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To: All Shipowners, Ship Managers, Ship Masters and Classification Societies

Dear Sirs/Madams,

Some Frequently Asked Technical Information / Requirements for Hong Kong Registered Cargo Ships

This circular letter addresses a number of technical issues, requirements involving Life-Saving Appliances, Fire Fighting Apparatus, Radio and Navigational Equipment, STCW matters, etc. for Hong Kong Registered Cargo Ships.

The following is a list of technical issues frequently asked by the industry.

1. Portable fire extinguishers

IMO Resolution A.951(23), paragraph 9.1.1

- (1) Portable fire extinguishers should be examined annually by a competent person; (A competent person may be taken as Chief Officer, Second Engineer or above).
- (2) Each portable fire extinguisher should be attached with a tag indicating that it has been examined;
- (3) CO₂/Halon Portable fire extinguishers should not be located in accommodation spaces;
- (4) At least one portable fire extinguisher of each type manufactured in the same year and kept on board a ship should be test discharged at five yearly intervals (as part of a fire drill).

2. Spare charges for portable fire extinguishers
IMO MSC/Circ.847, paragraph 6.2

For portable fire extinguishers of the same type, capable of being recharged on board, the spare charges should be provided as follows:

- (1) 100% for the first ten portable fire extinguishers and 50% for the remaining portable fire extinguishers but not more than 60; and
- (2) For portable fire extinguishers that cannot be recharged by the crew, additional portable fire extinguishers of the same quantity, type, capacity and number as determined in (1) above should be provided in lieu of spare charges.

3. Testing for portable fire extinguishers
IMO MSC/Circ.847, paragraph 6.5

Containers of permanently pressurized portable fire extinguishers and propellant bottles of non-pressurized portable fire extinguishers should be hydraulic pressure tested as follows by a competent service station recognized by a Recognized Organization:

- (1) Powder type portable fire extinguishers every 10 years;
- (2) CO₂ type portable fire extinguishers every 10 years;
- (3) Other type portable fire extinguishers every 10 years; and
- (4) Containers of non-permanently pressurized portable fire extinguishers should be hydraulic pressure tested every 10 years.

4. Maintenance and inspection of fixed carbon dioxide fire extinguishing system
http://www.mardep.gov.hk/en/pub_services/pdf/clsolas100318.pdf
IMO MSC/Circ.1318, paragraph 6.1.2

All Hong Kong registered ships shall carry out maintenance and inspection of fixed carbon dioxide fire extinguishing systems in accordance with IMO MSC/Circ.1318. At each intermediate, periodical or renewal survey in cargo ships, high pressure cylinders should be subjected to periodical tests at intervals not exceeding 10 years. At the 10-year inspection, at least 10% of the total number provided should be subjected to an internal inspection and hydrostatic test by a competent service station recognized by a Recognized Organization.

5. Controls for fixed carbon dioxide fire extinguishing system
FSS Code, Chapter 5, paragraph 2.2.2

Carbon dioxide systems shall comply with the following requirements:

- (1) Two separate controls shall be provided for releasing carbon dioxide into a protected space and to ensure the activation of the alarm. One control shall be used for opening the valve of the piping which conveys the gas into the protected space and a second control shall be used to discharge the gas from its storage containers; and
- (2) The two controls shall be located inside a release box clearly identified for the particular space. If the box containing the controls is to be locked, a key to the box shall be in a break-glass-type enclosure conspicuously located adjacent to the box.

6. Foam fire-extinguishing systems

IACS Recommendation No.53-2

IMO MSC/Circ. 1312, MSC/Circ.670 and MSC/Circ.798

Fixed foam extinguishing systems should be inspected every two years by a competent service station recognized by a Recognized Organization. Foam sample analysis shall be carried out after a period of 3 years after being supplied to the ship and thereafter every year at authorized service agent or manufacturer's laboratory. A record of the age of the foam concentrates and of subsequent controls should be kept onboard.

7. Air cylinders for self contained breathing apparatus (SCBA)

IMO MSC/Circ.850, paragraph 8

IACS Recommendation No.88

SCBA air cylinders shall be examined at least annually by a competent service station recognized by a Recognized Organization. SCBA cylinders should be hydraulic pressure tested at intervals not exceeding 5 years and the hydrostatic test date must be permanently marked on the bottles. Two spare charges suitable for use with the breathing apparatus should be provided for each SCBA. If cargo ships are equipped with suitably located means for fully recharging the air cylinders free from contamination, only one spare charge is required for each required SCBA.

8. Air bottles for air supply in totally enclosed lifeboats

IACS Recommendation No.88

Air bottles for air supply in totally enclosed lifeboats should be hydraulic pressure tested by a competent service station recognized by a Recognized Organization at intervals not exceeding 5 years and the hydrostatic test date must be permanently marked on the bottles.

9. Medical oxygen cylinders

Cap. 295B, regulation 66

Hydrostatic pressure testing of cylinders shall be carried out by a competent service station recognized by a Recognized Organization at the intervals not exceeding 5 years and the hydrostatic test date must be permanently marked on the bottles.

10. IMSBC Code

Statement of compliance for IMSBC Code certification would be issued under the agreement between shipowner and classification society and would not be issued on behalf of HKSAR.

11. Remotely located survival crafts

IACS unified interpretation SC 213

IMO MSC/Circ.1243

Liferafts, if located at the aft/forward end of the ship and at a distance of more than 100m from the closest survival craft, as required by SOLAS regulation III/31.1.4, should be regarded as "remotely located survival craft" with regards to SOLAS regulation III/7.2.1.2.

Following requirements are to be applied to all HK cargo ships regardless of date of construction.

- (1) A minimum number of 2 lifejackets and 2 immersion suits;
- (2) Adequate means of illumination, complying with SOLAS regulation III/16.7, either fixed or portable, which shall be capable of illuminating the liferaft stowage position as well as the area of water into which the liferaft should be launched. Portable lights, when used, shall have brackets to permit their positioning on both sides of the ship; and
- (3) An embarkation ladder or other means of embarkation enabling descent to the water in a controlled manner * in accordance with SOLAS regulation III/11.7.

* Controlled manner : A knotted rope is not acceptable for this purpose.

12. Periodic servicing and maintenance of lifeboats launching appliances & on-load release gear

http://www.mardep.gov.hk/en/pub_services/pdf/clsolas060904.pdf

In accordance with the IMO MSC/Circ.1206/Rev.1, ship management company should employ the manufacturer or a person appropriately trained and certified by the manufacturer to carry out the annual servicing and maintenance of lifeboats, launching appliance and on-load release gear. However, there are practical difficulties that ship management company may not be able to source the manufacturer certified facilities or personnel to carry out the servicing and maintenance work. This Administration would accept a service provider to carry out these functions, provided that the following conditions are complied with.

- (1) The service provider should be a firm engaging in ship repair/maintenance business, and should have adequate track record to prove that it has sufficient expertise and experience in inspection, repair, testing and maintenance of lifeboats, launching appliances and on-load release gear and should be authorized under the provision of IMO MSC/Circ.1277 by a Recognized Organization;
- (2) When carrying out servicing and maintenance, the service provider should follow the Guidelines as stated in the Annex 1 and the Specific procedures as stated in the Appendix of IMO MSC/Circ.1206/Rev.1;
- (3) The five-yearly dynamic operational test of the winch brake should be witnessed by and conducted to the satisfaction of the attending Recognized Organization's surveyor; and
- (4) Upon completion of the services, reports and records as stated in paragraph 13 to 15 of Annex 1 of IMO MSC/Circ.1206/Rev.1 should be properly maintained onboard.

13. Lifeboat turnout

SOLAS regulation III/20.7

SOLAS regulation III/20.7 requires that all lifeboats, except free-fall lifeboats, shall be monthly turned out from their stowed position, without any person onboard if weather and sea conditions so allow.

14. Lifeboat drill

IMO MSC/Circ.1206/Rev.1, annex 2, paragraph 2.3.2

When performing drills with persons on board a lifeboat, it is recommended that the lifeboat first be lowered and recovered without persons on board to ascertain that the arrangement functions correctly. The lifeboat should then be lowered into the water with only the number of persons on board necessary to operate the boat.

15. Freefall lifeboat drill

IMO MSC/Circ.1206/Rev.1, annex 2, paragraph 2.4.2

When the lifeboat is free-fall launched as part of a drill, this should be carried out with the minimum personnel required to manoeuvre the boat in the water and to recover it. The recovery operation should be carried out with special attention, bearing in mind the high risk level of this operation. Where permitted by SOLAS, simulated launching should be carried out in accordance with the manufacturer's instructions, taking due note of the Guidelines for simulated launching of free-fall lifeboats at appendix as stated in the IMO MSC/Circ.1206/Rev.1.

16. Lifeboat fall preventer device

IMO MSC/Circ.1327

A "Fall Preventer Device" (FPD) can be used to minimize the risk of injury or death by providing a secondary alternate load path in the event of failure of the on-load hook or its release mechanism or of accidental release of the on-load hook. However, FPDs should not be regarded as a substitute for a safe on-load release mechanism. If FPDs are provided, they must be designed, installed, inspected and utilized in accordance with the manufacturer instruction and complied with IMO MSC/Circ.1327. The ship's operating crew should be familiar with the operation of the FPD fitted to the lifeboat on their ship. The procedure to be followed should be contained in the ISM Code documentation and the ship's training manual.

17. Falls used in launching life saving appliances

Code of safe working practices for merchant seaman, annex 20.1

Wire rope grips "bulldog grips" are not accepted. Where wire rope grips "bulldog grips" are found to have been used on primary load-bearing terminations, arrangements are to be made by the operators to have them replaced wedged socket etc.

18. Medical Stores

A cargo ship registered in Hong Kong is required to have onboard medicines or medical stores in accordance with the scales set out in the Schedule(s) detailed in the following link: http://www.legislation.gov.hk/blis_ind.nsf/e1bf50c09a33d3dc482564840019d2f4/1d3061bc86bec35482564ac0008b64d?OpenDocument

Alternative supply of medical stores in accordance with the scales specified under the HKMSIN No. 57/2006 is also acceptable to Marine Department.

19. Acceptance of material and equipment

HKMSIN No. 32/2009, paragraph 8

HKMD accepts materials and equipments complying with test procedures/standards and performance specifications laid down by IMO. In general, materials and equipments approved by a maritime authority for use on its registered ships or approved by the authorized Recognized Organization or Recognized Security Organization of HKMD are acceptable to be used on cargo ships registered in Hong Kong.

20. GMDSS radio installations operation and maintenance

http://www.mardep.gov.hk/en/pub_services/pdf/clpsc071127.pdf

Test on DSC radio installations must be completed with reception acknowledgement so that the effectiveness of the equipment could be ensured. If no acknowledgement is received despite of numerous tests, it should be recorded in the radio logbook and the shore engineer should be called upon to check the effectiveness of the DSC radio.

21. Dispensation for shipboard crew

Article VIII of STCW Convention

Dispensation for a Master or a Chief Engineer will never be granted except in circumstances of force majeure in accordance with STCW Article VIII.

22. Application evidence for certificate of endorsement

The "Consolidated Application for the Issue of Hong Kong Licence(s)" is the official acknowledgement and is issued in accordance with paragraph 5 of STCW regulation I/10. The officers is allowed to serve on Hong Kong registered ship(s) in the indicated or lower for three months pending the issue of the Hong Kong Licences under STCW I/2 paragraph 5. The fax copy of the "Consolidated Application for the Issue of Hong Kong Licence(s)" serves the purpose of documentary proof and there is no mandatory requirement to have original copy onboard for this official acknowledgement.

23. Annual Performance Test of AIS

IMO MSC/Circ.1252

To carry out annual performance test of AIS in accordance with the IMO MSC/Circ.1252 by a qualified radio inspector of an approved radio firm, and to retain the "AIS Performance Test Report" issued by the radio firm on board the ship.

24. Annual Performance Test of EPIRB

IMO MSC/Circ.1040

To carry out annual performance test of EPIRB in accordance with the IMO MSC/Circ.1252 by a qualified radio inspector of an approved radio firm, and to retain the "EPIRB Performance Test Report" issued by the radio firm on board the ship.

25. Annual Performance Test of VDR/S-VDR
IMO MSC/Circ.1222

To carry out annual performance test of VDR/S-VDR in accordance with the IMO MSC/Circ.1222 by a qualified radio inspector of an approved radio firm, and to retain the "VDR/S-VDR Performance Test Report" issued by the radio firm on board the ship.

26. PSC inspection on rest hours of work/rest
http://www.mardep.gov.hk/en/pub_services/pdf/psc_insp.pdf

This circular serves to draw particular attentions of all Hong Kong shipowners, ship managers and shipmasters to observe the requirements of hours of work/rest under the STCW Convention and recommend using IMO/ILO model formats for the maintenance of records of hours of work and rest periods.

27. Port State Control
HKMSIN No. 31/2009, paragraph 12

In the event of a Hong Kong registered ship being detained as a result of PSC intervention, the shipmaster or owner should immediately:

- (1) Forward a copy of the PSC inspection report (i.e. FORM A and FORM B), stating when, where and by whom the ship has been detained, to this Department; and
- (2) Contact the local office(s) of the ship's Classification Society and/or the ship's SMC classification Society and/or the ship's ISSC Recognized Security Organization to arrange an inspection and/or audit for confirmation of the deficiencies and/or non-conformities, and other necessary remedial action as directed by the port State.

28. Emergency escape breathing device (EEBD)
IACS Recommendation No.88
IMO MSC/Circ.849

At least two (2) EEBDs should be provided in accommodation spaces.

EEBDs should be provided in machinery spaces for category A containing machinery used for main propulsion as stated below:-

- (1) Machinery spaces of category A containing machinery used for main propulsion:
 - (a) One (1) EEBD in the engine control room, if located within the space.
 - (b) One (1)EEBD in workshop areas, if there is, however, a direct access to an escape way from the workshop, an EEBD is not requirement.
 - (c) One (1)EEBD on each deck or platform level near the escape ladder constituting the second means of escape from the machinery space (the other means being an enclosed escape trunk or watertight door at the lower level of the space).
- (2) In machinery spaces of category A other than those of above (1):
One (1) EEBD, as a minimum, on each deck or platform level near the escape ladder other than a fire shelter, an escape trunk or a watertight access door to safe spaces.

At least two (2) sets of spare EEBDs shall be provided onboard either in the area of navigation bridge, fire control station or storage room.

Emergency Escape Breathing Devices shall be examined at least annually by suitably qualified ship' staff, or by a competent service station recognized by a Recognized Organization. Hydrostatic testing of EEBD shall be carried out in accordance with the recommendation from manufacturer.

29. Immersion suits

IMO MSC/Circ.1114, Annex, paragraph 3

- (1) An immersion suit of an appropriate size shall be provided for every person on board,
- (2) At least two (2) immersion suits of an appropriate size at the bridge,
- (3) At least two (2) immersion suits of an appropriate size at the engine control room,
- (4) At least two (2) immersion suits of appropriate size for additional forward liferaft fitted,

To ensure the maintenance of adequate strength and watertightness of seams and closures of immersion suits and anti-exposure suits with age, each suit is subjected to an air pressure test at intervals not exceeding three years, or more frequently for suits over ten years of age.

Should you have any queries in respect of the content of this circular letter, please feel free to contact Senior Surveyor/Cargo Ships Safety Section at

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Yours faithfully,



(S.H. Tse)

Senior Surveyor/Cargo Ships Safety Section
for Director of Marine