31 July 2018

Marine Advisory: 06/2018

SUBJECT: Australia - Facilitating Compliance Without PSC Attendance

To: Owners and Operators and Masters

The Liberian Administration has been working closely with the Australian Maritime Safety Authority (AMSA) to develop a program intended to facilitate compliance verifications of Liberian flagged vessels calling at Australian ports without AMSA attendance.

AMSA has agreed to let the Liberian Administration take the lead on any vessel inspection, provided the Master, owner, or operator:
1. Notifies the Administration in advance of the vessel’s arrival
2. Includes a report of any safety concerns
3. Confirms Liberian inspector attendance

The Administration can then assist with arranging the flag inspection, at a reduced cost to owners and operators if outside the normal ASI window, and working with the operator to notify AMSA of the actions and plan for repair (if necessary).

AMSA recommends using their form AMSA 355 to submit any safety concerns; examples are listed in Appendix I, attached. The form is available via Word document, PDF, or as a web form. To ease the burden of reporting, Master’s may also submit form AMSA 355 to the Administration in place of the Pre-Arrival Checklist.


AMSA has also informed us that they find a PSC detention is not an adequate deterrent regarding MLC issues and has started banning vessels for 12 months for noncompliance with MLC.

For further information regarding the issuance of this Advisory, please contact the Safety Department at +1 (703) 790 3434 or safety@liser.com.

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**Notification**
- Submit Arrival Notification
- Include Report of any Issues (Pre-Arrival Checklist and/or AMSA 355)

**Scheduling**
- Administration and Master/Owner/Operator Schedule Inspection

**Reporting**
- Administration and Master/Owner/Operator report actions to AMSA and plan for repair (when necessary)
Appendix I: Examples of marine safety concerns include:

Substandard conditions

- Substandard condition of the hull or other plating
- Substandard condition of hatches, water tight doors or openings
- Substandard condition of machinery or steering systems
- Substandard condition of cargo handling equipment

Unsafe working conditions

- The vessel having unsafe handling characteristics
- Unsafe navigation
- Unsafe bridge procedures
- Unsafe engine control room procedures
- Unsafe engineering operational procedures or practices
- Unsafe engineering maintenance procedures or practices
- Unsafe pilot access (for example, pilot ladders)
- Unsafe cargo stowage
- Crew schedules that result in fatigue

Modifications to equipment and procedures

- Bypassing of safety procedures because of operational or commercial pressures
- Deviation from established collision avoidance procedures
- A modification of the vessel’s equipment or fittings that has not been approved by the appropriate authority

Inadequate planning and equipment

- Inadequate passage planning
- Inadequate navigational equipment, charts or publications
- Inadequately marked obstructions to safe navigation
- Lack of traffic, weather, or security information

Maritime Labour Compliance

- Inadequate rest hours
- Wages not paid on time
- Lack of sufficient stores