KISH P&I CLUB

Recommendations for the amendment on Vessel Inspection Questionnaire (VIQ) 2014

The ensuing amendments are recommended to be applied to the existing document. Sections referred to are identical to those of the Vessel Inspection Questionnaire itself:

2.1 List of the statutory certificates that are required to be examined are not complete at all. A reference to the International Maritime Organization (IMO) MSC.1/Circ. 1462 (list of certificates and documents to be carried on board ships, 2013) may be appropriate. It would be wise to substitute the words "Annual" and "Intermediate" with the term "Mandatory surveys" as there are certificates that are subject to other types of surveys, that is to say, Periodical surveys. For types of surveys applicable, reference may be had to A.1104(29) entitled survey guidelines under the harmonized system of survey and certification (HSSC), applicable to those member states even though not a party to protocol of 1988 to the international convention for the Safety of Life at Sea (SOLAS), 1974, as amended, and the international convention on Load Lines (LL),1966, as amended, by A.883(21).

Referring to MSC.160(78) company and registered owner identification number is required to be inserted only on (Interim) Document of compliance (DOC), Continuous Synopsis Record (CSR), (Interim) Safety Management Certificate (SMC) and (Interim) International Ship Security Certificate (ISSC) and not on all of the incomplete list of certificates in this section.

2.1.2 For a better understanding of ship's masters and Company Security Officers (CSO) on proper procedures to be adopted for maintenance and format of the Continuous Synopsis Record (CSR) reference may be added to MSC.198(80) and A.959(23).

2.1.3 Through Section 13.4 of the International Management Code for the Safe Operation of Ships and for Pollution Prevention (ISM Code), 2010, as amended, to maintain validity of the Document of Compliance (DOC) an annual audit should be carried out by the administration or a recognized organization (RO) within 3 months of each anniversary date of the document and the anniversary date is defined in Section 1.1.11 as the day and month of each year that corresponds with the date of expiry of the document and not the date of issue.

2.1.10 Reference to A.890(21) may be substituted with the A.1047(27), principles of minimum safe manning, which revokes both A.890(21) and A.955(23).

2.9 Instead of A.744(18) reference is to be had to the International Code on the Enhanced Programme of Inspections during surveys of Bulk Carriers and Oil tankers, 2011 (2011 ESP Code), effective as of 1st January 2014, adopted by A.1049(27) and as made mandatory by SOLAS XI-1/2.

3.1 Reference to A.890(21) may be substituted with the A.1047(27), principles of minimum safe manning, which revokes both A.890(21) and A.955(23).

3.2 Exceptions to the rest hours introduced by the Manila amendments to Section A-VIII/1 paragraph 9 of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW), 1978, as amended, are not included, namely, that the 10 hours of rest in any 24 hours may be divided into no more than 3 periods one of which shall be at least 6 hours in length and none of the other two shall be less than 1 hour in length, interval between two consecutive rest periods is not to exceed 14 hours and this exception shall be used no more than two 24 hours during any 7-day period. 77 hours of rest in any 7-day period may be reduced to 70 hours provided that the exception does not extend beyond 2 consecutive weeks and the intervals between two periods of exceptions on board shall not be less than twice the duration of the exception.

3.10 It is required that all watchkeeping officers must be in possession of certificate of proficiency in advanced training for oil, chemical and liquefied gas tanker cargo operations on or after 1st January 2017. There are possible exceptions in that there might be whatchkeeping officers that have newly joined a tank ship and are having the basic certificate of proficiency only, for, as required by the Annex to the STCW convention 1978, as amended, Regulations V/1-1 and V/1-2, to apply for the advanced certificate the candidate must have 3 months or in special cases 1 month of approved sea service on the particular type of tanker in addition to successful completion of the advanced course. Further, two non-technical words are used in the last paragraph namely "Junior officers" and "Endorsement" as the former is not defined by the STCW convention,1978, and the latter lacks the indication as to whether it refers to endorsement attesting the recognition of a certificate or endorsement attesting the issue of a certificate which makes the sentence ambiguous.

4.5 SOLAS V/26.5 refers only to testing of steering gear and its components and not to whole of the bridge equipment.

4.9 References to STCW Code Part A should be corrected to A-VIII/4-1 15, A-VIII/4-1 16 and A-VIII/4-1 32.

4.10.40 Automatic Identification System (AIS) shall be tested annually by an approved firm and the test certificate shall be retained on board for verification purposes. Reference should be given to SOLAS V/18.9 and MSC.1/Circ.1252.

4.12 There is an absence of reference to SOLAS V/19.1.2.4 added by MSC.350(92) for the installation requirement of a Bridge Navigational Watch Alarm System (BNWAS) on board ships constructed before 1st July 2002. On the other hand an additional note is to be inserted providing reference to MSC.1/Circ.1474 prohibiting use of the auto-mode on BNWAS after the sentence stating that "the BNWAS shall be in operation whenever the ship is underway at sea".

4.13 It seems that lines 12 and 13 are to be replaced with each other.

4.22 It would be appropriate to make a reference to MSC.1/Circ.1496 for guidance on how to complete sections 2.1 and 2.2 of the record of construction and equipment to the cargo ship safety equipment certificate (forms E, P and C) concerning paper or Electronic Chart Display and Information System (ECDIS) nautical charts and for the owners/managers to ascertain which form of charts are to be utilized as primary means of navigation on board their managed ships.

5.11 In the first paragraph reference to 2.2 is to be substituted with 2.3.

5.26 Referring to SOLAS II-2/5.7.3.1 added by MSC.291(87), now, oil tankers of 20,000 tonnes deadweight and above, constructed on or after 1 January 2012, shall be provided with a fixed hydrocarbon gas detection system (FHGDS) complying with the Fire Safety Systems Code (FSS code new chapter 16) for measuring hydrocarbon gas concentrations in all ballast tanks and void spaces of double-hull and double-bottom spaces adjacent to the cargo tanks, including the forepeak tank and any other tanks and spaces under the bulkhead deck adjacent to cargo tanks. Oil tankers provided with constant operative inerting systems for such spaces need not be equipped with fixed hydrocarbon gas detection equipment. Guidelines for design, construction and testing of fixed hydrocarbon gas detection systems (FHGDS) can be found in MSC.1/Circ.1370.

5.70 SOLAS V/23.3.2 & V/23.6 are amended by MSC.308(88) since of 1st July 2012. Reference to mechanical pilot hoists is removed in the former and in the latter use of the mechanical pilot hoists is prohibited. Useful references may be given in this section to MSC.1/Circ.1331 for the construction, installation, testing and maintenance of means of embarkation and disembarkation from ships, A.1045(27) on pilot transfer arrangements and SOLAS II-1/3-9 for renewal of the accommodation ladder wires at the same intervals as the life boat wires contained in SOLAS III/20.4 for the guidance of the ship's crew and shipping companies.

8.5 A new sub-paragraph 6 is added to regulation 28 of Annex I of the International convention for the prevention of pollution from ships (MARPOL) by MEPC.248(66) which requires that, with few exemptions, all oil tankers constructed on or after 1st January 2016 to be fitted with a stability instrument, capable of verifying compliance with intact and damage stability requirements approved by the Administration. Oil tankers constructed before 1 January 2016 shall comply with this regulation at the first scheduled renewal IOPP (International Oil Pollution Prevention) survey of the ship after 1 January 2016 but not later than 1 January 2021. For the purposes of control, the Administration shall issue a document of approval for the stability instrument.

8.9 A reference may appropriately be made to section 6.1 of Part 2 of the guidelines for verification of damage stability for tankers (MSC.1/Circ.1461) stipulating that verification of compliance with damage stability requirements should be documented in accordance with the company's operating procedures and the company's safety management system. This should include a method of retaining manual calculations and/or stability instrument printouts used to verify compliance, so that this information can be

provided to third parties, such as company auditors, surveyors or port State control inspectors. It is recommended that records are retained on board for a minimum of three years to ensure they are available at the next Safety Management Certificate (SMC) audit.

8.51 Section 9 of the crude oil washing (COW) manual had been amended since 1st July 1999 by MEPC.81(43). Instead of list of crude oils that are unsuitable for crude oil washing a set of criteria are given to determine the suitability of a crude oil for crude oil washing. Important guidelines could be obtained from the document, particularly, concerning heated cargoes and determination of cloud point temperature by formula and bondi-test procedure.

10.14 A new paragraph 10.4 is added to SOLAS II-2/4.10.10 by MSC.338(91) stating that for ships constructed on or after 1 July 2014, a minimum of two two-way portable radiotelephone apparatus for each fire party for fire-fighter's communication shall be carried on board. Those two-way portable radiotelephone apparatus shall be of an explosion-proof type or intrinsically safe. Ships constructed before 1 July 2014 shall comply with the requirements of this paragraph not later than the first survey after 1 July 2018.

10.15 References to A.890(19) are to be corrected to A.809(19). In addition, A.809(19) applies to survival craft portable two-way VHF radiotelephone apparatus installed before 1st July 2005. For those apparatus installed on or after 1st July 2005 reference shall be had to MSC.149(77).

11.7 A reference may also be made to Code on Alerts and Indicators (A.1021(26)) applicable to ships constructed on or after 18th January 2010.

11.16 A reference should made to section 8.3 of the Code on Alerts and Indicators (A.1021(26)) applicable to ships constructed on or after 18th January 2010 which states that in addition to manual operation from the machinery space, the engineers' alarm on ships with periodically unattended machinery spaces should operate when the machinery alarm is not acknowledged in the machinery spaces or control room in a specified limited period of time, depending on the size of the ship but not exceeding 5 minutes. On ships constructed before 18th January 2010 the time may be set to, for instance, 2 minutes (A.686(17) section 7.2).

12.17 SOALS II-2/10.6.4 may be referred to for a fuller description of the fire extinguishing system requirements for deep fat fryers installed on board ships constructed on or after 1st July 2002, for example, operation of a second thermostat if an alarm is activated for the failure of the first one or SOLAS II-2/9.7.5.2 for the fire extinguishing arrangement of exhaust ducts of galley ranges if they pass through accommodation spaces.

In addition there are, in chapter 4, various references to Bridge Procedures Guide (BPG) fourth edition, 2007. You may wish to change the references to the latest published Bridge Procedures Guide (BPG) fifth edition, 2016.