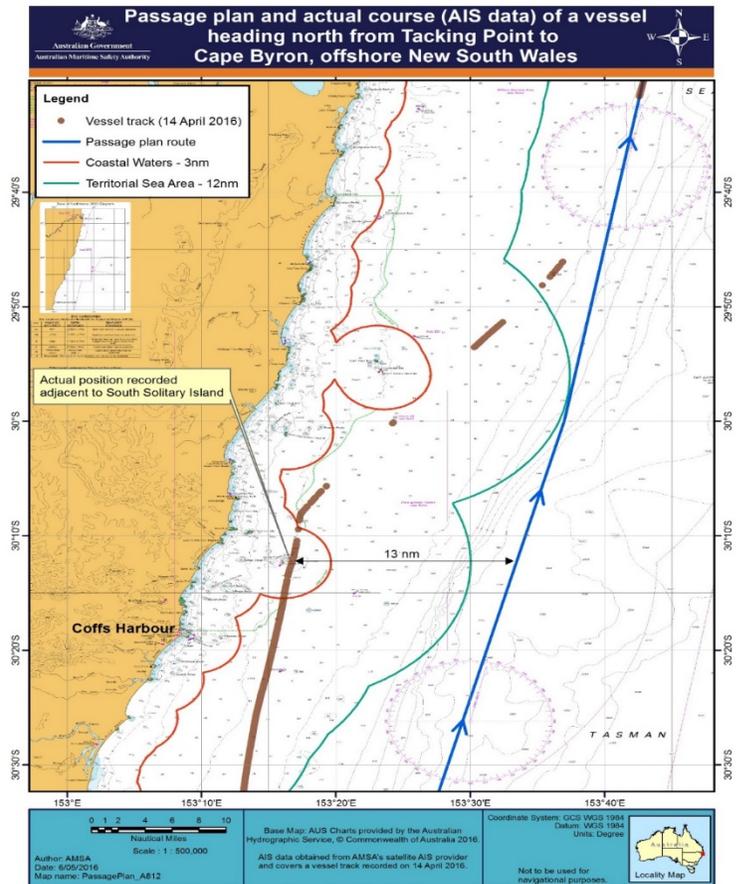
Operational Requirements

A useful example of why familiarity with procedures is important.

This vessel sailed from a southern port in Australia with the master radar set to dead reckoning. GPS positions were recorded but not checked. No verification was carried using other means As a result:

- The vessel was some 13nm off course, 5nm off the coast ... and about to hit an island.
- Because they **did not know where they were** they dumped garbage within 12nm as well.

It appears clear they were unfamiliar with an essential shipboard procedure



MARPOL Annex VI – Easy or what?

Materially compliance with Annex VI is quite simple, either burn compliant fuel, fit scrubbers or burn an alternate fuel (LNG?) how easy is that!!! The practicality is a little more complex

- Guidance on how to verify scrubber operation is still very ‘general’ in nature;
- The process of changing from non-compliant fuel to compliant fuel can be quite complex and time consuming (use of MEPC.1/Circ.878 is recommended) and the disposal of large volumes of non compliant fuel may be challenge
- Advice on how contingency arrangements and fuel oil non-availability reports are to be managed is still very general as well.

Vessels should already be changing to compliant fuel or fitting scrubbers by now

MARPOL Annex VI – PSC

In line with *2019 Guidelines for consistent implementation of the 0.50% sulphur limit under MARPOL Annex VI** AMSA PSCO's will conduct inspections in line with normal port State control practices. AMSA will rely on documentation (Bunker delivery notes [BDN], oil record book, test results etc) and ship board procedures for initial PSC inspections.

AMSA will not be sampling as a manner or practice. It is suggested that ship operators await the results of their own testing of oil fuel delivered to verify provided is compliant ... **before it is used.**

* As detailed in Resolution MEPC.320(74)



MARPOL Annex VI – Carriage of non-complaint fuel

The adoption of the changes to MARPOL accept that some vessels may have non-complaint fuel remaining in tanks after 01 January 2020.

The carriage of non-compliant fuel is permitted until March 2020 but this does not mean fuel cannot be used and PSCO's will be looking for information on what is to be done with the non-compliant fuel.

PSCO's may also verify that the non-complaint fuel is not being used through an examination of the oil record book, tanks soundings and other relevant documentation.



MARPOL Annex VI – FONAR and Contingency

At MEPC74 the guidance on contingency and the Fuel Oil Non Availability Report (FONAR) has been amended. In AMSA's view a ship submitting a FONAR should not be seen as pass to use non-compliant fuel noting ICS are providing the same advice.

- A FONAR should normally be relied upon where a vessel has not been able to source complaint fuel **despite its best efforts*** and a decision made before the ship arrives the port. Repeated use of a FONAR will attract attention.
- Contingency arrangements should only be relied upon where a vessel **unexpectedly** finds itself in a situation where it cannot comply.

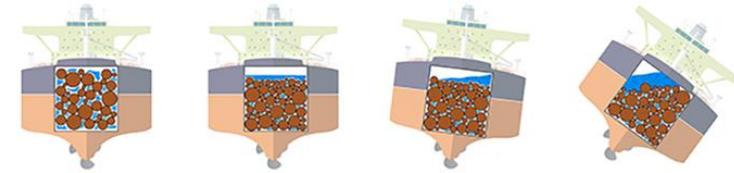
* Best efforts should include effectively planning to source fuel before arrival in the intended bunkering port. This includes determining if fuel 'should' be available.

Bulk Cargo – Cargo Liquefaction

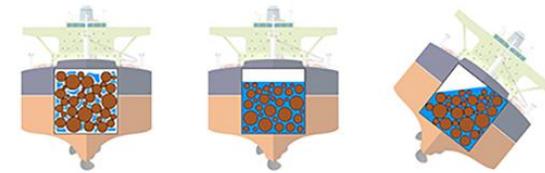
Since 2010 considerable work has been done to understand and resolve issues related to bulk cargo liquefaction. This was necessary when it was realised that cargoes once considered to be safe were actually liable to instability due to Moisture.

Effective tests are now in place for iron ore, Manganese ore, Coal and Bauxite. Nickel Ore remains a concern.

Dynamic separation



Liquefaction



Bulk Cargo – Cargo Liquefaction and dynamic separation.

<https://www.youtube.com/watch?v=zdyrQSypPBQ>



Thank you

I will deal with questions in the Q&A

