Reducing ISM-related Port State Detentions
A quick reference guide to check the health of your safety management system
January 2011
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The data and statistics used in this quick reference guide have been derived from the audit findings arising from ISM Code audits carried out by ABS and from ISM-related deficiencies written during port State interventions and detentions.

Detailed analysis of audit findings and Port State Control (PSC) deficiencies was carried out to identify the most common and recurrent nonconformities, deficiencies and weaknesses. These have been listed against each element of the ISM Code and are designed to serve as leading indicators of effective implementation of the ISM Code requirements.

The guide has been designed primarily for use on board ships to quickly validate the health of the company’s safety management system (SMS) at any given time. It can be used as an effective tool to prepare the vessel for PSC inspections, external or internal audits or to check the effective implementation of the ISM Code on a routine basis.

If any of the common nonconformities listed in this guide are identified on board, immediate action must be taken by the crew to dispose of the same. A record of actions taken should be maintained to serve as evidence that the ‘system’ is functional until such time that action has been taken to eliminate the root cause.
Findings by ISM Code Element

- PSC
- ABS

%ages: 0% 5% 10% 15% 20% 25% 30% 35%

Numbers: 2 3 4 5 6 7 8 9 10 11 12
Findings by ISM Code Element

Outer Band: ABS Findings

Inner Band: PSC Findings

Top 3 Categories by ABS
10: Maintenance of the Ship and Equipment
7: Shipboard Operations
11: Documentation

Top 3 Categories by PSC
10: Maintenance of the Ship and Equipment
7: Shipboard Operations
8: Emergency Preparedness

Period of analysis: 1 January 2008 to 31 December 2009
ELEMENT 2:
Safety & Environmental Protection Policy

A Safety and Environmental Protection (SEP) policy, understood and supported by the crew, provides strong evidence of overall effective implementation of the company’s SMS.

Verify that:

☐ The SEP policy statement is signed off by senior management

☐ The policy is properly controlled and the latest revision is in use

☐ The policy posters are displayed at prominent locations

☐ Crew members are able to demonstrate a general awareness of the contents of the SEP policy

☐ Safety and environmental objectives and targets established in the SMS are consistent with those contained in the policy statement

☐ Onboard procedures and practices support and contribute to the achievement of the objectives and targets established by the company
ELEMENT 3:  
Company Responsibilities & Authority

The provision of support, allocation of resources and overall commitment of the company is vital for the effective implementation of the SMS on board the vessel.

Verify that:

- Responsibility, authority and lines of reporting of key personnel are clearly defined and documented
- Crew is able to demonstrate an awareness of their duties and responsibilities under the SMS
- If the day-to-day operations of the vessel have been delegated to a ship manager, evidence of this delegation by the shipowner is available
- Requisitions for supply of stores and spares and requests for repairs are being followed up by the shore-based management without undue delay
- There is evidence of follow up action and monitoring by shore-based management over all outstanding nonconformities and deficiencies
ELEMENT 4: 
Designated Person(s)

As the custodian of the SMS, the ISM Code places a special responsibility on the designated person ashore (DPA). The nominated person must hold the relevant qualification and experience and demonstrate the commitment required by the position.

Verify that:

- Identity and contact details of the DPA have been reported to the flag Administration, if required
- DPA has direct access to the top management
- Qualification, experience and training of the DPA meet the IMO guidance contained in the Annex to MSC-MEPC.7/Circ.6
- Crew is aware of the identity and contact details of the DPA
- There is evidence that the DPA is engaged in monitoring the safety and pollution prevention aspects of vessel operations
**ELEMENT 5:**
**Master’s Responsibility & Authority**

Master has the responsibility to ensure that the requirements specified in the company’s SMS are being observed. To this end, the Master needs to be completely familiar with the SMS and be given the necessary support and overriding authority to take decisions relating to safety and pollution prevention.

Verify that:

- Master is able to demonstrate his familiarity with his role and responsibility under the ISM Code
- SMS contains a clear statement giving the Master overriding authority to take decisions relating to safety and pollution prevention and to ask for assistance from the company when needed
- Master is aware where this overriding authority is documented and is able to explain the intent of this provision
- Master’s review of the SMS has been carried out as specified in the SMS and that it is effective
- Master’s standing and night orders are current and in accordance with SMS
- Master is verifying that his crew is observing the procedures and processes specified in the company’s SMS
ELEMENT 6: 
Resources & Personnel

The SMS must ensure that all personnel including the crew complement are competent, properly qualified, medically fit and given the proper training and familiarization to safely and efficiently perform their assigned responsibilities.

Verify that:

- Crew on board meet or exceed the minimum safe Manning criteria established by the flag Administration
- Officers and ratings hold valid certificates and endorsements as per the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW)
- All crew hold valid medical fitness certificates
- Master is fully conversant with the company’s SMS
- Safety induction, shipboard familiarization and safety training of crew have been carried out as per SMS
- Crew members are able to effectively communicate as a team in the execution of their duties
- Crew is able to demonstrate their familiarity with the SMS commensurate to their role and responsibility
- Shipboard officers are familiar with relevant Rules and regulations covered by the SMS
Company and ship security officers are qualified and hold valid certificates as required by the Administration.

Watchkeeping schedules have been established and a record of hours of rest is being maintained as per STCW.
ELEMENT 7: 

**Shipboard Operations**

Key shipboard operations that can affect safety and pollution prevention must be backed by documented procedures with responsibility assigned to qualified personnel.

Verify that:

- SMS contains documented procedures for key shipboard operations
- Role and responsibility have been clearly assigned to qualified personnel who are able to demonstrate their familiarity with assigned tasks
- Voyage passage planning is carried out from berth to berth
- Navigational charts and publications for the intended passage are available on board and have been updated to the latest notices to mariners
- Ship stability and stress calculations for different stages of the voyage are being carried out
- Bridge and engine room checklists (arrival, departure, testing controls, watchkeeping, etc.) are being followed
- Permit to work (hot work, entry into enclosed spaces, working aloft, lock out-tag out) procedures are being complied with
- Suitable personnel protective equipment is being used by the crew
- Bunker and fuel transfer procedures are complied with
- Ballast exchange plan is complied with as per regulations
- Waste management plan is properly implemented
- A safe means of embarkation and disembarkation is available
- An efficient gangway watch is maintained and access to the vessel is controlled
ELEMENT 8: Emergency Preparedness

The company should identify all potential emergency situations that can affect its fleet, develop contingency plan to mitigate the adverse impact of these emergencies and periodically test the contingency plans to validate their effectiveness and to train and familiarize the crew.

Verify that:

- Crew emergency response plans and muster lists are current and up-to-date
- Personnel are familiar with their muster stations and assigned duties
- Contingency plans for potential emergency situations are available
- Drills as required by SOLAS and as per company’s SMS have been carried out
- Emergency exercises with shore-based emergency response team have been carried out as required by the SMS
- Post-drill analysis to identify weaknesses and lessons learned is carried out for continual improvement
- Personnel are able to satisfactorily demonstrate emergency drills
- Emergency contact information of shore-based emergency response team is updated and kept current
- All safety equipment is readily available and adequately maintained
- Fire control plans are up-to-date and current
- Means of escape and access are unobstructed
ELEMENT 9:
Reports & Analyses of Nonconformities, Accidents & Hazardous Occurrences

Accidents, incidents, near misses and nonconformities must be reported and analyzed to determine the root cause. Appropriate timely corrective actions must be taken to prevent recurrence. Data collected is to be used for trending and continual improvement.

Verify that:

- All accidents, incidents, injuries and near misses are being reported
- Accidents, incidents, injuries and near misses are being recorded and investigated to determine the root cause
- Timely corrective and preventive action is being taken and records maintained
- Reported accidents and incidents are being closed out in a timely manner after verification of effectiveness of action taken
- Follow up action and monitoring by shore-based management of reported cases and actions taken is evident
- Following a PSC detention, corrective action taken by the ship must not be limited to the PSC deficiencies. Action has been taken to identify and resolve other similar deficiencies existing on board.
ELEMENT 10:
Maintenance of Ship & Equipment

This element deserves special and focused attention. It addresses areas in the SMS where the highest percentage of nonconformities and deficiencies are identified. Nearly 35 percent of all PSC ISM-related deficiencies relate to inadequate maintenance. A vast majority of detainable PSC ISM deficiencies (Code 30) relate to maintenance of ship and equipment.

Verify that:

- Vessel is clean, tidy and well illuminated
- There is no evidence of excessive corrosion and wastage on exposed decks and fittings
- The ship has a planned and preventive maintenance system (PPMS) that is ship-specific and commensurate with the age of the vessel
- PPMS is up-to-date with minimum overdue maintenance items
- Inspection of vessel is carried out as established in the SMS and identified defects are being dealt with
- All class, statutory and trading certificates are up-to-date
- No unauthorized repairs, additions or alterations have been carried out
- Machinery and hull defects and breakdowns have been reported to the company.
- Reported defects are being monitored by the company and timely corrective action is taken to rectify them.
- There is no excessive accumulation of oil in the bilges.
- Air pipes, sounding pipes, ventilators and closing appliances are properly maintained and serviceable.
- Lifeboat/rescue boat lowering winch/davits were well maintained and in good operational condition.
- Critical and standby equipment and systems have been identified and routine testing is being carried out.
- A sufficient stock of spares and stores is available on board as required by the SMS.
- Records of maintenance and test activities are available.
ELEMENT 11: Documentation

All documentation relating to the SMS must be controlled and available at all relevant locations to ensure safe and pollution-free operations.

Verify that:

- All class, statutory and trading certificates relevant to the ship are available
- Latest revisions of the SMS manuals, procedures and records are readily available at relevant locations
- Latest editions of publications required by flag Administration are available
- Copy of the ISM Document of Compliance with the latest endorsement is available
- Deck, engine, global maritime distress safety system and official log books are maintained and up-to-date
- The correct format of the oil record book is in use on board and kept up-to-date
**ELEMENT 12: Company Verification, Review & Evaluation**

Company must ensure that the SMS is effectively implemented and fosters continual improvement through a system of internal audits and management reviews.

Verify that:

- Internal audits have been carried out at intervals not exceeding 12 months by auditors who are independent of areas audited
- External audits have been carried out as required by the ISM Code
- Audit reports are available on board
- Audit findings are being tracked to closure
- Timely corrective action has been taken to close out audit findings
- Shore-based management is monitoring and providing the necessary support in implementation of corrective actions
- Company has developed and implemented a procedure for risk assessments
- Appropriate safeguards have been established against all identified risks to the ship, personnel and the environment
- Management reviews to verify the effectiveness of the SMS are being carried out and records are available

PSC detentions resulting from ISPS-related deficiencies are on the rise. To prevent these, vessels must implement the security measures as per the approved ship security plan. Access to the ship must be controlled through an efficient system of gangway watchmen, visitor identification and checking of personal belongings. Restricted areas must be identified and access to these compartments controlled. The ship security officer and crew should be familiar with the security procedures and their individual security duties. Stores, spares and provisions should be liable to search as required. All security equipment must be in good operational condition. Drills and exercises must be carried out and recorded as required by the SSP.