PORT STATE CONTROL

Annual Report

2025

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ABS COMMITMENT

The American Bureau of Shipping (hereinafter "ABS") is recognized as the leading classification society globally, dedicated to advancing safety, environmental stewardship and regulatory compliance within the maritime industry. Since its establishment in 1862, ABS has been at the forefront of marine safety, providing comprehensive classification services to shipbuilders, owners and operators.

With a network of over 2,000 highly skilled technical professionals strategically positioned worldwide, ABS leverages its extensive expertise, deep industry knowledge and sound professional judgment to support vessel owners and operators in achieving operational excellence.

ABS has built a reputation for its unwavering commitment to quality, establishing rigorous standards of excellence and delivering superior technical and survey services. By assisting clients in meeting these standards, ABS fosters safe, efficient and sustainable maritime operations.

OUR MISSION

The mission of ABS is to serve the public interest as well as the needs of our members and clients by promoting the security of life and property, and preserving the natural environment.

HEALTH, SAFETY, QUALITY AND ENVIRONMENTAL POLICY

We will respond to the needs of our members, clients and the public by delivering quality products and services in support of our mission that provides for the safety of life and property and the protection of the natural environment.

With the input and the participation of our workers, we are committed to continually improving the effectiveness of our Health, Safety, Quality and Environmental Policy (HSQE) performance and management system by identifying risks and opportunities that help to eliminate hazards and reduce risks and by providing safe and healthy working conditions for the prevention of work-related injury, ill health and pollution.

We will comply with all applicable legal requirements as well as any additional requirements ABS subscribes to which relate to ABS and our HSQE aspects, objectives and targets.

FOREWORD

Port State Control (PSC) remains one of the clearest external measures of how effectively vessel compliance, maintenance and operational readiness are being managed in practice. Each inspection outcome reflects the condition of safety-critical systems, the consistency of maintenance, the quality of onboard procedures and the crew's preparedness to demonstrate them.

This report reviews 2025 Port State control trends affecting vessels classed by ABS and vessels for which ABS acted as Recognized Organization (RO), alongside key developments across the Paris Memorandum of Understanding (MoU), Tokyo MoU, and United States Coast Guard (USCG) inspection regimes. It is intended to help owners, operators, surveyors, and auditors understand where PSC exposure remains highest and where focused operational attention can improve outcomes.

The 2025 findings reinforce familiar themes across PSC-active environments: fire safety, International Safety Management (ISM) implementation, lifesaving appliance readiness and maintenance discipline. These are recurring and manageable areas where disciplined execution and sustained readiness remain essential. We hope this report provides a useful reference to assess vessel preparedness and prioritize the areas most relevant to safe and effective operations.

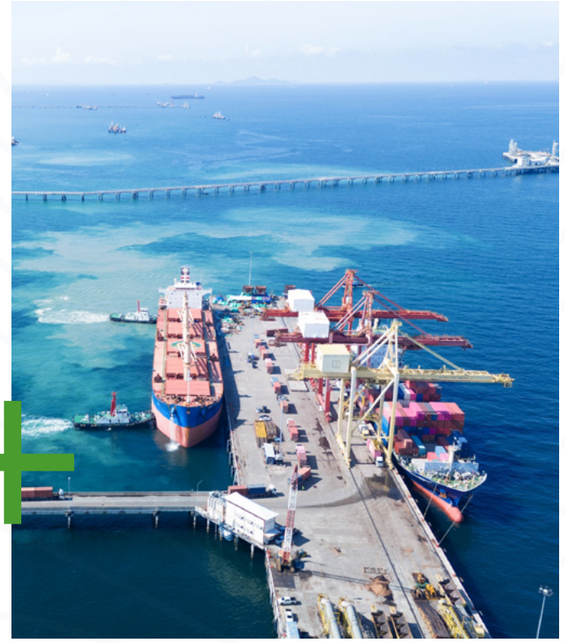
EXECUTIVE SUMMARY

Port State control activity in 2025 reinforced a clear message across the Paris MoU, Tokyo MoU and USCG regimes: detention risk remains highest where technical condition, maintenance discipline and safety management system implementation are not functioning effectively together. The leading detention drivers in 2025 were broadly consistent with the patterns already visible in 2024 and 2023, particularly in fire safety, ISM implementation, lifesaving appliance readiness, onboard maintenance and crew performance.

At the same time, strong inspection outcomes continue to be achieved across ABS-related fleets. In the Paris and Tokyo MoU regimes, inspections involving vessels classed by ABS and/or vessels for which ABS acted as a recognized organization (RO) totaled 6,812 in 2025, of which 3,070, or 45 percent, were completed with no deficiencies. Nearly half of those inspections concluded cleanly, demonstrating that successful PSC outcomes remain achievable through strong preparation, disciplined maintenance and consistent operational execution.

Across the ABS-related dataset, 1,731 total deficiencies and 565 detainable deficiencies were recorded in 2025, resulting in 150 detentions. Although the overall deficiency profile was broad, detention exposure remained concentrated in a limited group of recurring areas. ISM, fixed fire extinguishing installations, fire doors and openings, fire-dampers, lifeboats and crew drill performance accounted for the largest share of detainable deficiencies. These same areas were also prominent in the 2024 and 2023 ABS detention profiles, indicating that the principal sources of detention exposure have remained stable rather than shifting materially from year to year. This consistency means they are well understood and therefore more open to targeted prevention and earlier intervention.

Taken together, the 2023-2025 trend suggests that detention exposure continues to arise less from isolated defects than from recurring weakness in maintenance follow-through, corrective action, system readiness and operational execution. For ABS, these findings provide a practical basis for helping owners, operators, surveyors and auditors focus attention on the issues most likely to affect PSC performance and support more targeted readiness planning in the areas that matter most.



Positive Performance Signals in 2025

- 3,070 ABS-related inspections in the Paris and Tokyo MoU regimes were completed with no deficiencies
- ABS-related detention exposure remained concentrated in a limited number of known, preventable areas

Note: Unless otherwise stated, ABS-related data in this report covers 2025 detention and deficiency records for vessels classed by ABS and vessels for which ABS acted as RO. Regime-level benchmark data is drawn from the published annual reports of the Paris MoU, Tokyo MoU, and United States Coast Guard. USCG does not publish equivalent no-deficiency inspection figures for RO populations, so the clean-inspection statistics cited above reflect Paris and Tokyo MoU data only.

2025 AT A GLANCE

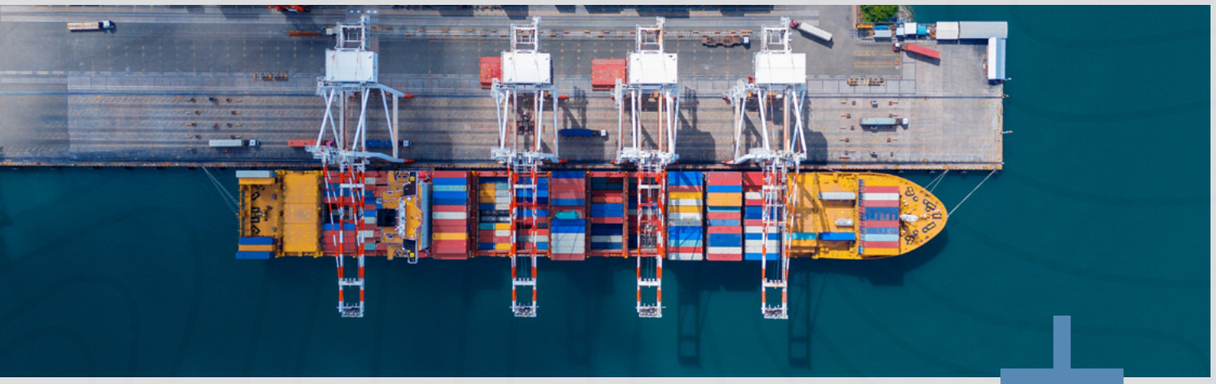
ABS-Related Detentions	Detainable Deficiencies	Top Detainable Deficiency	Most Affected Vessel Type
150	565	ISM	BULK CARRIERS

Top Detention Countries	Paris MoU Detention Rate	Tokyo MoU Detention Rate	USCG Detention Rate
CHINA AND AUSTRALIA	4.18%	3.53%	0.86%

Benchmark Inspection Activity

- Paris MoU inspections: 16,483
- Tokyo MoU inspections: 35,546
- USCG PSC exams: 8,999

2025 readiness profile: ABS-related detention exposure remained concentrated in a limited number of recurring control areas, particularly ISM, fire safety, lifesaving readiness, emergency preparedness and maintenance follow-through.



ILLUSTRATIVE DEFICIENCY EXAMPLES FROM 2025

The 2025 detention and deficiency profile remained concentrated in a limited number of familiar control areas, particularly fire safety, lifesaving readiness, emergency systems and onboard maintenance. The examples below are representative of the types of deficiencies that continued to appear across the ABS-related dataset and the broader PSC environment in 2025. They are included not as isolated cases, but as practical illustrations of recurring conditions most likely to influence PSC outcomes when left uncorrected.

Figure 1: Corroded fire pipe on navigation bridge.

Figure 2: Temporary repair on corroded hydraulic oil pipe joint for rescue boat launching arrangement.

Figure 3: Emergency generator is unable to connect to the emergency switchboard at the time of the operational test.

Figure 4: Hatch cover gaskets were found defective.

These examples reinforce a consistent theme in the 2025 results: the deficiencies most likely to affect PSC outcomes are generally visible, recurring, and preventable when addressed through timely maintenance, effective operational execution and sustained readiness.

2025 DETENTION OVERVIEW

The 2025 detention profile showed that detention exposure in the ABS-related dataset remained concentrated in a relatively limited number of recurring operational risk areas. Of the 565 detainable deficiencies recorded in 2025, the largest concentrations were in fire safety (149), ISM (69), lifesaving appliances (59), emergency systems (44) and safety of navigation (39). These themes are consistent with the detention patterns already visible in 2023 and 2024, reinforcing that the principal drivers of detention remain familiar rather than emerging from a materially new set of PSC concerns.

In practical terms, the issues most closely associated with detention were not unexpected, but well-established areas where sustained operational discipline and onboard readiness continue to matter most. Exposure remained highest where the condition of safety-critical systems, the consistency of maintenance follow-through and the crew's ability to demonstrate familiarity with essential procedures did not align effectively.

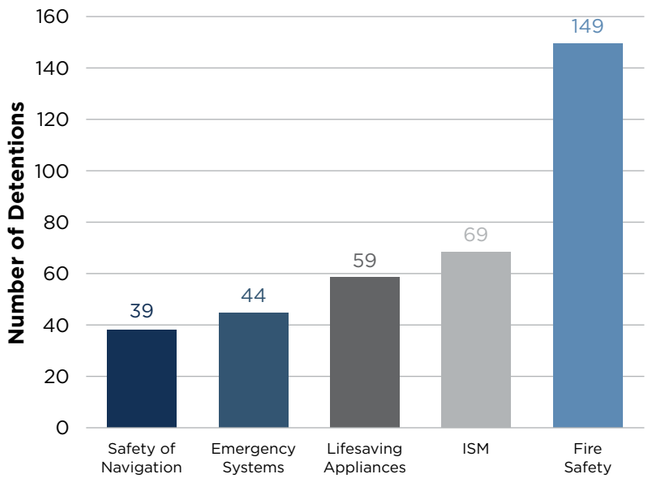


Figure 5: Leading detention categories in the ABS dataset, 2025. Fire safety, ISM, lifesaving appliances, emergency systems and safety of navigation accounted for the largest share of detainable deficiencies associated with detention outcomes.

Detention activity was also concentrated geographically, with China and Australia accounting for the largest share of recorded detentions in the ABS-related dataset. Bulk carriers represented the largest share of detained vessel types in 2025. Together, these patterns indicate that PSC performance continues to be shaped by day-to-day execution on board, particularly in the management of safety-critical equipment, the reliability of maintenance control and the crew's ability to respond confidently during inspection and emergency drills.

For ABS, the continued concentration in familiar areas provides a practical basis for more targeted readiness planning, earlier intervention and focused support in the areas most likely to influence PSC outcomes.

TOP DEFICIENCIES FOR DETENTIONS IN 2025

A total of 565 detainable deficiencies were recorded in the 2025 ABS-related dataset, spanning 162 distinct deficiency codes across the Paris MoU, Tokyo MoU and USCG populations. Although the overall code-level profile was broad, detention exposure remained concentrated in a limited group of recurring findings. The top 10 specific detainable deficiencies accounted for a meaningful share of overall detention exposure, despite the wider profile spanning 162 distinct deficiency codes.

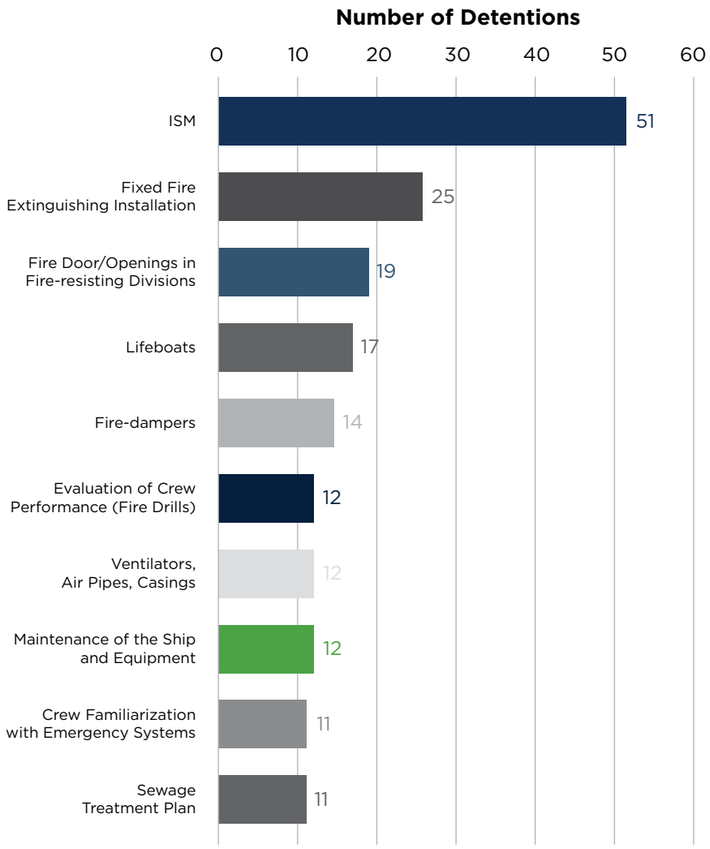


Figure 6: Top 10 detainable deficiencies in the ABS-related dataset, 2025. While 162 distinct deficiency codes were recorded, a smaller group of recurring findings accounted for a significant share of detention exposure.

The most frequently recorded individual detainable deficiency was ISM (51), followed by repeated findings involving fixed fire extinguishing installations (25), fire doors and openings in fire-resisting divisions (19), lifeboats (17), fire-dampers (14), evaluation of crew performance during fire drills (12), ventilators, air pipes, and casings (12), maintenance of the ship and equipment (12), crew familiarization with emergency systems (11) and sewage treatment plans (11).

Viewed together, these findings show that the most common detention-related deficiencies in 2025 remained concentrated in four control themes: management system effectiveness, fire safety integrity, lifesaving readiness and maintenance of essential shipboard systems. The pattern is also broadly consistent with the detention experience seen in 2023 and 2024, when ISM, maintenance, fire safety systems and lifesaving appliances likewise remained among the most persistent sources of PSC exposure.

The prominence of ISM is particularly significant because it often points beyond a single technical defect alone. In many cases, an ISM-related detention finding reflects wider weaknesses in defect reporting, maintenance control, corrective action follow-up, onboard supervision, or procedural implementation. Likewise, the repeated appearance of fire safety and lifesaving-related findings confirms that PSC attention remains focused on areas where both the material condition of equipment and the crew's practical readiness must be demonstrated clearly during inspection.

Overall, the top detention-related deficiencies in 2025 suggest that the greatest exposure remained tied to known and recurring weaknesses rather than unusual or unexpected findings. For owners, operators, surveyors and auditors, this concentration provides a practical basis for more targeted prevention, particularly in the areas already shown to carry the greatest detention consequence.

VESSEL TYPE CONCENTRATION OF DETENTIONS

Detention activity in 2025 was also concentrated by vessel type, with bulk carriers accounting for 75 of the 150 recorded detentions in the ABS-related dataset. Containerships (24), oil tankers (13), and oil tanker/chemical tankers (12) formed the next largest groups, while all remaining vessel types accounted for a comparatively smaller combined share.

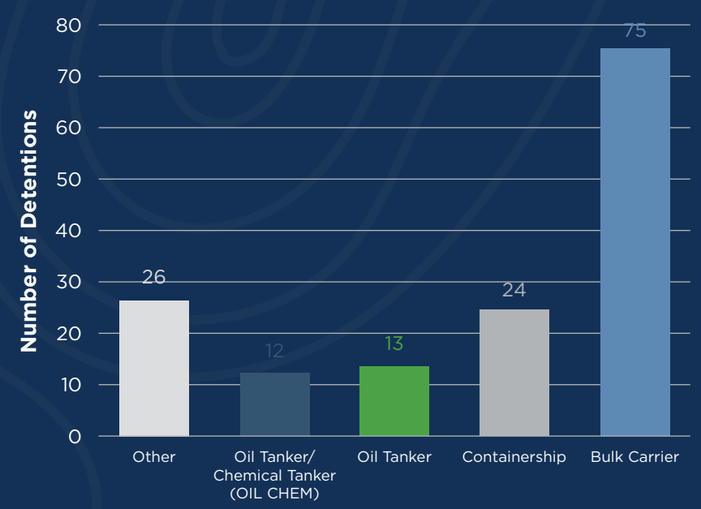


Figure 7: Leading detained vessel types in the ABS-related dataset, 2025. Bulk carriers accounted for the largest share of detentions, followed by containerships, oil tankers and oil tanker/chemical tankers, indicating that detention exposure in 2025 was concentrated in a limited number of vessel segments.

This distribution indicates that detention exposure was not spread evenly across the fleet profile, but was concentrated in a limited number of vessel segments. Vessel type is relevant because it often reflects differences in trading pattern, inspection frequency, equipment configuration, operating condition and the types of recurring PSC findings most likely to arise in service.

These results are best understood as indicators of operational exposure rather than simple performance rankings by ship type. The prominence of bulk carriers in the 2025 detention dataset points to the importance of aligning PSC preparation with the operational profile of the vessel segments most frequently exposed to detailed inspection activity and recurring control challenges. This concentration by vessel type was also reflected geographically, with detention activity in 2025 occurring disproportionately in a limited number of PSC countries.

GEOGRAPHIC CONCENTRATION OF DETENTIONS

In 2025, detention activity in the ABS-related dataset was concentrated in a limited number of PSC countries rather than distributed evenly across the overall trading profile. This pattern was shaped primarily by the Tokyo MoU and Paris MoU populations, with distinct country patterns visible in each regime. In practical terms, this helps indicate where detention exposure was encountered most frequently and where PSC preparation may require greater attention.

Within the Paris MoU population, detention activity in the ABS-related dataset was led by Canada (14), followed by Italy (7), the Netherlands (4), and the United Kingdom and Malta (3 each). Within the Tokyo MoU population, detention activity was centered more strongly in China (48) and Australia (26), with Chile, Canada and Singapore (5 each) forming a secondary group of concentrations.

These geographic results are best understood as indicators of trading and inspection exposure, rather than as simple country rankings. In both MoUs, the countries most represented in the detention dataset are also among the more active PSC environments, where recurring shortcomings are more likely to be identified through frequent inspections and more detailed port State attention. The differing country profiles between Paris and Tokyo also underline the importance of assessing PSC exposure by regime and trading pattern, rather than treating detention risk as geographically uniform.

For vessels trading regularly in higher-exposure PSC environments, the 2025 results suggest value in aligning readiness planning more closely with the inspection expectations typically encountered in those regimes and countries.

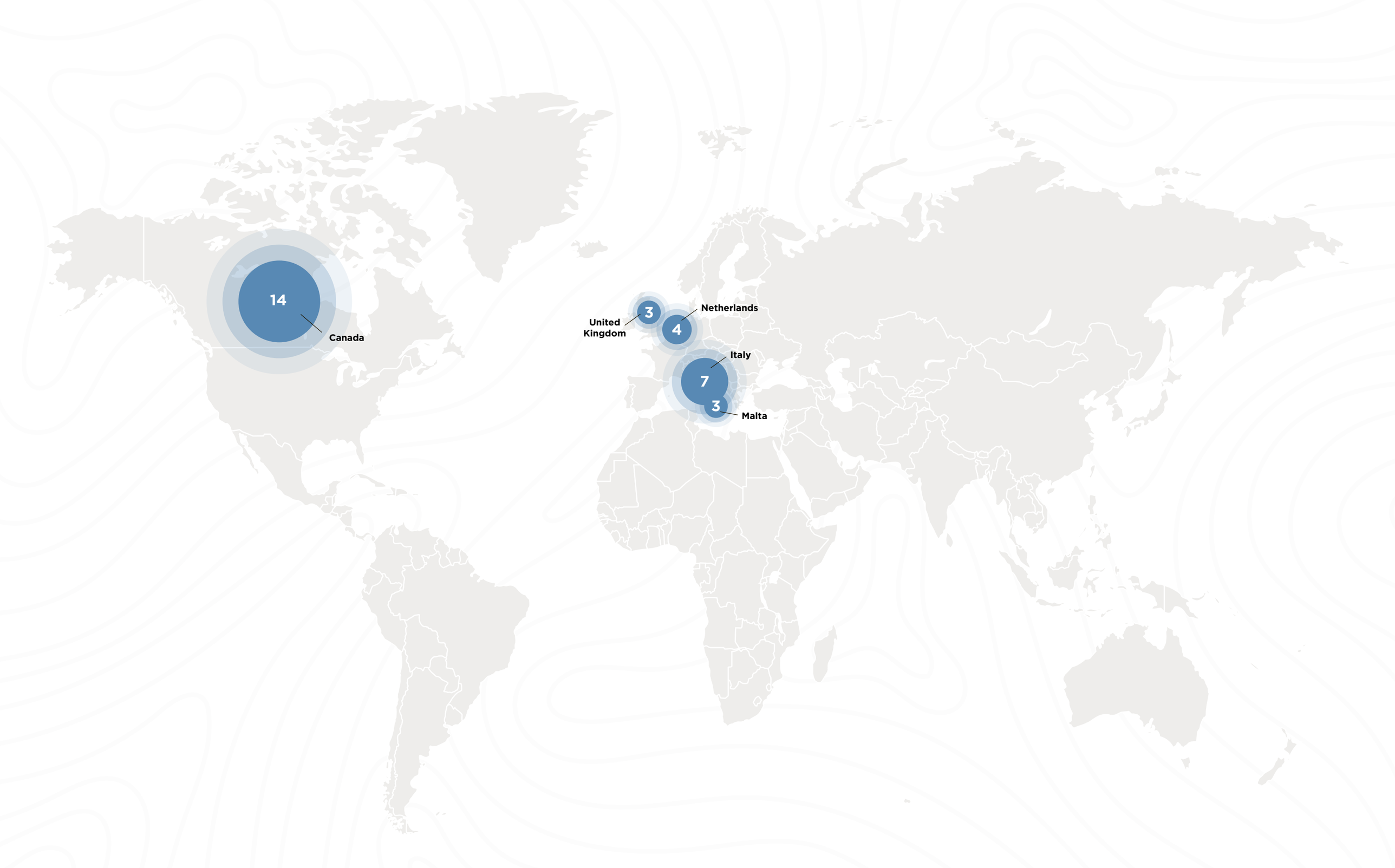


Figure 8: Top Paris MoU detention countries in the ABS-related dataset, 2025. ABS-related detention activity within the Paris MoU population was led by Canada, followed by Italy, the Netherlands, the United Kingdom and Malta.

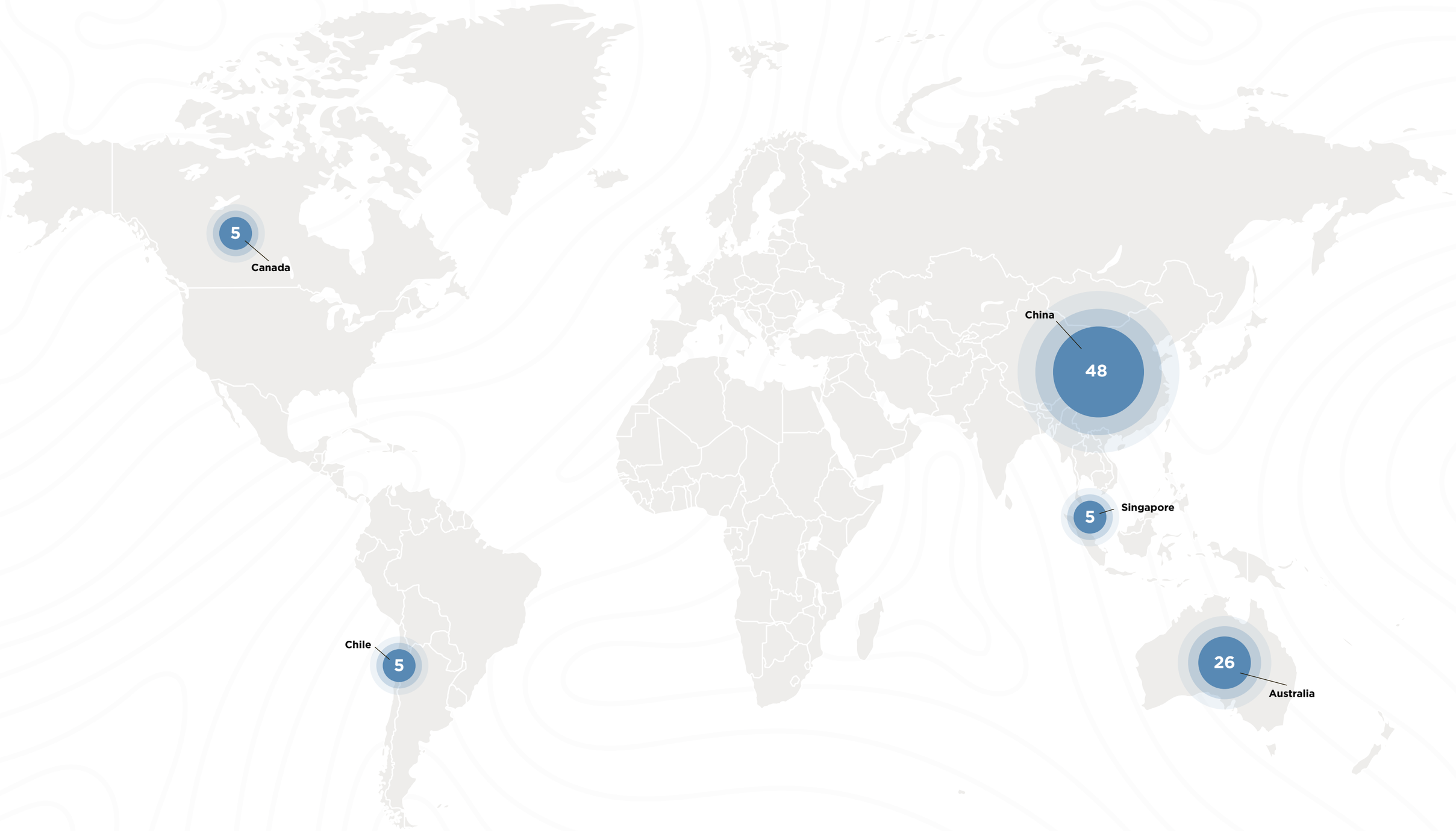


Figure 9: Top Tokyo MoU detention countries in the ABS-related dataset, 2025. ABS-related detention activity within the Tokyo MoU population was concentrated primarily in China and Australia, with smaller secondary concentrations in Chile, Canada and Singapore.

PARIS MOU 2025

Paris MoU 2025 at a Glance:

16,483 Inspections | 692 Detentions | 4.18% Detention Rate

The Paris MoU remained one of the more demanding PSC environments in 2025, with 16,483 inspections carried out and 692 detentions recorded, resulting in an overall detention rate of 4.18 percent. This represented a further increase from 4.03 percent in 2024 and 3.81 percent in 2023, indicating that detention pressure in the region continued to rise over the last three reporting periods even as total inspection volumes remained relatively stable. The Paris MoU annual report also noted an increase in refusals of access (bans) to 19 in 2025, reinforcing the firmness of enforcement in the region.

Year	Inspections	Detentions	Detention Rate
2023	16,769	639	3.81%
2024	16,508	665	4.03%
2025	16,483	692	4.18%

Table 1: Paris MoU inspection and detention trend, 2023-2025. Inspection activity remained broadly stable across the three-year period, while the detention rate increased from 3.81 percent in 2023 to 4.18 percent in 2025.

A notable feature of the Paris MoU's 2025 results was the breadth of non-compliance across multiple inspection areas. No single deficiency category emerged as the sole driver of detention exposure. This is also consistent with Paris MoU's own assessment, which found no significant shift toward non-compliance in any single convention or regulatory area, but instead identified recurring weaknesses across several established control themes. In this context, vessels trading in the Paris MoU region appear more likely to be assessed on the overall quality of shipboard readiness than on any one isolated technical issue alone.

The Paris MoU deficiency profile supports that view. The leading deficiency groups in 2025 were SOLAS Chapter II-2 (fire safety) at 16.8 percent, SOLAS Chapter II-1 (structural and electrical elements) at 11.6 percent, MLC 2006 Title 4 at 10 percent, SOLAS III (lifesaving appliances) at 9 percent, and SOLAS Chapter V (safety of navigation) at 8 percent. At the more specific deficiency level, fire doors and openings in fire-resisting divisions remained a prominent area of non-compliance at 3.1 percent, while ISM-related deficiencies accounted for 4.5 percent of total findings. The Paris MoU annual report also identified Seafarers' Employment Agreements (1.3 percent) as a continued area of non-compliance. Taken together, these results point to a regime in which technical condition, crew welfare and management system effectiveness continue to be assessed in combination rather than in isolation.

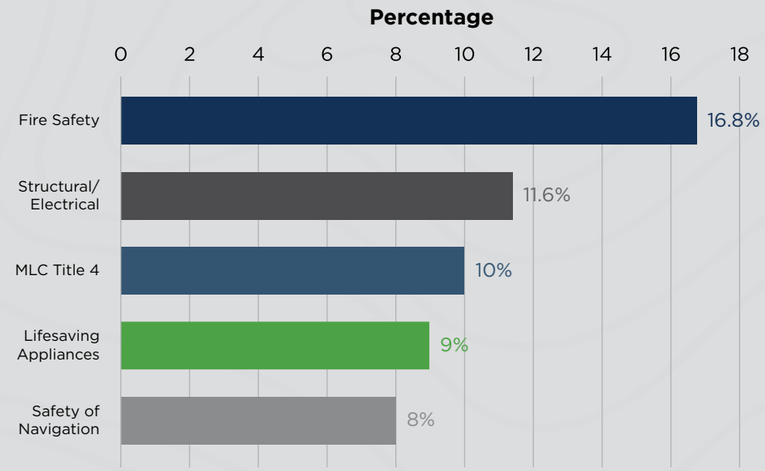


Figure 10: Leading Paris MoU deficiency groups, 2025. The 2025 Paris MoU profile showed a broad distribution across fire safety, structural and electrical elements, MLC Title 4, lifesaving appliances, and safety of navigation, reinforcing that detention exposure in the region remains tied to overall shipboard readiness.

This same pattern was also visible within the ABS-related dataset. Within that subset, 274 detainable deficiencies were recorded across 112 distinct deficiency codes. The leading specific deficiencies were ISM (37), fire doors/ openings in fire-resisting divisions (13), evaluation of crew performance during drills (12), lifeboats (8), and crew familiarization with emergency systems (7). Geographically, detention activity in the ABS-related Paris subset was concentrated most heavily in Canada (14), followed by Italy (7) and the Netherlands (4).

Taken together, the 2025 Paris MoU results indicate that strong regional performance depends on sustained control across multiple shipboard systems. Fire protection, structural and electrical condition, lifesaving readiness, navigation-related compliance and safety management implementation all remained subject to detailed scrutiny, reinforcing the importance of consistent shipboard readiness in vessels trading in this region.

TOKYO MOU 2025

Tokyo MoU 2025 at a Glance:

35,546 Inspections | 1,255 Detentions | 3.53% Detention Rate

The Tokyo MoU remained a major PSC exposure environment in 2025, with 35,546 inspections carried out on 19,980 individual ships and 1,255 detentions recorded, resulting in an overall detention rate of 3.53%. Although the detention rate continued its recent downward trend, the total number of inspections increased again in 2025 and reached the highest level in the history of the Tokyo MoU. Compared with 2024, this indicates a regime in which overall detention frequency eased slightly, but inspection intensity remained exceptionally high.

Year	Inspections	Detentions	Detention Rate
2023	30,887	1,334	4.32%
2024	32,054	1,189	3.71%
2025	35,546	1,255	3.53%

Table 2: Tokyo MoU inspection and detention trend, 2023-2025. Inspection activity continued to increase across the three-year period, while the detention rate declined from recent highs but remained above pre-pandemic levels.

A central message in the Tokyo MoU annual report was the continued concern regarding under-performing ships and the persistently high share of ISM-related detentions. This is also consistent with the Tokyo MoU's own assessment, which repeated its concern over the continued increase in under-performing ships during the past three years and the persistently high number and share of ISM-related detentions. In 2025, the Tokyo MoU identified 222 vessel cases involving 52 individual ships as under-performing ships. Taken together, these indicators suggest that PSC exposure in the region continues to be shaped not only by isolated technical deficiencies, but also by broader weaknesses in onboard management, maintenance follow-up and the effective implementation of shipboard systems.

The Tokyo MoU deficiency profile reinforces this view. Fire safety, lifesaving appliances, working and living conditions, and safety of navigation together accounted for 53 percent of all recorded deficiencies in 2025. The annual report also noted continuing increases in deficiencies related to structural condition, emergency systems, and propulsion and auxiliary machinery, linking these trends to ongoing concerns over the effectiveness of maintenance carried out onboard ships. These results suggest that, in the Tokyo MoU environment, sustained compliance depends on the combined condition, reliability and management of multiple shipboard systems rather than isolated technical items alone.

These priorities were also reflected in the ABS-related dataset. Within that subset, 97 detentions were recorded, with 277 detainable deficiencies across 112 distinct deficiency codes. The leading ABS-related Tokyo deficiencies were fixed fire extinguishing installation (18), ISM (14), fire dampers (10), maintenance of the ship and equipment (10) and sewage treatment plan (9). Geographically, detention activity in the ABS-related Tokyo subset was concentrated most heavily in China (48), followed by Australia (26) and Chile (5).

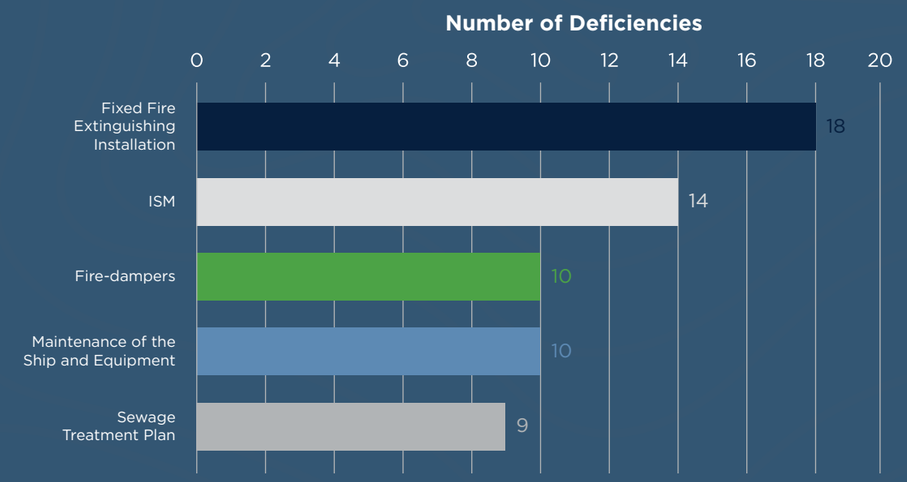
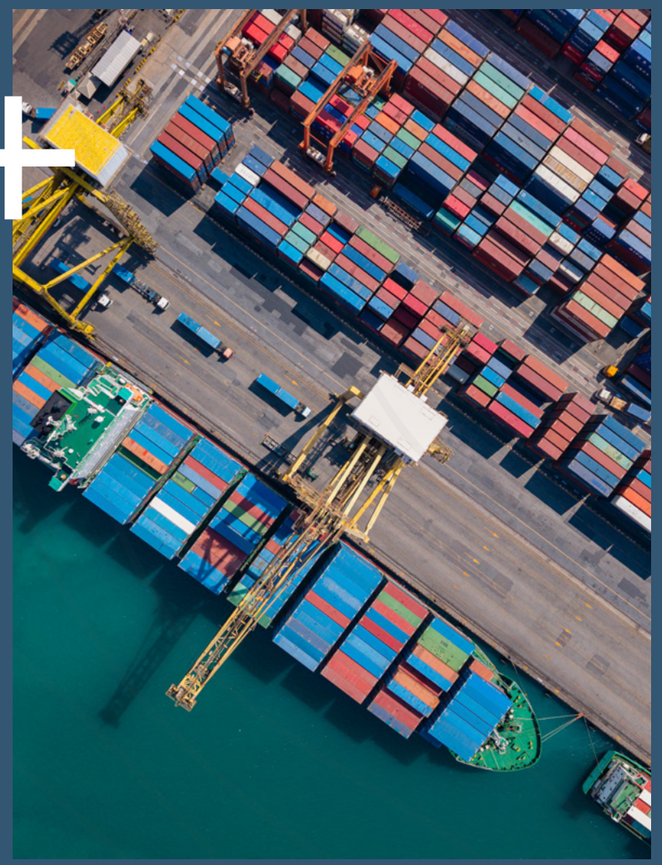


Figure 11: Leading ABS-related Tokyo MoU deficiencies, 2025. Within the ABS-related dataset, recurring findings were concentrated in fire protection systems, ISM, maintenance-related items and pollution prevention items.

The 2025 Tokyo MoU report also points to a wider shift toward performance-based transparency. Following a successful trial in 2025, the Tokyo MoU will begin publishing lists of high-performing and under-performing companies from 2026. The Committee also adopted guidelines for enhanced machinery and maintenance inspections, reinforcing the growing emphasis on the condition and upkeep of essential shipboard systems. Taken together, these developments suggest that PSC performance in the region is moving toward greater external visibility, with increasing emphasis on company-level consistency as well as vessel-level compliance.

At the same time, the Tokyo MoU's recognized organization performance data continued to place ABS in the high-performance category providing useful context that ABS-related performance remained comparatively strong within a high-volume regional inspection environment. For operators trading regularly in the Asia-Pacific region, the 2025 results underline the importance of maintaining not only technical compliance, but also effective shipboard management across maintenance, environmental systems and safety management implementation.



UNITED STATES COAST GUARD 2025

United States Coast Guard 2025 at a Glance:

8,999 PSC Exams | 78 Detentions | 0.86% Detention Rate

The United States Coast Guard (USCG) remained an important PSC benchmark in 2025, conducting 8,999 PSC exams and recording 78 detentions, resulting in an overall detention rate of 0.86 percent. This represented a further improvement from 2024 and continued the recent positive trend noted in the USCG annual report. Compared with 101 detentions in 2023 and 82 in 2024, the 2025 results indicate that detention frequency continued to decline even as total exam activity increased. The annual report also noted that the three-year rolling detention rate declined to one percent in 2025, reinforcing the broader improvement trend. Although the USCG detention rate remained lower than those of the Paris and Tokyo MoUs, the USCG PSC environment remains significant because of its detailed examination framework and continued emphasis on safety, security and environmental compliance.

Year	Inspections	Detentions	Detention Rate
2023	8,278	101	1.22%
2024	8,710	82	0.94%
2025	8,999	78	0.86%

Table 3: USCG PSC exam and detention trend, 2023-2025. Examination activity continued to increase across the three-year period, while detentions declined and the overall detention rate improved.

The USCG annual report attributes this improved detention performance in part to stronger industry focus on safety, quality and the effective implementation of safety management systems. The report also highlighted continued participation in the QUALSHIP 21 and E-Zero programs, which ended 2025 with 4,659 and 605 enrolled vessels, respectively, underscoring the continued emphasis placed on quality shipping and environmental stewardship. At the same time, the lower detention rate should not be understood as reduced scrutiny, but as evidence that sustained preparation and management discipline continue to influence outcomes.

The USCG deficiency profile in 2025 supports that view. Fire safety measures remained the largest category of deficiencies at 17.78 percent of total deficiencies, followed by life-saving appliances (5.03 percent), ILO-related deficiencies (4.18 percent), propulsion and auxiliary machinery (3.67 percent), and stability, structure and related equipment (3.37 percent). The USCG's detainable deficiency overview also highlighted continued attention to fire safety and safety management systems, with fire safety deficiencies leading all operational deficiency categories for the fifth straight year and maintenance of the ship and equipment again leading the SMS-related deficiency group. In ballast water management, the report noted improvement in system reliability and reporting compliance, while also observing that ballast water management system (BWMS) deficiencies remained the most frequent ballast water-related deficiency type in 2025.

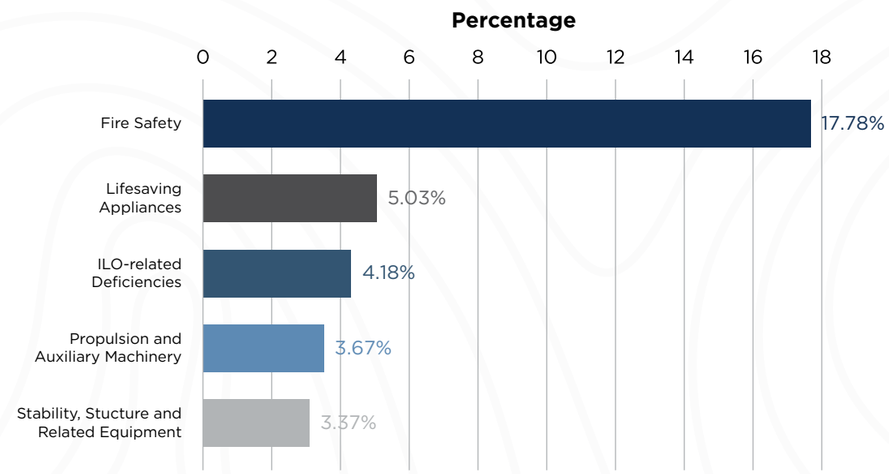


Figure 12: Leading USCG deficiency categories, 2025. Fire safety remained the largest deficiency category in the USCG PSC environment, followed by life-saving appliances, ILO-related items, machinery and stability/structure-related deficiencies.

This pattern was also reflected, at a smaller scale, in the ABS-related dataset. Within the ABS-related USCG subset, five detentions were recorded, with 15 detainable deficiencies in total. The most frequently recurring ABS-related findings were maintenance of the ship and equipment and fire detection and alarm systems, each recorded twice. Although limited in number, these findings remain consistent with the broader 2025 PSC pattern, particularly in the areas of maintenance effectiveness, safety system readiness and the control of essential onboard systems.

Overall, the 2025 USCG results point to a comparatively lower detention but still highly disciplined inspection environment. For vessels trading in the United States, strong PSC performance continues to depend on consistent management of safety-critical systems, environmental compliance arrangements, and the day-to-day effectiveness of onboard management and maintenance practices.

CROSS-REGIME INSIGHTS

The 2025 PSC results across the Paris MoU, Tokyo MoU and USCG showed a high degree of consistency in the areas most closely associated with inspection and detention exposure. Although the three regimes differ in scale, detention rate and inspection emphasis, the broader pattern remained stable across regions and vessel types.

Fire safety remained the most visible shared theme in 2025. It was the leading deficiency group in both the Paris MoU and USCG environments and continued to feature prominently in the Tokyo MoU and the ABS-related detention dataset. Repeated findings involving fixed fire extinguishing installations, fire doors and openings, fire dampers and drill performance reinforce that fire protection remained one of the clearest indicators of PSC readiness across all three regimes.

ISM-related deficiencies also remained central. The Tokyo MoU again highlighted the high share of ISM-related detentions, the Paris MoU continued to record ISM-related deficiencies as a notable part of the overall profile and ISM was the single most frequently cited detainable deficiency in the ABS-related dataset. Across regimes, this points to a common conclusion: PSC outcomes continue to depend not only on equipment condition, but also on whether onboard management systems are functioning effectively and consistently.

Other recurring areas included lifesaving appliances, emergency systems, maintenance-related deficiencies, and environmental compliance, particularly ballast water management. Together, these patterns indicate that PSC performance continued to be shaped by a relatively stable set of operational control areas rather than by isolated or unpredictable findings.

At the same time, each regime retained its own distinct character. The Paris MoU remained the highest detention environment of the three, with broad scrutiny across technical and labor-related areas. The Tokyo MoU remained the highest volume regime and showed increasing emphasis on company-level accountability. The USCG recorded the lowest detention rate but continued to apply detailed examinations with strong focus on safety, security and environmental control.

Regime	2025 Detention Rate	Defining Characteristic
Paris MoU	4.18%	Broad technical and labor-related scrutiny
Tokyo MoU	3.53%	Highest inspection volume; strong ISM focus
USCG	0.86%	Lower detention rate; detailed examinations and sustained safety/environmental focus

Taken together, the 2025 results show that the most important PSC control areas remained consistent across all three regimes: fire safety, effective safety management, maintenance follow-through, lifesaving readiness and environmental compliance. While the level and style of scrutiny varied by regime, the underlying readiness expectations remained closely aligned.

2025 CONCENTRATED INSPECTION CAMPAIGN

The Paris MoU and Tokyo MoU conducted a joint Concentrated Inspection Campaign (CIC) on Ballast Water Management from September 1 to November 30, 2025. The campaign reflected the increasing importance of environmental compliance as a practical area of PSC attention, particularly where the operation, maintenance, and reporting of ballast water management arrangements are concerned.

During the campaign period, 9,244 PSC inspections were carried out, including 6,930 inspections using the CIC questionnaire. A total of 184 ships subject to the campaign were detained, corresponding to an overall detention rate of 2.66% during the inspection period. Of those, 30 detentions were directly attributed to CIC-related deficiencies, representing a 0.43% CIC-topic detention rate. According to the Tokyo MoU annual report, the most common deficiencies, including those resulting in detention, were associated with the proper operation of BWMS.

For owners and operators, the 2025 CIC results reinforce that ballast water management should be treated as an operational priority rather than solely as a documentation requirement. Effective compliance depends on the reliability of onboard treatment systems, crew familiarity with operating procedures, and consistent reporting and recordkeeping. As environmental compliance continues to attract attention across major PSC regimes, these areas are likely to remain visible in future inspection activity.

SUSTAINED PSC READINESS AND PERFORMANCE

The 2025 PSC results across the Paris MoU, Tokyo MoU and USCG point to a stable set of operational control areas that continue to influence inspection and detention outcomes across vessel types and trading patterns. Across both the combined ABS-related dataset and the three external regime annual reports, the same themes remained prominent: fire safety, ISM effectiveness, lifesaving readiness, maintenance discipline and environmental compliance. These areas provide a practical framework for where owners, operators, surveyors, and auditors can focus attention to strengthening PSC performance over time.

Focused PSC Readiness Areas

Focus Area	Why it Matters	For Owners and Operators	For Surveyors and Auditors
Fire Safety and Emergency Preparedness	Fire safety remained the leading PSC risk area in 2025, with repeated findings involving fixed fire extinguishing installations, fire-dampers, fire detection systems and crew performance during fire drills.	Maintain fire protection systems in a demonstrably ready condition, with attention to operability, closing arrangements, isolation integrity and routine testing. Confirm crews can respond confidently during drills and explain the use of essential fire-fighting systems in practice.	Treat repeated fire safety deficiencies not only as equipment issues, but as possible signs of wider weaknesses in maintenance execution, testing routines and crew familiarity.
ISM Implementation and Onboard Management Control	ISM was the single most frequently cited detainable deficiency in the ABS-related dataset and remained a recurring concern across all three PSC regimes.	Focus on whether the safety management system is functioning effectively onboard, not documentation alone. Ensure maintenance routines, corrective actions, drills and procedural controls are consistently implemented, followed up, and supported by credible records.	Treat ISM-related findings as possible indicators of wider weaknesses in corrective action, maintenance follow-through, procedural implementation or management oversight. Focus on systemic contributors, not only the immediate finding.
Lifesaving Appliances and Essential Emergency Systems	Lifesaving appliances, emergency systems and related crew familiarization issues remained prominent across the 2025 PSC profile. Recurring findings included lifeboats, crew familiarization with emergency systems and other readiness-related deficiencies.	Maintain lifeboats, launching arrangements, emergency systems and related equipment as continuous operational priorities rather than inspection-specific preparation items. Confirm crews can demonstrate familiarity with emergency arrangements clearly and without hesitation.	Assess not only technical condition, but also practical readiness. Weaknesses in crew demonstration, equipment operability or emergency system familiarity may signal broader gaps in onboard discipline and preparedness.
Maintenance Discipline and Condition of Shipboard Systems	Deferred maintenance, unresolved defects and gaps in maintenance records continue to be among the most important practical drivers of PSC exposure across all three regimes.	Ensure maintenance routines are timely, traceable, and supported by records that match the condition of equipment onboard. Give particular attention to temporary repairs, overdue items and recurring defects affecting safety-critical or statutory items.	Treat maintenance-related findings as visible indicators of how effectively a vessel is being managed in practice. Where repeated equipment condition issues are identified, engage early with the vessel and company to address the underlying pattern before it escalates.
Environmental Compliance and Pollution Prevention	Ballast water management and pollution prevention equipment attracted increased attention in 2025, including the joint Paris and Tokyo MoU Concentrated Inspection Campaign on ballast water management.	Treat environmental compliance as an active operational priority, not only a certification matter. Maintain ballast water management systems and pollution prevention equipment in reliable working order, and confirm crews understand both operating procedures and recordkeeping expectations.	Pay close attention where equipment reliability, operational use and record accuracy are not aligned. Recurring issues may indicate that compliance is being managed administratively rather than operationally.

The 2025 PSC results across the Paris MoU, Tokyo MoU and USCG showed a high degree of consistency in the areas most closely associated with inspection and detention exposure. Although the three regimes differ in scale, detention rate and inspection emphasis, the broader pattern remained stable across regions and vessel types.

Fire safety remained the most visible shared theme in 2025. It was the leading deficiency group in both the Paris MoU and USCG environments and continued to feature prominently in the Tokyo MoU and the ABS-related detention dataset. Repeated findings involving fixed fire extinguishing installations, fire doors and openings, fire dampers and drill performance reinforce that fire protection remained one of the clearest indicators of PSC readiness across all three regimes.

ISM-related deficiencies also remained central. The Tokyo MoU again highlighted the high share of ISM-related detentions, the Paris MoU continued to record ISM-related deficiencies as a notable part of the overall profile and ISM was the single most frequently cited detainable deficiency in the ABS-related dataset. Across regimes, this points to a common conclusion: PSC outcomes continue to depend not only on equipment condition, but also on whether onboard management systems are functioning effectively and consistently.

Other recurring areas included lifesaving appliances, emergency systems, maintenance-related deficiencies, and environmental compliance, particularly ballast water management. Together, these patterns indicate that PSC performance continued to be shaped by a relatively stable set of operational control areas rather than by isolated or unpredictable findings.

At the same time, each regime retained its own distinct character. The Paris MoU remained the highest detention environment of the three, with broad scrutiny across technical and labor-related areas. The Tokyo MoU remained the highest volume regime and showed increasing emphasis on company-level accountability. The USCG recorded the lowest detention rate but continued to apply detailed examinations with strong focus on safety, security and environmental control.

Supporting PSC Readiness

The recurring nature of PSC findings indicates that the areas most associated with detention are also the areas where targeted preparation, earlier intervention, and sustained operational control can make the greatest difference. ABS can use these insights to support owners, operators, surveyors, and auditors in focusing attention where it is most likely to improve outcomes.

RESOURCES AND ABS CONTACT INFORMATION

Additional PSC-related information and industry resources are available through the following organizations:

- **Paris MoU:** www.parismou.org
- **Tokyo MoU:** www.tokyo-mou.org
- **United States Coast Guard:** www.dco.uscg.mil
- **Mediterranean MoU:** www.medmou.org/home.aspx
- **Black Sea MoU:** www.bsmou.org
- **Indian Ocean MoU:** www.iomou.org
- **Caribbean MoU:** www.caribbeanmou.org
- **Acuerdo de Viña del Mar:** alvm.prefecturanaval.gob.ar
- **Abuja MoU:** www.abujamou.org
- **Riyadh MoU:** www.riyadhmou.org

ABS Contact Information: If Your Vessel Is Detained

Owners and representatives are to notify ABS when a vessel is detained by a port state authority or flag Administration. ABS can assist owners and masters in responding to detention cases and supporting efforts to clear the vessel from detention.

Europe Operations
Piraeus, Greece
Tel: +30 210-9441-000 or
Tel: +30 210-9441-220
Email: EuropeSurvey@eagle.org

Greater China Operations
Shanghai, China
Tel: 86-21-2327-0888
Marine Email: GCSurvey@eagle.org
Offshore Email: GCSurveyOffshore@eagle.org

Pacific and Middle East/Africa Operations
Singapore
Tel: +65 6276 8700
Marine Email: PACMEA-SurveyMarine@eagle.org
Offshore Email: PACMEA-SurveyOffshore@eagle.org

North and South America Operations
Houston, TX USA
Tel: +1 (281) 877-6000
Marine and Offshore Email: AmericasSurvey@eagle.org

Local Port Office Contact
Website: www.eagle.org/contact

APPENDIX 1

Frequently Asked Questions: Cargo Securing Manual

Cargo securing will receive increased regulatory attention in 2026, as the Paris MoU and Tokyo MoU have announced a joint Concentrated Inspection Campaign (CIC) on Cargo Securing of Cargo Units and Cargo Transport Units. Appendix 1 provides practical guidance and answers to frequently asked questions related to Cargo Securing Manuals (CSM), cargo securing arrangements, lashing calculations, Cargo Safe Access Plans (CSAPs) and associated Port State Control inspection expectations.

1. **Does the ship carry an approved CSM on board?**

   Yes, an approved CSM is to be kept on board, ready for use by the crew for cargo ships, including but not limited to container, bulk and general carriers.

2. **If the CSM was approved under MSC/Circ.385, MSC/Circ. 745, MSC.1/Circ.1353 (2010) or MSC.1/Circ.1353/Rev.1, under what conditions does it remain acceptable without re-approval, and do any provisions of MSC.1/Circ.1353/Rev.2 or MSC.1/Circ.1623 apply retroactively?**

   A CSM approved under MSC/Circ.745, MSC.1/Circ.1353 (2010), or MSC.1/Circ.1353/Rev.1 generally remains acceptable without re-approval, provided there have been no material changes to the ship or its cargo securing arrangements.

   MSC.1/Circ.1353/Rev.2 chapters 1 to 4 were not revised and continue to apply to existing ships with keels laid before January 1, 2015. The requirements in section 5.2 CSAP were incorporated specifically for containerships on other vessels that stack containers on deck keel laid on or after January 1, 2015.

   CSMs approved under MSC/Circ.385 should have been revised if the ship carries containers in a standardized system.

   MSC.1/Circ.1353/Rev.2 and MSC.1/Circ.1623 are generally not applied retroactively. However, if weather-dependent lashing of non-standardized or semi-standardized cargo is intended, the CSM should be updated and approved in accordance with MSC.1/Circ.1353/Rev.2 and MSC.1/Circ.1623. The flag Administration may also impose additional requirements, particularly for newly approved or substantially revised manuals.

3. **Confirm the applicable revision chain of MSC.1/Circ.1353 for CSM approvals and identify which instrument is currently recognized as the applicable approval standard to ensure fleet documentation references remain aligned.**

   The IMO guidance for CSMs has evolved through the following revision chain: MSC/Circ.745, Annex 13 → MSC.1/Circ.1353/Rev.1 (2010) → MSC.1/Circ.1353/Rev.2 (current revision).

   The applicable approval standard depends on the vessel's construction date and the regulatory basis under which the CSM was originally approved. CSMs approved in accordance with earlier versions of the IMO guidance may continue to be accepted where they remain valid under the original approval framework and any applicable flag Administration requirements.

   For new approvals and revisions, MSC.1/Circ.1353/Rev.2 is the current IMO guidance for preparing and approving CSMs for vessels built after January 1, 2015.

   The applicable approval basis should be clearly identified in the approval documentation and reflected within the CSM itself to maintain consistency between vessel records, approval documentation and onboard references.

4. **How can we show that the CSM carried on board is the latest approved version? Is a revision record, amendment page, endorsement or other special statement required to demonstrate compliance during a Port State Control inspection?**

   There is no general IMO requirement for a special endorsement, addendum or revision record solely to demonstrate compliance with the latest guidance. However, the CSM should accurately reflect the ship's current cargo securing arrangements and securing equipment. The CSM should be updated whenever it no longer reflects the vessel's actual cargo securing arrangements.

   During a Port State Control inspection, the ship should be able to produce:

   - The approved CSM
   - The approval letter or approval documentation issued on behalf of the Administration
   - Any approved amendments or revision pages
   - Supporting approval stamps, signatures or endorsements, where applicable

   The onboard manual should match the approved documentation. Missing sections, unauthorized alterations, or differences between the approved manual and the actual cargo securing arrangements on board may be considered a deficiency.

5. **What makes a CSM ship-specific? What information should be included to demonstrate that the manual is written for this particular ship and not simply a generic document?**

   The CSM is required to be ship-specific. The manual should accurately describe:

   - The cargo securing equipment that is fitted on the vessel
   - Approved lashing arrangements
   - Cargo securing locations
   - Operational limitations
   - Types of cargo intended to be carried
   - Applicable stack weight limits and securing arrangements

   For containerships, this normally includes:

   - Securing device inventories
   - Container stack weight tables
   - Lashing plans
   - Permitted loading arrangements
   - Any approved lashing software references

   A manual may be considered inadequate if it contains only general cargo securing guidance and does not reflect the vessel's actual equipment, approved arrangements and operating limitations.

6. **If a cargo stowage arrangement used on board is not shown as an example in the CSM, can it still be accepted? What evidence should the ship provide during inspection?**

A stowage arrangement not specifically illustrated in the CSM may still be acceptable if it remains within the approved limits and securing principles of the manual.

The ship should be able to demonstrate that the arrangement:

- Falls within the approved limitations of the CSM
- Complies with the cargo securing principles contained in the manual
- Meets the applicable securing force requirements

Compliance may be demonstrated through:

- Approved lashing software
- Manual calculations carried out in accordance with the approved CSM

If the arrangement is outside the approved limits of the CSM or cannot be supported by calculations or approved procedures, Port State Control may consider this a deficiency.

7. **When carrying high-cube containers, out-of-gauge cargo or other unusually sized cargo units, what information should be included in the CSM?**

Where a vessel is intended to carry:

- High-cube containers
- Out-of-gauge cargo
- Flat racks
- Open-top containers
- Project cargoes, or
- Other unusually dimensioned cargo units

The CSM should provide appropriate guidance, limitations and securing arrangements for those cargoes.

The manual should identify any:

- Reduced stack weight limits
- Additional lashing requirements
- Loading restrictions
- Special securing arrangements
- Operational limitations

If cargoes are regularly carried but not addressed in the approved CSM, additional approval or revision of the manual may be necessary.

For containerships, any limitations associated with non-standard container dimensions should also remain consistent with the approved lashing arrangement and applicable IACS container securing requirements.

8. **How can officers demonstrate during a Port State Control inspection that they understand the CSM and the weight limits that apply to container stacks, tank tops, hatch covers and decks?**

Responsible officers should be able to:

- Locate the applicable weight limitations
- Explain what the limitations mean
- Demonstrate how the limits are used during cargo planning and loading

Officers should understand:

- Container stack weight limits
- Tier weight limitations
- Tank top loading limits
- Hatch cover loading limits
- Deck loading restrictions

Supporting evidence may include:

- Familiarization records
- Training records
- Cargo planning procedures
- SMS instructions
- Loading computer records
- Cargo planning checklists

A Port State Control Officer may question compliance if responsible officers cannot explain the applicable limitations or demonstrate how those limitations were considered during cargo planning.

9. **If weight limitations for tank tops, hatch covers or decks are not included in the CSM, where should these limits be available on board and what evidence should be presented during inspection?**

Weight limitations do not necessarily have to be included directly in the CSM.

They may instead be contained in:

- The approved Loading Manual
- An approved loading computer or loading instrument
- Other approved stability or loading documents

The vessel should ensure that these limitations are:

- Readily available on board
- Clearly identified
- Understood by responsible officers

Where appropriate, the CSM may cross-reference the approved loading documentation containing these limits.

During a Port State Control inspection, the ship should be able to demonstrate compliance by producing the relevant approved documentation and showing that the cargo loading condition remains within the approved limitations.

10. **How should ships demonstrate compliance with the updated cargo securing calculation methods in MSC.1/Circ.1623? Are cargo securing calculations approved under earlier versions of the CSS Code required to be recalculated?**

MSC.1/Circ.1623 updated the cargo securing calculation methodology contained in CSS Code Annex 13. The revised guidance introduced several enhancements, including:

- Weather-dependent lashing concepts
- A correction factor for transverse accelerations under certain high-GM conditions
- A vertical force correction factor for longitudinal sliding assessments

For semi-standardized and non-standardized cargo, CSMs approved on or after 7 December 2020 are expected to incorporate MSC.1/Circ.1623.

Regarding new approvals and revisions, cargo securing arrangements should comply with the applicable version of the IMO guidance accepted by the Administration.

In general, cargo securing calculations that were previously approved under an earlier approved standard do not require re-calculation solely because revised guidance has been issued. However, re-evaluation may be required when:

- New cargo securing arrangements are introduced
- Existing arrangements are modified
- The CSM is revised
- New cargo types are intended to be carried outside the previously approved scope

During a Port State Control inspection, the ship should be able to demonstrate that cargo securing arrangements are being used within the limits approved in the CSM.

11. **Does IACS UR C6 and UR C7 apply to my fleet?**

IACS UR C6 and UR C7 apply to ships contracted for construction on or after July 1, 2025 and are therefore not generally applicable to existing ships.

12. **If lashing software is used on board, how should it be used together with the approved CSM? What evidence should be available during a Port State Control inspection?**

Lashing software can be a valuable tool for cargo planning and verification, but it does not replace the approved CSM.

The approved CSM remains the primary document establishing:

- Approved securing arrangements
- Stack weight limitations
- Lashing requirements
- Operational restrictions

Where lashing software is carried on board, it should be consistent with the approved cargo securing basis for the vessel and be used in accordance with the ship's procedures.

For container ships, additional requirements may apply under IACS Unified Requirements C6 and C7 for vessels contracted for construction on or after July 1, 2025. These requirements establish standards for container securing arrangements and computerized lashing calculation systems.

During a Port State Control inspection, the ship should be able to provide:

- The approved CSM
- Relevant cargo plans
- Lashing software output, if used
- Supporting calculations demonstrating compliance with approved limits

Port State Control Officers will normally consider software calculations together with the approved documentation and the actual loading condition on board.

13. **How is Verified Gross Mass information to be used when checking container stack weights and securing limits, and what documents should be available during inspection?**

SOLAS requires that containers loaded for transport have a Verified Gross Mass (VGM).

The VGM values for the containers loaded should be used when:

- Preparing the cargo plan
- Determining stack weights
- Checking tier weight distributions
- Verifying compliance with the approved CSM

- Verifying compliance with any approved loading computer or lashing software

The ship should ensure that actual loading conditions remain within all approved container securing limitations.

During a Port State Control inspection, the following may be reviewed:

- Container stowage plans
- Cargo plans
- VGM records and data
- Lashing software calculations
- Loading computer output
- The approved CSM

The documentation should demonstrate that container weights used for planning match the verified weights and that all approved stack and lashing limitations have been respected.

14. Is a CSAP required?

Where applicable to vessels with keels laid after January 1, 2015, the approved CSAP should be available on board.

Port State Control may compare:

- The approved CSAP
- Actual access arrangements
- Fall protection systems
- The safe access provided to personnel carrying out container securing operations

15. What is the applicability date for CSAP requirements, and which ships are normally required to carry a CSAP?

The January 1, 2015 keel-laying criterion is applied for Chapter 5 and CSS Code Annex 14, unless the flag Administration requires otherwise.

In general, the requirements apply to ships designed and fitted for the carriage of containers on deck and constructed on or after the applicable implementation date established by the Administration.

Ship operators should verify any additional requirements issued by their Flag Administration, as some Administrations may apply specific interpretations or implementation dates.

During a Port State Control inspection, the ship should be able to demonstrate whether the CSAP requirement applies and, if applicable, provide the approved plan.

16. Do CSAP requirements apply to ships built before the implementation date or to ships that are not dedicated container ships but carry containers on deck?

The applicability of the CSAP depends on the ship's construction date, design and intended service, but it generally applies to vessels with keels laid on or after January 1, 2015.

The requirement is not limited to dedicated containerships. It may also apply to sections of other vessel types that are specifically designed and fitted for the carriage of containers on deck.

The ship should maintain documentation demonstrating the basis on which the CSAP is or is not applicable.

17. How should question 5 of the CiC be answered if the ship is not required to carry a CSAP?

If the ship is not subject to the CSAP requirements, the question may be answered as "Not Applicable (N/A)."

The basis for the answer should be supported by:

- The ship's type
- Keel-laying date
- Approved plans and documentation
- Applicable statutory requirements

During a Port State Control inspection, the ship should be able to explain why the requirement does not apply and provide supporting documentation if requested.

18. How can a ship demonstrate that it carries a sufficient number of portable cargo securing devices for its intended cargo operations? Is there a required reserve quantity that should be carried on board?

In accordance with MSC.1/Circ.1353/Rev.1, the CSM should identify the types of cargo securing devices carried on board. However, the Circular does not prescribe a specific loading condition for determining the quantity required. Accordingly, the number of portable cargo securing devices carried may vary depending on the intended cargo loading pattern and securing arrangements.

A ship should be able to demonstrate that the cargo securing devices available on board are sufficient for the cargoes and loading condition being undertaken and are consistent with the approved cargo securing arrangements contained in the CSM.

During a Port State Control inspection, the ship should be able to demonstrate that:

- The securing devices carried on board are consistent with the types and arrangements described in the approved CSM.
- Sufficient securing devices are available for the actual cargo loading pattern and securing arrangements in use.
- The quantity of securing devices carried is adequate to safely secure the cargo in accordance with the approved CSM and relevant IMO requirements.
- A reasonable number of spare devices are available to replace equipment that becomes damaged, defective, or otherwise unavailable during operations.
- Arrangements are in place to obtain additional securing devices, where necessary, due to increased cargo volumes, changes in loading plans, or voyage/route changes, and the vessel can explain how such equipment would be supplied in a timely manner.

19. Must cargo securing devices be from a specific manufacturer or brand? Can equivalent devices from different manufacturers be used, and what documents should be available to demonstrate their suitability and approval?

The important requirement is not the brand name of the equipment but that the securing devices are:

- Of an approved type
- Suitable for the intended application
- Compatible with the securing arrangement being used
- Of at least the required approved strength

Equivalent devices from another manufacturer may be used if they offer the same functionality and approved strength characteristics and are accepted under the ship's approved securing arrangement.

The use of mixed manufacturers is not automatically prohibited. However, the ship should ensure that all components used together are compatible and remain within the approved securing system.

For container ships, securing devices should remain consistent with the approved container securing arrangements, stack loading limitations and any applicable requirements contained in the approved CSM and associated approvals.

During a Port State Control inspection, the ship should be able to provide evidence such as:

- Type approval certificates
- Test certificates
- Manufacturer's documentation
- Identification markings on the equipment
- Approved revisions to the CSM reflecting the replacement or alternative devices

Port State Control Officers may verify that the securing devices fitted on board correspond to those specified in the approved securing arrangements.

20. What maintenance and inspection records should be kept for cargo securing devices? Are electronic records or Planned Maintenance System (PMS) records acceptable?

MSC.1/Circ.1353/Rev.2 recommends that ships maintain records relating to the inspection, maintenance, repair and replacement of cargo securing devices.

These records may be maintained in:

- Hard-copy record books
- Electronic record systems such as the ship's PMS

Regardless of the format used, the records should be:

- Readily available on board
- Up to date
- Traceable to the cargo securing equipment carried on the vessel per the CSM
- Documented per the vessel's SMS

The documented system should include:

- Inspection procedures
- Maintenance procedures
- Acceptance criteria
- Repair procedures
- Rejection and replacement criteria
- Records of inspections and corrective actions

During a Port State Control inspection, Port State Control Officers will normally verify both the physical condition of the equipment and the associated maintenance records.

21. When should portable cargo securing devices be removed from service? Are periodic tests or examinations required in addition to routine visual inspections?

Cargo securing devices should be removed from service whenever wear, damage, corrosion, deformation, cracking or other deterioration may affect their safe operation or strength.

Specific go/no-go discard criteria are not generally prescribed by class, and ships should follow:

- The manufacturer's recommendations
- The inspection criteria contained in the approved CSM
- Any requirements imposed by the flag Administration

Examples of defects that may require rejection include:

- Excessive wear
- Bent or distorted components
- Cracks
- Corrosion reducing strength
- Damaged threads or locking mechanisms
- Missing components

Routine visual inspections are normally expected as part of the ship's maintenance procedures.

Additional testing or periodic re-certification is generally not required unless specifically required by:

- The manufacturer
- The flag Administration
- The CSM
- Other applicable national requirements

During a Port State Control inspection, the condition of the devices should demonstrate that they remain fit for their intended service.

22. What records should be maintained to demonstrate that cargo securing arrangements are monitored and maintained throughout the voyage?

The ship should carry out cargo securing inspections and monitoring throughout the voyage in accordance with the company's cargo securing procedures documented in the SMS.

Records should normally be maintained for:

- Pre-departure cargo securing checks
- Periodic voyage inspections
- Heavy weather inspections
- Adjustments made to lashings or securing arrangements
- Any deficiencies identified and corrective actions taken

These records may be maintained in the appropriate official logbook or equivalent onboard record such as:

- Deck logbooks
- Cargo record books
- Voyage records
- Electronic record systems
- Planned Maintenance or SMS

During a Port State Control inspection, the ship should be able to demonstrate that cargo securing arrangements are actively monitored and maintained throughout the voyage and that any necessary adjustments are properly recorded.

Evidence commonly reviewed by inspectors may include:

- Logbook entries
- Inspection checklists
- Heavy weather reports
- Voyage instructions
- Records of lashing adjustments or repairs undertaken while at sea

A lack of records or evidence that cargo securing inspections were not carried out may raise concerns regarding compliance with the vessel's approved procedures and the requirements of the CSS Code.

23. How can the ship demonstrate compliance with bridge visibility requirements when the actual loading condition differs from the loading assumptions shown in the CSM? What documents should be available during a Port State Control inspection, particularly if the CSM does not include container stack height limits related to visibility?

Compliance with bridge visibility requirements is governed by SOLAS Chapter V, Regulation 22, and must be assessed based on the vessel's actual loading condition.

When evaluating compliance, the following factors should be considered:

- Actual draught and trim
- Container stack heights
- Deck cargo arrangement

The CSM may contain guidance regarding maximum stack heights and visibility assumptions. However, compliance with SOLAS V/22 is ultimately determined by the vessel's actual loading condition at the time of inspection.

Where the vessel is loaded differently from the assumptions contained in the approved plans, the ship should be able to provide supporting documentation demonstrating that bridge visibility remains compliant.

Such documentation may include:

- Approved bridge visibility plans
- Cargo or stowage plans
- Approved loading computer output

- Loading manuals
- Other approved vessel-specific documentation

Where an approved CSM does not contain sight-line-related stack height limits, its acceptability depends on the applicable approval basis. A CSM accepted under MSC/Circ.385 may remain acceptable on that basis.

However, if the actual cargo arrangement restricts bridge visibility below the limits required by SOLAS V/22, this may be considered an operational deficiency regardless of the approval basis of the CSM.

During a Port State Control inspection, officers may verify:

- Actual bridge visibility from the navigation bridge
- Cargo stowage plans
- Container stack heights
- Supporting loading and visibility documentation

24. Can heavy weather cargo securing procedures be documented in the SMS (SMS), or must they be included in the CSM? What evidence should be available during a Port State Control inspection?

CSS Code Annex 13 permits weather-dependent lashing procedures to be documented either:

- In the approved CSM, or
- In the vessel's SMS

Therefore, a separate amendment to the CSM is not necessarily required when such procedures are adequately addressed within the SMS.

The documented procedures should cover, as applicable:

- Weather monitoring
- Voyage planning considerations
- Decision-making responsibilities
- Selection of securing arrangements
- Communication procedures
- Inspection requirements
- Actions to be taken when adverse weather is encountered

During a Port State Control inspection, the ship should be able to demonstrate:

- Availability of the documented procedures
- Familiarity of responsible officers with those procedures
- Evidence that the procedures are implemented in practice

Records of voyage planning, cargo inspections and heavy weather actions may be reviewed to verify implementation.

25. If a ship's CSM was approved before the issue of MSC.1/Circ.1623 in December 2020, is the manual required to be updated to include the newer cargo securing provisions?

There is no general retroactive requirement for ships with CSMs approved before December 2020 solely because updated cargo securing guidance has been issued.

However, an update may be required when:

- New cargo securing arrangements are introduced
- Existing arrangements are modified
- New cargo types are carried that were not previously covered
- Weather-dependent lashing methodologies are introduced for semi-standardized or non-standardized cargoes

The ship should ensure that its approved CSM remains suitable for the cargoes and securing arrangements currently being used.

26. If reduced acceleration values are used based on forecast weather and sea conditions, what documentation should be available to demonstrate compliance during an inspection?

CSS Code Annex 13, paragraph 7.1.5 permits the use of weather-dependent securing arrangements under specified conditions.

Where reduced acceleration values are used, the ship should be able to demonstrate:

- The weather or wave information used in the assessment
- The associated cargo securing calculations
- The operational procedures governing the use of weather-dependent lashing.

Supporting documentation may include:

- Approved CSM
- Supporting calculations
- Voyage-specific weather forecasts
- Wave height data
- Lashing calculations
- SMS procedures addressing weather-dependent operations

During a Port State Control inspection, officers may verify that the securing arrangement used for the voyage is consistent with the approved methodology and operational procedures.

27. If a bulk carrier occasionally carries containers, project cargo or other cargo units subject to SOLAS cargo securing requirements, what type of CSM is expected?

When a bulk carrier carries cargo units subject to SOLAS VI/5 or SOLAS VII/5, the vessel should have a ship-specific CSM covering those cargoes.

This does not necessarily require a full containership-style Rev.2 manual, but the manual should contain sufficient guidance for the cargoes actually carried and should address:

- Securing arrangements
- Cargo limitations
- Cargo securing equipment
- Applicable calculation methods

The level of detail should be appropriate for the cargoes being transported and acceptable to the Administration.

28. How should container-specific inspection questions be answered on bulk carriers that do not normally carry containers?

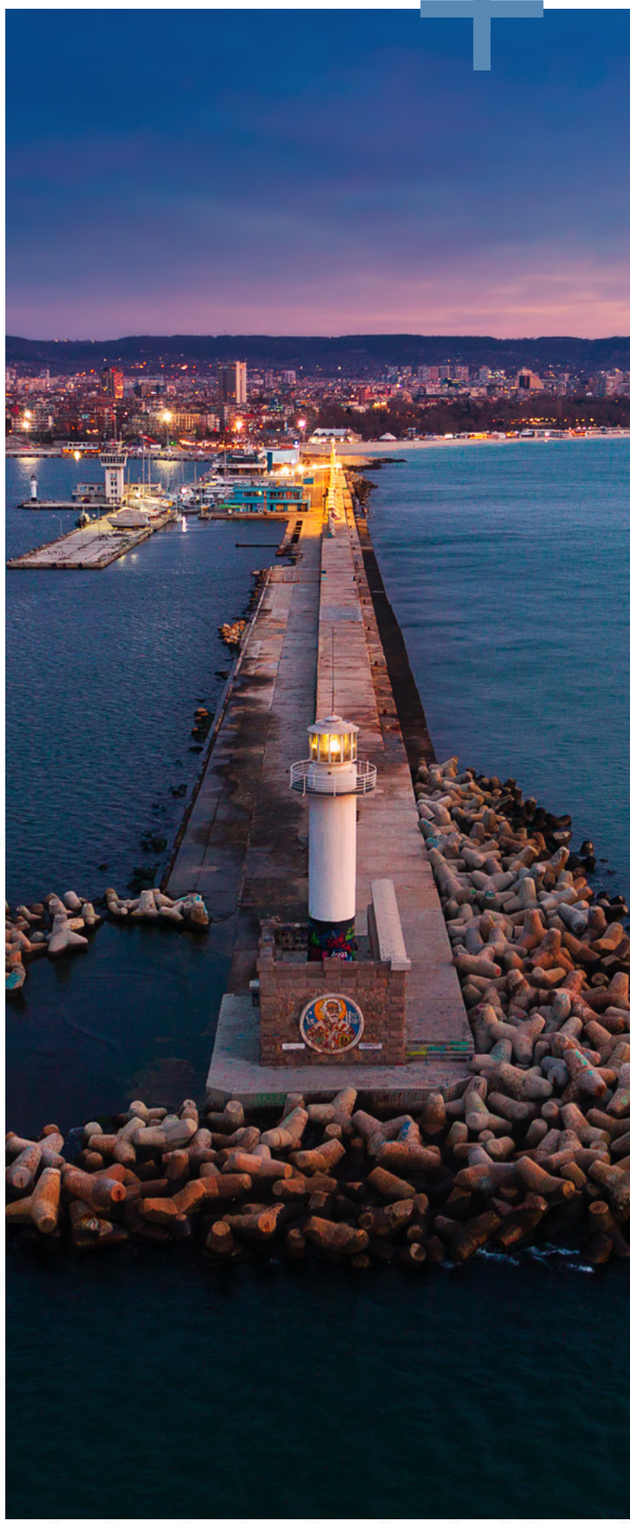
Container-specific questions may be answered "Not Applicable (N/A)" where container carriage is not part of the vessel's approved cargo securing arrangements or intended service.

However, if the vessel carries containers or other cargo units requiring compliance with SOLAS cargo securing requirements, the relevant sections of the Port State Control inspection campaign may become applicable.

The approved CSM should support the basis for any "N/A" responses.

29. For roll on/roll off (ro/ro) ships, should the CSM reference MSC.479(102) instead of Resolution A.581(14)? Are existing manuals required to be revised solely because of this change?

The ro/ro section of the CSM should reference MSC.479 (102) in place of A.581(14), with A.533(13) also referenced as applicable. However, there is no general requirement to amend or re-approve an existing CSM solely because it cites A.581(14).



30. What information should be shown in CSM drawings for fixed securing points on ro/ro ships?

The CSM should contain arrangement drawings showing the fixed securing points used for cargo securing.

The drawings should identify, as applicable:

- Locations of securing points
- Maximum Securing Load (MSL) values
- Longitudinal spacing between securing points
- Transverse spacing between securing points
- Relevant deck arrangements

This information allows ship personnel to select appropriate securing arrangements and verify compliance with approved limitations.

31. How should ro/ro passenger ships demonstrate that cargo securing arrangements consider the effects of vessel heel after damage or flooding?

For ro/ro passenger ships, cargo securing arrangements should be established taking into account the applicable ship motions and heel angles associated with the vessel's approved design and damage stability requirements.

Evidence is normally contained within:

- The approved CSM
- Associated approval documentation
- Supporting design documentation, where applicable

During a Port State Control inspection, the vessel should be able to produce the approved documentation demonstrating that the cargo securing arrangements were established in accordance with the applicable approval criteria.

32. How should container-specific inspection questions be answered on ro/ro or roll on/roll off passenger (ro/pax) ships carrying vehicles, trailers and other wheeled cargo units?

Where the vessel carries only vehicles, trailers, roll trailers and similar cargo units, purely container-specific inspection questions may normally be answered "Not Applicable (N/A)."

However, if containers are also carried under the vessel's approved arrangements, the relevant container-related requirements and inspection questions may apply.

The approved CSM should provide the basis for determining which questions are applicable.

See comments in question 30 for further details.

33. When can inspection questions be answered, "Not Applicable (N/A)" and what evidence should be available to support that answer during a Port State Control inspection?

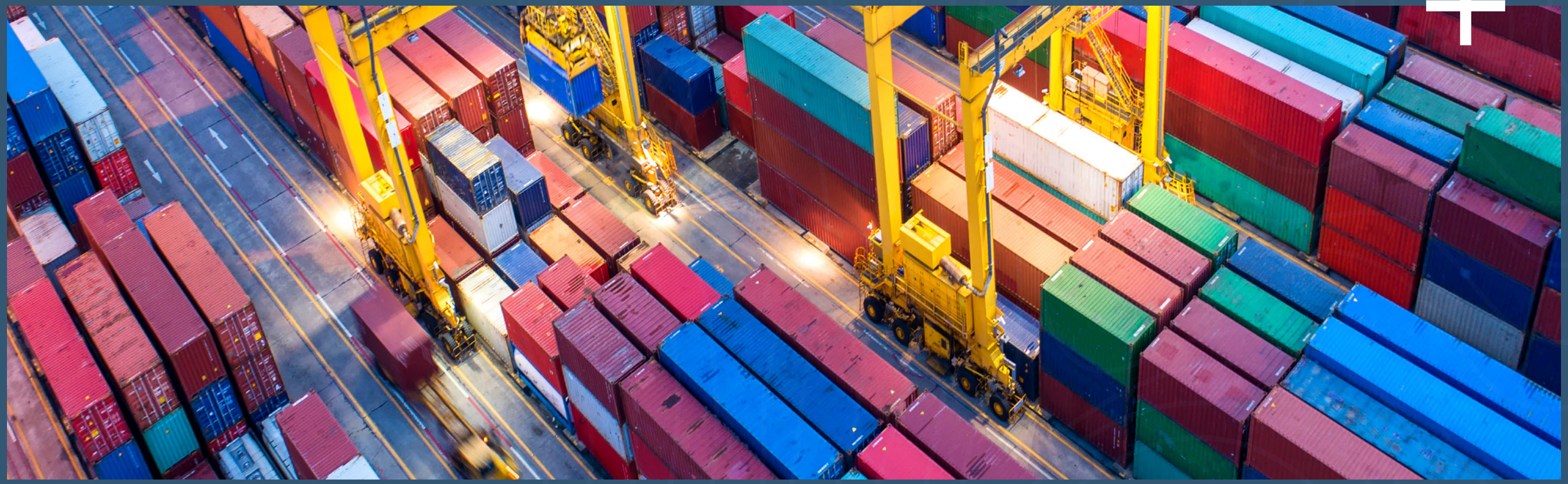
A Port State Control inspection question should only be answered "Not Applicable (N/A)" when the requirement genuinely does not apply to the vessel's approved design, cargo securing arrangements or intended service.

The basis for the response should be supported by:

- The approved CSM
- Vessel type and design
- Approved plans and documentation
- Intended cargo operations
- Applicable statutory requirements

For example, a vessel that is not designed, fitted or approved to carry containers may appropriately answer container-specific questions as "N/A."

During a Port State Control inspection, the ship should be prepared to demonstrate why the requirement does not apply by reference to its approved documentation and operational profile.



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