



Memo No. TDM007-2024

To: Owners, ISM Operators, Deputy Registrars, ROs and GSIs

Re: Enhancement of the General Safety Inspection Program – Paris MoU

Date: 23 December 2024

The International Merchant Marine Registry of Belize (IMMARBE) regularly evaluates the fleet's performance within various Port State Control (PSC) MoUs. Unfortunately, we have observed a significant rise in our detention rate in the Paris MoU region. This troubling trend has adversely affected our standing across several major MoUs, highlighting the urgent need for enhanced measures to ensure compliance and improve the safety standards of our vessels

BACKGROUND

As part of the commitment of the Government of Belize as a Member State to the IMO and in full compliance with the III Code in its Part 2 “Flag State” specifically in items 28 to 37, IMMARBE has established a set of requirements for the Flag State Surveyors.

These requirements were formalized when the General Safety Inspection Program was re-established on 1 March 2024 with the aim to assist in exiting from the Blacklist within the Paris and Tokyo MoU, regrettably there are some areas/ports that presently affects our efforts and requires a more dedicated approach.

The Paris MoU plays a crucial role in ensuring maritime safety and environmental protection across the waters of the European coastal States and the North Atlantic basin, extending from North America to Europe. Its mission to eliminate the operation of sub-standard ships through a harmonized system of port State control is vital for the integrity of global shipping operations.

The Paris MoU operates on the principle that the primary responsibility for compliance with maritime regulations lies with the shipowner/operator. This shared responsibility fosters a culture of accountability and encourages shipowners to prioritize safety and compliance.

The performance of flag States is critically assessed through the Paris MoU's Flag State performance list, which serves as a worldwide reference. A strong performance on this list is essential for maintaining credibility and trust among stakeholders.

It is imperative for stakeholders, including shipowners, operators, and flag States, to maintain good performance and avoid falling within the Black List of the Paris MoU. A poor



standing can lead to increased inspections, operational delays, and damage to reputation, which can significantly impact business operations.

PROBLEM

Regardless of the efforts placed to mitigate the number of PSC Detentions, unfortunately Belize-registered ships continue to have a negative impact in the Paris MoU.

This impact clearly reflects a significant increase in PSC detentions resulting in a detention rate of 19.54%. Additionally, to this overall increment, it was identified that Italy possessed the 35.29% of our detentions in the region. The below table reflects this trend during the past 5 years.

| YEAR | INSP. | DET. | DET. RATIO | EXCESS FACTOR | ITALY DET. | ITALY % |
|------|-------|------|------------|---------------|------------|---------|
| 2020 | 77 | 5 | 6.49 | 0.45 | 2 | 40.00 |
| 2021 | 66 | 6 | 9.09 | 0.68 | 0 | 0.00 |
| 2022 | 53 | 6 | 11.32 | 0.82 | 1 | 16.67 |
| 2023 | 80 | 9 | 11.25 | 0.90 | 5 | 55.56 |
| 2024 | 87 | 17 | 19.54 | 3.01 | 6 | 35.29 |

It is evident that a solution to reduce the number of PSC Detentions is required if we expect to return to the Grey List promptly.

PARIS MoU GENERAL SAFETY INSPECTION PROGRAM

Considering the challenging status of the Belize flag in the Paris MoU, the International Merchant Marine Registry of Belize decided to enhance the General Safety Inspection Program on those ships operating or intending to operate within the Paris MoU Region.

This new approach will consist of:

1. All Ships operating or intending to operate in the Paris MoU area will be subject to two General Safety Inspections in a period of 12 months.
2. All ships scheduled to call any Italian Port must perform a General Safety Inspection before arrival.
3. All deficiencies identified by the General Safety Inspector must be rectified before departure from the port of inspection, unless authorized by IMMARBE's Technical Department upon submission of a formal request to technicalservices@immarbe.com.



4. A Rectification Report shall be sent to IMMARBE's Technical Department using the TDF-020-Monitoring and Correction of Deficiencies for GSI. This report is to be submitted along with evidence (document, photo, video, etc.) of the rectification of each deficiency.

STATEMENT OF AUTHORIZATION

Any Belize registered ship operating or intended to operate in the Paris MoU region must apply for a Statement of Authorization.

1. Ships inspected in the last 90 days from the date of effect of this Memo can apply without the performance of a new inspection. The Statement will be valid for a supplementary 90 days from the date of issuance.
2. Ships not falling under above criteria wishing to continue operating or intending to operate in this region must arrange a General Safety Inspection as soon as possible in order to obtain the Statement of Authorization to continue operating or to be authorized to operate within the Paris MoU area.
3. For those vessels intended to call Italy, a single Authorization will be requested/issued authorizing this call subject to satisfactory completion of the General Safety Inspection prior arrival and proper rectification of any deficiency found.
4. If a ship is found with a deficiency, the same shall be rectified immediately at the port of inspection in order to be eligible to obtain the Statement of Authorization. If the deficiency cannot be rectified immediately, a formal request is to be sent to IMMARBE Technical Department who will determine if a period can be granted or not. If so, the Statement of Authorization will be granted for the period agreed and upon confirmation of the rectification, the period will be extended for the remainder of the 6 months.
5. One month before the expiration of the Statement of Authorization, the Owner or ISM Operator shall arrange a new General Safety Inspection in order to have this document renewed.

Any ship not in possession of a Statement of Authorization cannot operate within the Paris MoU region or call any Italian Port. If a vessel is found not in compliance with this requirement, the same will be subject to disciplinary action in accordance with our Statutory Instrument 56 of 1999.



ACTION REQUESTED

IMMARBE strongly urges all Shipowners/ISM Operators, Recognized Organizations, Recognized Security Organizations and General Safety Inspectors to carefully review the contents of this Memo and take immediate action until revoked or superseded by this Administration to ensure its provisions are implemented effectively.

DISCIPLINARY MEASURES

The measures outlined above are preventative actions implemented by the Administration to minimize ship detentions.

All operators and masters are expected to thoroughly review this notice and ensure its full implementation on board. Your cooperation is essential for enhancing fleet performance and maintaining compliance with Port State Control (PSC) requirements.

Failure to adhere to the requirements outlined in this notice or providing false information, as identified during inspections by Port State Control Officers (PSCO), may result in disciplinary actions by IMMARBE. These actions may include, but are not limited to:

- a. Suspension or revocation of the vessel's certification.
- b. Imposition of fines or penalties.
- c. Restrictions on the vessel's operations or trading activities.
- d. Other legal measures as outlined in the Belize Merchant Ships (Registration) Act (latest revision) and Statutory Instrument 56 of 1999 (as amended).

The Flag Administration looks forward to your continued cooperation and commitment to ensuring the effective implementation of this system.

Eng. Eduardo Simon
Technical Manager
International Merchant Marine Registry of Belize

