

**17. Question:** When is a risk ship type (bulk carrier, gas carrier, chemical tanker, oil tanker or passenger ships older than 12 years) which is a Low Risk Ship (LRS) due for an expanded inspection?

**Answer:** According to the Paris Memorandum text Annex 9 table 4 (copied below) a risk ship type which is a LRS is due for an expanded inspection in case of a periodic inspection after 24 month from the last inspection and in case of an additional inspection it is up to the professional judgement of the Port State Control Officer

Table 4

Category of Inspection	Ship Risk Profile	Inspection Type		
		Initial	More detailed	Expanded
Periodic	HRS	NO	NO	YES
	SRS	YES	If clear grounds are found	If the ship is of a risk ship type <sup>1</sup> and more than 12 years old
	LRS			
Additional due to overriding or unexpected factor	All	NO	YES	According to the professional judgement of the PSCO if HRS or SRS/LRS of a risk ship type <sup>1</sup> and more than 12 years old

<sup>1</sup> risk ship types are chemical tanker, gas carrier, oil tanker, bulk carrier and passenger ship

**16. Question:** Does a vessel have to report ETA72/24 to all ports when calling more than one port consecutively in Paris MoU or is the report to be made only for first port in Paris MoU.

**Answer:** A vessel have to report 24 hours (24 ETA) before arriving at a port or anchorage of the Paris MoU region or before leaving the previous port or anchorage if the voyage is expected to take less than 24 hours. Thus, this pre-arrival notification has to be reported to all ports in the Paris MoU region the vessel calls.

The 72 hours reporting obligation (72 ETA) is only required when the vessel is due to an expanded inspection. Ships due to an expanded inspection are High Risk Ships (HRS) and Risk Ship Type (Oil Tanker, Bulk Carrier, Passenger Ship, Gas Carrier and Chemical Tanker which are more than 12 years old). The operator, agent or master of a vessel shall notify its arrival at least 72 hours before the expected time of arrival or before leaving the previous port or anchorage if the voyage is expected to take less than 72 hours. Once the vessel has been through the expanded inspection, the 72 ETA is of course not longer an obligation.

Please see the leaflet on reporting obligations to be found on the Paris MoU webpage (<http://www.parismou.org/upload/pdf/PSC%20Reporting%20Obligations.pdf>)

**15. Question:** What will be the Ship Risk Profile and the Priority of a new building not inspected in the Paris MoU region ?

**Answer:** The Ship Risk Profile of a new building not inspected in the Paris MoU region will be either Standard Risk or High Risk depending on the generic Factors (Flag, RO, Company performance and ship type). A new building can never be Low Risk since one of the criteria for Low Risk Ships (inspected within the last 36 months) is not fulfilled. New buildings will be Priority I (PI) and subject for inspection when arriving to the Paris MoU region for the first time.

**14. Question:** Are inspections included in the calculation of the company performance if a ship is changing company before 01.01.2011?

**Answer:** For the calculation of the company performance all inspections from the 17.06.2009 will be taken into account. Only after 36 months from the date of inspection this inspection will not be taken into account for the calculation of the company performance.

**13. Question:** What are the criteria for the calculation of the company performance and how are these taken into account?

**Answer:** The Company Performance is calculated as follows:

Company performance takes account of the detention and deficiency history of all ships in a company's fleet while that company was the ISM company for the ship. Companies are ranked as having a "very low", low, medium or high" performance. The calculation is made daily on the basis of a running 36-month period. There is no lower limit for the number of inspections needed to qualify except a company with no inspections in the last 36 months will be given a "medium performance".

The formula consists of two elements, the deficiency index and the detention index.

### **Deficiency Index**

When counting deficiencies each ISM related deficiency is weighted at 5 points. Other deficiencies are valued at 1 point.

The Deficiency Index is the ratio of the total points of all deficiencies of all ships in a company's fleet to the number of inspections of all ships in the company's fleet within the last 36 months.

This ratio is compared with the average for all ships inspected in the Paris MoU over the last 3 calendar years to determine whether the index is average, above average or below average as follows:

<b>deficiency index</b>	<b>Deficiency points per inspection</b>
above average	> 2 above PMoU average
Average	PMoU average $\pm$ 2
below average	> 2 below PMoU average

### **Detention Index**

The Detention Index is the ratio of the number of detentions all ships in a company's fleet to the number of inspections of all the ships in the company's fleet within the last 36 months.

This ratio is compared with the average for all ships inspected in the Paris MoU over the last 3 calendar years to determine whether the index is average, above average or below average as follows.

<b>detention index</b>	<b>Detention rate</b>
above average	> 2 above PMoU average
average	PMoU average $\pm$ 2%
below average	> 2 below PMoU average

If a Refusal of Access Order (banning) is issued within the last 36 months to any ship in the fleet the Detention Index of the company is automatically "above average" irrespective of all other inspection results.

### **Company Performance Matrix**

Using the matrix in Table 2 below the combination of deficiency and detention indices determines the performance level.

**Table 2: Company Performance Matrix**

Detention Index	Deficiency Index	Company Performance
Above average	Above average	Very Low
Above average	Average	Low
Above average	Below average	
Average	Above average	
Below average	Above average	
Average	Average	Medium
Average	Below average	
Below average	Average	
Below average	Below average	High

## NIR: Determination of Company Performance

- 1<sup>st</sup>** Calculate Company Ratios
- 2<sup>nd</sup>** Calculate Average Ratios
- 3<sup>rd</sup>** Determine Company Indexes
- 4<sup>th</sup>** Get Company Performance from Matrix

Company Performance is recalculated on a daily basis

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## NIR: Company Performance formula

- **Deficiency Ratio**

$$\text{Deficiency Ratio} = \frac{\text{No. of deficiencies(*) in ALL inspections in ALL Ships}}{\text{No. of inspections in ALL Ships}} \quad (\text{in last 36 months})$$

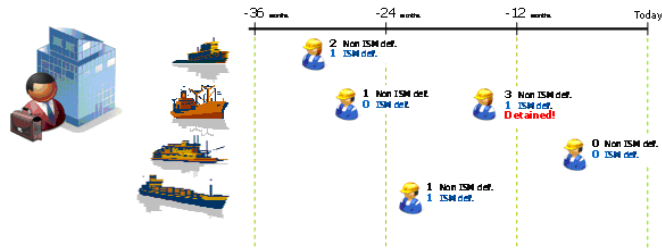
(\*) each ISM deficiency counts as 5.

- **Detention Ratio**

$$\text{Detention Ratio} = \frac{\text{No. of detentions of ALL Ships}}{\text{No. of inspections in ALL Ships}} \quad (\text{in last 36 months})$$

2

# NIR: 1<sup>st</sup> Calculate Company Ratios

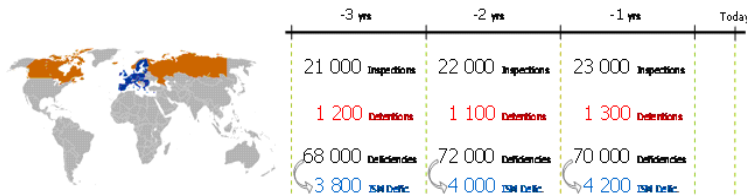


$$\text{Deficiency Ratio} = \frac{7 \text{ Non ISM def.} + (3 \text{ ISM def.} \times 5)}{5 \text{ Inspections}} = 4.4 \text{ points/insp.}$$

$$\text{Detention Ratio} = \frac{1 \text{ Detention}}{5 \text{ Inspections}} = 20 \% \text{ det./insp.}$$

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# NIR: 2<sup>nd</sup> Calculate Average Ratios



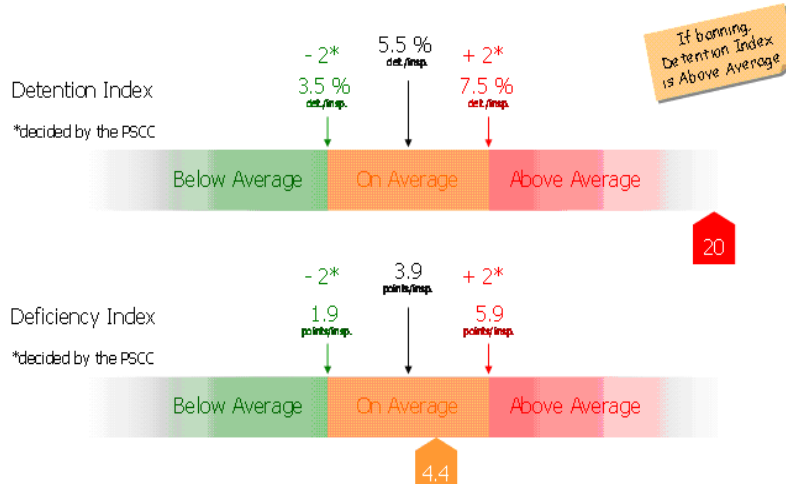
Average : 22 000 Inspections, 1 200 Detentions, 70 000 Deficiencies from which 4 000 are ISM related

$$\text{Average Deficiency Ratio} = \frac{66 000 \text{ Non ISM def.} + (4 000 \text{ ISM def.} \times 5)}{22 000 \text{ Inspections}} \sim 3.9 \text{ points/insp.}$$

$$\text{Average Detention Ratio} = \frac{1 200 \text{ detention}}{22 000 \text{ inspections}} \sim 5.5 \% \text{ det./insp.}$$

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# NIR: 3<sup>rd</sup> Determine Company Indexes



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# NIR: 4<sup>th</sup> Get Company Performance from Matrix

Detention Index	Deficiency Index	Company Performance
Above Average	Above Average	Very Low
Above Average	Average	Low
Above Average	Below Average	
Average	Above Average	
Below Average	Above Average	Medium
Average	Average	
Average	Below Average	
Below Average	Average	High
Below Average	Below Average	

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If no Inspections, Company (incl. new, or name changed), then Performance is Medium

**12. Question:** Will the PSC history of ship stay with the ship in case it is changing the company?

**Answer:** The PSC history of a ship will **not** be deleted in case it is changing the company. For the calculation of the historic parameters “Number of deficiencies recorded in each inspection within previous 36 months” and “Number of Detention within previous 36 months” a change of company has no effect.

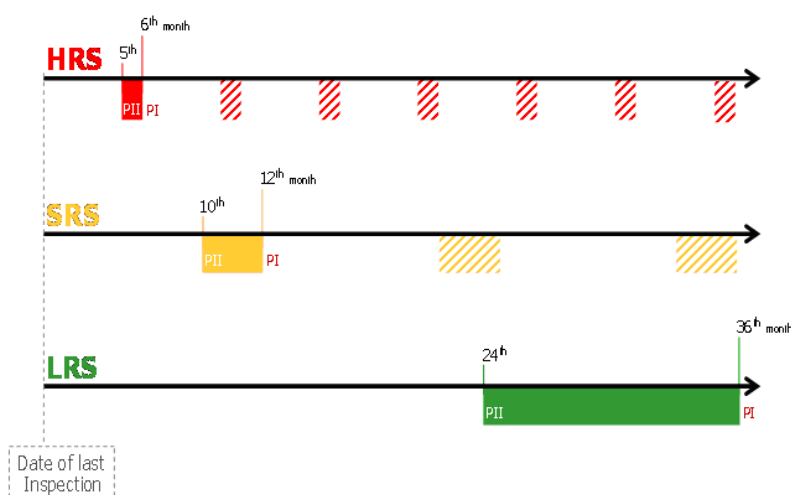
**11. Question** Is there a standard code for categorizing deficiencies as ISM deficiencies?

**Answer:** From 01 January 2011 pn PSC inspection forms ISM related deficiencies are coded with numbers from 151xx

**10. Question:** Definition of the term “as from the 5<sup>th</sup> month” in case of a HRS, does the time frame open after 5 months elapsed since the last inspection or at the beginning of the 5<sup>th</sup> months and analogue for SRS (10 month) and LRS (24 month)?

**Answer:** The time frame in case of a HRS open after 5 months, elapsed, in case of a SRS after 10 months and in case of LRS after 24 months.

## NIR: SRP Inspection Window



**9. Question:** What are the main differences between Priority I and Priority II?

**Answer:** Each ship will be attributed with a ship risk profile. Depending on the time since the last inspection in combination with the ship risk profile applicable, the ship will be prioritized for inspection. A Priority II ship may be inspected; a Priority I must be inspected. These are no obligations for the ship but for the PMoU member where the ship calls. Priority I status may also be invoked if there is an event triggering an overriding inspection such as when the ship has been reported to be maneuvering erratically. It should be noted that the selection scheme does not have prejudice over the prerogative of a State to inspect any foreign ship at any time.

**8. Question:** How do the risk factors affect Priority I and II?

**Answer:** The risk factors affect on how often a ship will be periodically inspected. Periodic inspections are determined by a time window. Each ship will be classified as High Risk Ships (HRS), Standard Risk Ships (SRS) or Low Risk Ships (LRS) using details of inspections in the PMoU area in the last 3 years. The time window for periodic inspections is set as follows:

- HRS: between 5-6 months after the last inspection in the PMoU region;
- SRS: between 10-12 months after the last inspection in the PMoU region;
- LRS: between 24-36 months after the last inspection in the PMoU region.

If the time window has passed a ship becomes Priority I. Furthermore Priority I status may also be invoked if there is an event triggering an additional inspection such as when the ship has been reported to be manoeuvring erratically. It should be noted that the selection scheme does not have prejudice over the rights of Port States to inspect foreign flagged ships in their ports at any time.

**7. Question:** What are the reporting obligations for ships due for an expanded inspection?

**Answer:** Ships due to an expanded inspection have to report 72 hours (72 ETA) before arriving to a port or anchorage of the Paris MoU region or before leaving the previous port or anchorage if the voyage is expected to take fewer than 72 hours following information:

- (a) ship identification (mandatory IMO number and additional name, call sign and/or MMSI number)
- (b) port of destination;
- (c) estimated time of arrival (ETA);
- (d) estimated time of departure (ETD);
- (e) planned duration of the call;
- (f) for tankers configuration: single hull, single hull with SBT, double hull; condition of the cargo and ballast tanks: full, empty, inerted volume and nature of cargo
- (g) planned operations at the port or anchorage of destination (loading, unloading, other)
- (h) planned statutory survey inspections and substantial maintenance and repair work to be carried out whilst in the port of destination date of last expanded inspection in the Paris MoU region.

**6. Question:** Have High Risk Ships or a ship being subject to an expanded inspection by ship type and age to send the 72 hour's message only if a vessel is due for the inspection as the time frame is open according to the risk factor, or if such message has to be sent prior to any arrival in a European port all year round. One flag state already informed their ship owners that this message has to be entered preferably into the SafeSeaNet data system. According to our knowledge this system, however, will not be open for entries to the public. The leaflet also asks a Master or operator to send an ETA message to the port authorities 24 hours in advance. The question is whether any vessel has to announce its arrival 24 hours in advance for PSC purposes during the whole year round or only if the time frame according to its present risk category is open for an inspection.

**Answer:** Regarding the 72hr pre-arrival question: Each ship eligible for an Expanded inspection shall report its arrival at least three days in advance and shall provide the necessary details. Depending on its Risk Profile and/or ship type and age, the ship has to report from the 5th, 10th or 24th month. Information shall be provided by the ship or its representative to the competent authorities whom then shall provide the information to SSN. It is not necessary to

report to the PSC organisation separately. Regarding the 24hr pre-arrival notification: The 24 hour requirement is a general requirement. It will be used for PSC purposes but the requirement is to report at all times.

**5. Question:** Pre-arrival notifications:

- a) To whom the 72 hours in advance notification has to be sent?
- b) To whom the 24 hours in advance notification has to be sent?
- c) Is there a list of the port authorities to whom the notifications have to be sent?

**Answer:** The appointed authority assuming the tasks of Port Authorities may vary between States and even within States. Information on local arrangements is therefore essential. The final destination of the 72 and 24 hour pre-arrival notifications is the port authority of the respective port. The master could choose to send the information directly, or through the agent, company or any other entity considered appropriate. The contact details of the port authorities to whom pre-arrival notifications have to be sent can be found in the respective Nautical Publications, Almanacs, port guides, webpages and through local agents. The means of communicating the pre-arrival notification depends on the local situation. It is not expected that as a consequence of the additional notifications the way to communicate will change from current practices.

**4. Question:** What kind of deficiencies would be categorised as a Non ISM deficiency ?

**Answer:** A non-ISM deficiency is any deficiency not directly related to the provisions of the ISM Code. Such deficiencies could be related, but are not limited to:

- technical, operational or environmental requirements;
- certification and documentation;
- working and living conditions on board.

The convention reference for such deficiency does not refer to the ISM Code.

**3. Question:** According to the brochure from Paris MoU all ships have to report at least 24 h in advance to any arrival, for certain ships older than 12 years even 72 hours before arrival. Ships of the company are engaged in mainly short sea ferry traffic with a high number of departures and arrivals for each of our ferries every day. Almost all ships are passenger ships older than 12 years which means that the ships are targeted to be subject to an expanded inspection which again means that they have to report at least 72 hours in advance. This can obviously not be practiced for above mentioned reasons.

**Answer: In general:** Regarding the 72hr pre-arrival question: Each ship eligible for an Expanded inspection shall report its arrival at least three days in advance and shall provide the necessary details. Depending on its Risk Profile and/or ship type and age, the ship has to report from the 5th, 10th or 24th month. Regarding the 24hr pre-arrival notification: The 24 hour requirement is a general requirement. **Short voyages:** In case voyages are expected to take less than three days the 72 hour reporting obligation is replaced by an obligation to report "before leaving the previous port or anchorage". Vessels in a regular service [as defined in Directive 2002/59] may be completely exempted from sending a 24 hour pre-arrival notification pending agreement between the company and the State(s) involved

**2. Question:** In case a Recognized Organisation is not listed in the table Recognized Organization Performance how will this affect the Ship Risk Profile (SRP)?

**Answer:** Ships with a Recognized Organisation which is not listed in the table Recognized Organization Performance can not be a Low Risk Ship (LRS). The following criteria are not fulfilled:

- Recognized Organization to be high performance, and
- recognized by one or more Paris MoU members.

Furthermore, for the calculation of the High Risk Ship (HRS) profile, the ship will not gain any points for the criterion Recognized Organization performance as the RO's does not appear on the Paris MoU list.

**1. Question: Will it be possible to see on the public website of the Paris MoU a list of States which have undergone the Voluntary IMO Member State Audit Scheme (VIMSAS)?**

**Answer:** There will be no information on the Paris MoU public website to indicate which State has undergone the VIMSAS. This information is distributed by an internal IMO Circular which is not publicly available. Individual States may decide to make the information publicly available, but there is no requirement to do so. States are invited to inform the Paris MoU Secretariat as soon as an audit has been concluded. However, according to paragraph 12 in Annex 7 of the amended memorandum, the Paris MoU Secretariat will maintain on the Paris MoU public website an up-to-date list of flag States which meet the flag criteria for a low risk ship. Accordingly flag States figuring on this list will all have been through the voluntary IMO Audit and will be a white listed flag.