



Mr. Luc Smulders
Secretary General
Paris Memorandum of Understanding on Port State Control (Paris MoU)
Rijnstraat 8
2515 XP The Hague
The Netherlands

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Dear Secretary General

PORT STATE CONTROL OF PARIS MOU

In writing, I wish to congratulate all that the PSC MOU has achieved over the years on safety of life at sea, prevention of pollution and the living and working conditions on board ships since it entered into force on 1 July 1982. Since that date, the Paris Memorandum has been amended on a number of occasions to accommodate new safety and marine environment requirements and, in particular, requirements related to the working and living conditions of seafarers. The administration of STCW has been changed with significantly more administrative paperwork put on seafarers and this has not been taken into account with the minimizing of the “minimum manning requirements” onboard ships.

At a recent meeting of the Executive Council of IFSMA, over which I preside, the issue of PSC Officers visits to ships was discussed at some length following reports of concerns from an increasing number of Shipmasters. You will be well versed that Shipmasters must ensure they comply with MLC 2006 working hours for their crew and it is indeed part of a PSC Officer's inspection to ensure compliance, with non-compliance leading to possible detention of the ship.

It has come to my Executive Council's attention that the majority of the concerns expressed by Shipmasters is that PSC officers have a tendency to visit the ship soon after its arrival in port and on occasions before the ship's agent boards the vessel. These visits not only include the Inspection, but also the occasional safety drill such as abandon ship and lowering of life boats and rescue boat within a designated timescale. It is well known that when ships arrive in port, many are tired and suffering from fatigue and the Shipmaster has to relieve many of the crew from their duties to ensure that they comply with the MLC hours of rest of 6 hours in any 10 hour period without interruption. The early arrival of PSC Officers is in itself causing Shipmasters to break the very regulations they come to inspect and when the crew are tired before they even start the subsequent drill leading to mistakes and increased concerns of their safety.

I believe that PSC Officers feel that by visiting the ships early they are trying to assist the ships in not interrupting the very time pressurised harbour routine, but their early arrival causes significant problems with unintended consequences.

International Federation of Shipmasters' Associations

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The Paris MOU Administration has issued a code of good practice for PSC Officers which provides guidelines on the standards of integrity, professionalism and transparency, and co-operating members are invited to apply the Code. The Port State Control Committee, as the Executive Body of the Paris MOU has, I understand, the authority to modify the code.

It is therefore proposed that consideration be given to providing new guidance and advise PSC Officers to not board a ship to carry out their inspections until at least 6 hours after the ship has berthed. This would enable some crew, but not all, the required rest hours to perform more safely and to a higher standard of professionalism and cooperation.

I look forward to reading your reply.

Yours Sincerely

Captain Hans Sande
President
Federation of International Shipmasters' Associations