**Chapter 18**

THIRD PARTY SHIP INSPECTIONS

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# Purpose

To standardize the general process of the following third party inspections:

* Class surveys
* Port State Control inspections
* RightShip/Charterer Vetting inspections
* P&I Club inspections
* Terminal safety inspections
* Flag Administration Inspections

# Responsibilities

**Marine / Technical and Quality & Safety Manager:**

* Ensure that ships are fully prepared for any third party inspection.
* Prepare and keep continuously updated a third party inspection schedule for each ship and monitor its validity in accordance with relevant requirements.
* Track Fleet’s vetting performance, focusing on eligibility of each ship with the Charterers.
* Where necessary, bring the reported findings to the attention of Flag or Class Society.
* Review all prepared responses for closing out inspection findings before submission. Ensure responses:
  + Are cause analysed, robust, positive and comprehensive.
  + Are credible and reassure the Inspecting Body that the Company takes every step to rectify and avoid a recurrence.
  + Submitted within 15 working days form the official report receipt, or as stipulated in the official report provided.
* Monitor any required follow up actions affecting the ship’s clearance.
* In cooperation with the responsible Departments, advise timely the Inspecting Body for each finding (and, if applicable, the Flag, Class, etc.) and the actions taken to correct it.

**IT Manager:** When remote inspections are planned, ensure smooth operation of all applicable IT solutions and communications infrastructure between Inspecting Body and ship/office.

**Marine / Technical S/T and DPA:**

* Monitor all external inspections and audit reports.
* The Inspecting Body may request a remote inspection instead of a physical attendance (e.g., PSC, Class, Vetting, etc.). In this case:
  + Inform the Master and the IT Manager.
  + Ensure that all required documentation and rest requested material (photos, videos, etc.) is provided to inspector via the applicable web-based platform.
* Forward the reports to relevant Managers for guidance on the corrective and preventive actions and formulation of a response for their closure.
* Coordinate with relevant Departments for effective and timely rectification of findings.
* Initiate corrective/preventive action in close cooperation with the ship.
* Formulate a response for all findings in a format of root cause, corrective and preventive actions.
* Submit responses to the Inspecting Body, as appropriate.
* Communicate all findings to the fleet for avoiding reoccurrence.
* If needed, raise Non-Conformities through the ERP or form **NCR 002** “Non-Conformity/ Observation/Near Miss Report” as backup.
* Handle findings related to malfunctioning equipment and systems as defects, through form **M 029** “Pending Work Register”/**e-PMS**.
* Regularly check open actions’ status and provide a summary to the Management during quarterly MRC.

**MRC:**

* Review the analysis of the finding results to identify trends and potential weaknesses and/or improvements in the **UMMS**.
* Compare the internal ship’s inspection and audit results to those from third parties.
* Compare inspection and audit results within the fleet and among the Company’s inspectors/auditors.
* In case of consistent anomalies, review and improve the inspection/audit process.

**All ship’s personnel:**

* Ensure that the ship is well prepared for a third party inspection, confirming all items under their responsibility are in order prior to the inspection.
* Co-operate with Class Society, National, Local and Port Authorities and other third parties intending to conduct inspections.
* Handle the inspector with politeness and dignity.

**Master:**

* Ensure the ship is always prepared for a prospective inspection during port calls.
* Coordinate and verify pre-inspection checks have been carried out effectively. Report timely to Head Office any outstanding issue.
* Inform the Technical and Marine S/T as soon as any inspection commences, during the inspection when any findings are raised and the results of the inspection once completed.
* Arrange for a Senior Officer to meet the inspector as soon as he boards the ship, proceed with initial registration formalities as per the SSP requirements and escort him to your Office.
* Accompany the inspector at all times during the inspection. If this is not possible due to operational issues, appoint a Senior Officer from the Department under inspection for this purpose, to provide any necessary information and clarifications.
* Ensure that all efforts are made to promptly correct any finding and demonstrate same to the inspector.
* Upon completion of the inspection, carry out a **closing meeting** with the inspector and Department Heads (as applicable) to discuss any findings raised.
* Ensure findings are factual and not subject to the inspector’s interpretation.
* Request additional clarifications and rule sight, if in doubt.
* When appropriate, challenge politely the noted findings, placing particular focus on any High-Risk finding. Consult the Office if in doubt.
* If the inspector records something not accurate, discuss it with the inspector, make a comment on the deficiency sheet and request the inspector to sign it (when applicable).
* Forward the final report immediately to the Technical and Marine S/T.
* Convene an ad hoc safety meeting onboard after the inspection to discuss findings and identify what went wrong.
* Conduct an investigation on every finding and revert with your comments, following the prescribed format for root cause, corrective and preventive actions.
* Coordinate with Office the rectification of all findings the soonest possible.

**C/E:**

* Accompany the inspector during the inspection of all machinery spaces and equipment, including the Emergency Generator, Lifeboats, Steering gear etc.
* Provide all necessary information as well as requested testing of equipment.

# Managing the Inspections

**Master:** In case of a High-Risk finding, call immediately the Marine S/T.

**Officers and crew members:**

* Arrange proper boarding arrangements and security checks.
* Create a good first impression.
* Make inspector feel that the ship is manned by capable and motivated personnel.
* Ensure the ship is in good cosmetic and maintenance condition.
* Ensure that all required records are readily available and well maintained.
* Appear professionally run, with an advanced safety culture.
* Wear the appropriate PPE and offer to the inspector any required PPE, in accordance with the Company’s PPE matrix for the areas to be visited.
* Accompany the inspector directly to Master’s Office and provide him the necessary safety familiarization.
* Delegate any noted items for immediate correction as you go through the inspection, so the inspector to record as many as possible findings as ‘rectified during the inspection’.

# Surveys and Certification

## Statutory and Class Certificates and Endorsements

**Technical / Marine S/T and Master:**

* Ensure that the ship’s certification and Class records are duly updated and Certificates remain valid at all times by monitoring their due dates and the survey windows.
* Ensure efficient cooperation between the Office and ship for the proper following-up of the ship’s certification status.

**Master:**

* In cooperation with the C/E, update forms **D 006A** and **D 006B**, indicating the expiration/renewal dates of the certificates.
* Have all certificates onboard valid and endorsed, readily available for inspection. Keep the attached supplements (e.g., Safety Equipment Record, etc.) with the corresponding Certificates.
* Maintain a complete record of past Class surveys onboard.
* Send a reminder message/email to the Office for certificates due to expire at least one month before the expiration date.
* Upon receipt of a new Certificate or a new endorsement, together with C/E:
* Check the information therein for correctness and accuracy.
* Report any discrepancies immediately to the Technical Manager.
* When applicable, remove the old certificate from the folder, replace it with the new certificate and return the obsolete to the Technical S/T.
* In case of a new certificate or endorsement delivery directly to the ship, send copies of the updated documents to the Technical S/T.

**Technical / Marine S/T:**

* Monitor the survey due dates through the Class Quarterly List (Survey Status).
* Maintain and update a status list (Survey Status), indicating the certificates required for every ship.
* Keep certificate copies at the Office (hard-copy and/or electronic format), together with the attached supplements and any periodical endorsements.
* Check the correctness of the information on each ship certificate within your responsibility.
* Compare the survey status with forms **D 006A** and **D 006B** and update the latter, as necessary.
* Attach a copy of the Quarterly List to the original "Survey Status" for every ship and send the class status report onboard on monthly basis.
* Send updated “Survey Status” reports onboard within 7 days before a scheduled vetting inspection.
* In liaison with the ship’s Class and Flag, arrange for periodical surveys/endorsements at convenient ports, within the defined survey window, and before each Certificate’s expiration.
* Schedule the renewal of full-term or interim certificates within the specified dates, as laid down by the ship’s Class Society or the Flag.
* File all correspondence with the surveying Authority and cooperate with the Master and C/E on survey arrangements and schedules.
* Take the ship’s trading pattern into consideration so that the renewal of Certificates is not too far advanced or delayed.
* If the Office receives an Interim or Full-Term Certificate issued by the Class Society or Flag:
* Send the Original Certificate to the ship.
* Update the relevant Certificates database.
* Attach a copy to the corresponding ship's Survey Status List.

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|  | **C/Es** whom the Class Society authorizes to perform machinery surveys for a particular ship must complete the appropriate machinery survey report.  Arrange confirmatory surveys, as required by Class Society. |
| **CAUTION** |

**Technical Manager:**

* In cooperation with DPA, arrange for any required extensions or dispensations only if necessary due to unavoidable adverse circumstances, considering such cases as exceptional and keeping them to the minimum.
* Always follow the Flag and Class standards (as applicable) to safeguard the ship’s registration and classification status.

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|  | **DPA, Managers and Master:** In case of electronic certificates refer to the relevant instructions in **Chapter 11**. |
| **CAUTION** |

## Inspection and Certification of LSA, FFE, and other Equipment

**Technical / Marine S/T:**

* Review the LSA, FFE, and other applicable equipment Certificate database.
* Arrange surveys and service of the equipment before the expiry dates.
* In cooperation with Master, consider the ship’s schedule, operational convenience, and availability of approved service workshops at the ports of call.
* When servicing and certification are complete, coordinate with the Master to receive all new documentation and certificates. In addition, update form **D 006B**.

**Master:**

* When servicing equipment onboard, assign an Officer to attend and ensure that the job execution is correct.
* When servicing ashore, assign an Officer to:
* Be present for smooth landing of equipment, as well as returning it onboard.
* Attend at the service workshop premises, if possible.
* Ensure in case of LSA/FFE landing that minimum units remain onboard for safety.
* Upon receipt of the serviced equipment, fill out all documentation verifying the service.
* Send copies to the Office.

# PSC Inspections

**Fleet / Operations / Marine Manager, Quality & Safety Manager/DPA:**

* Ensure that the Flag Administration’s regional PSC reporting checklist is timely forwarded to the ship (see Appendix I).
* In case a ship is detained by a Port Authority, or serious findings are noted, report the matter to the Flag Administration (see Appendix I), Class, Charterers, Rightship and the authority certifying the UMMS, as appropriate.
* Submit to Flag Administration a Corrective Action Report for PSC deficiencies as soon as possible (see Appendix I).
* Advice rapidly all managed ships for sharing experience and avoiding re-occurrence.
* Ask ships to hold ad hoc safety committee if necessary.

**Master:**

* Alert the DPA in case any finding is cause for the ship to be detained.
* Notify Flag Administration of any defective and/or inoperable equipment, system prior vessel’s port call, following relevant procedure/form/checklist (see Appendix I).
* Sent to Flag Administration the Advance Notice prior entering US ports concurrently with 96-hour notification of arrival to NVMC (National Vessel Movement Center), if required (see Appendix I).
* Report to PSC authorities, prior ship’s departure, the close out of all findings with Code no 17.

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|  | ***Note*** |

*See* ***Appendix I*** *for specific reporting requirements.*

# P&I Surveys

Such surveys are carried out to determine whether a ship conforms to acceptable standards:

* For ships newly entering the association (Pre-Entry Condition survey).
* Due to a claim or a casualty.
* Whenever the Club considers that a ship presents a special risk.

**Quality & Safety Manager**, whenever an inspection/survey request is received:

* Inform Technical and Operations Departments to schedule the inspection.
* Request P&I Club to provide copy of the Inspection Checklist.
* Communicate the Inspection Checklist to Master for guidance.
* Pass the ship’s Agents contact details to the P&I surveyor.
* Receive the results of the P&I survey from the Club or the Master.
* Arrange for proper following-up of any finding until completion.
* Advise Club about the rectification of findings.

**Marine S/T:**

* Provide Master with preparatory instructions and request confirmation of readiness for inspection.
* Upon receiving the Master’s confirmation, arrange the P&I surveyor’s attendance.

# Flag Administration Inspections

Such inspections are carried out to determine whether a ship conforms to acceptable standards:

* For ships newly entering the registry (Pre-Entry Condition survey).
* Annually or at specific intervals specified by the Flag administration (based on age, ship type, inspections performance etc.).
* Following a major incident or PSC detention(s).

**Quality & Safety Manager**, whenever an inspection/survey request is received:

* Inform Marine, Technical and Operations Departments to schedule the inspection.
* Inform the Master of the forthcoming inspection and its scope.
* Receive the results of the inspection from the Flag Administration or the Master.
* Arrange for proper following-up of any finding until completion.
* Advise Flag administration about the rectification of findings.

**Marine S/T:**

* Provide Master with preparatory instructions and request confirmation of readiness for inspection.
* Upon receiving the Master’s confirmation, arrange the Flag surveyor’s attendance.

# RightShip / Charterer Vetting Inspections

This inspection takes place usually during discharging (or sometimes loading) operation.

**Quality & Safety Manager**:

* Ensure that all ships:
  + Comply with all Charterers inspections requirements.
  + Have a valid inspection as required by vessel’s age, trading pattern, and charterers requirements, as such.
* For every new delivery, arrange the necessary MOC documentation and inspection (as required).

## Handling Conditions of Class (CoC) or Equivalent Items

**Master:** Whenever surveyors impose CoC or equivalent, inform the Technical Manager and the DPA immediately about:

* The problem's nature and root cause, supported by documentation issued by the surveyor.
* Proposed means and time to rectify it.

**Technical Manager, S/T and Master:**

* Proceed immediately with the necessary rectification arrangements.
* Deal with all CoC as soon as possible and **before their due dates**.

The same applies to **all equivalent remarks** imposed by Class or other third party inspectors, which you must also address and resolve before their due dates.

* Upon completion of corrective actions and in coordination with the Master, inform the Class or the appropriate Inspecting Body to arrange for a surveyor’s visit on board, verify the correction and close the case.

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|  | **Technical S/T** in cooperation with the C/E:   * Monitor all CoC and Class Memos with a due date through form **M 029/e-PMS** as defects. * Monitor similarly as defects all equivalent remarks referring to malfunctioning equipment through form **M 029/e-PMS**. |
| **CAUTION** |

## Pre-Inspection Preparation

**Officers and crew members:** Conduct preparatory checks/actions to ensure all inspection items are in order before the inspection.

**HSQE Manager:** Whena vetting inspection is forthcoming:

* Initiate the pre-vetting process, in cooperation with the Fleet and Technical Manager.
* Coordinate with the ship’s Master to ensure:
  + The positive close out of all previous vetting inspections findings.
  + The discussion with the ship of any applicable past fleet findings.
  + The close out, where possible, of outstanding findings identified during internal/external audits and inspections.
  + That the crew carry out checks in accordance with the relevant Questionnaire for areas under their responsibility and report any noted findings.
  + The satisfactory close out of each finding before the inspection.
* Ensure that the required documents are up to date and readily available for the inspection.

1. Flag Administration Reporting Requirements

**Table 1: Pre-Arrival Reporting Requirements and Advance Notice of Arrival (ANOA)**

| **Flag** | **USA** | | **AUSTRALIA** | **CHINA** | | **EUROPE** |
| --- | --- | --- | --- | --- | --- | --- |
| **When** | **96 hours before arrival (4 days)** | | | | | |
| **Marshall Islands** | [NOA@register-iri.com](mailto:NOA@register-iri.com) both eNOA and MSD-340 | [inspections-hk@register-iri.com](mailto:inspections-hk@register-iri.com)  MSD-340 A-C | | | N/A | |