

RUSSIAN MARITIME REGISTER OF SHIPPING



APPROVED

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Procedure
for Prevention of Ship Detentions and Arrangement of Surveys Based
on Results of Port/Flag State Ship Inspections
ND No. 2-120104-001-E

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Annotation

As compared to the previous edition approved on 05.03.2022, this Procedure has been amended in accordance with the Order No.33 of 23.06.2022 'On amendments being made to the RS HO structure' (subject to additions, approved by Order No.36 of 11.07.2022), and paras 5.4.2, 6.2.2.5, 6.3.6, 6.5.2 and 7.1.2 have been brought in line with the established practice.

1 Scope of application

1.1 This Procedure for Prevention of Ship Detentions and Arrangement of Surveys Based on Results of Port/Flag State Ship Inspections (hereinafter, the Procedure) establishes the stages and procedure to prevent ship detentions, process information on the results of port/flag state ship inspections as well as measures to reinforce the prestige and image of the RS as internationally recognized organization.

1.2 This Procedure is a normative document for Deputy Director General for Ships in Service (002), Divisions 340 and 410, RHO Departments 355 and 602, RS Branch Offices 100 (except for 110, 125) and 200 (except for 250, 273).

1.3 This Procedure is developed both in Russian and English, the original of the document is maintained in the electronic form.

2 Normative references

2.1 While developing this Procedure, the requirements of the following normative documents have been taken into account:

- 1) ND No. [1-0227-008-E](#) – IACS Procedural Requirement No.8;
- 2) ND No. [1-0227-017-E](#) – IACS Procedural Requirement No.17;
- 3) ND No. [2-010105-010-E](#) – Regulations on Expertise and Analysis Centre;
- 4) ND No. [2-020101-012-E](#) – Rules for the Classification Surveys of Ships in Service;
- 5) ND No. [2-020101-147-E](#) – Rules for the Classification and Surveys of Small Craft;
- 6) ND No. [2-030101-009-E](#) – Guidelines on Technical Supervision of Ships in Service;
- 7) ND No. [2-049901-001](#) – Procedure for Application of RS Documents Forms Drawn Up During Technical Supervision;
- 8) ND No. [2-060101-001-E](#) – Quality Manual;
- 9) ND No. [2-060102-002-E](#) – Procedure for RS Performance Evaluation and Improvement;
- 10) ND No. [2-060201-025-E](#) – Procedure for Technical Supervision of Ships in Service;
- 11) ND No. [2-080101-012-E](#) – Guidelines on Certification of the Safety Management Systems in Compliance with the Requirements of the International Safety Management (ISM) Code and of the Ships in Compliance with the Requirements of the International Code for the Security of Ships and Port Facilities (ISPS Code).

3 Terms. Definitions. Abbreviations

The terms, definitions and abbreviations used in this Procedure are given in ND No. 2-060101-001-E – Quality Manual, and in normative documents on which this document is based. Additionally, the following abbreviations are used in this Procedure:

MA – Administration, Flag State Maritime Administration of the ship;

RSR – RS responsibility.

4 Introduction

4.1 Data on results of Port State Control (PSC) ship inspections are broadly published by major Port State Control regimes, affect the competitiveness of parties involved in shipping, prestige and image of the RS as internationally recognized organization, and are defined as one of the sources of information contributing to development of measures for the improvement of the RS activity.

4.2 Data on results of FSC ship inspections affect the Administration's satisfaction with the RS activity and are also defined as one of the sources of information contributing to development of measures to improve the RS activity.

4.3 The Register surveys the ships after their detention by Port State Control and/or Administration. The surveys are aimed at:

- 1) Assessing the nature and extent of defects, damages or failures/deficiencies of technical supervision items. Stipulating ways of rectifying deficiencies, control of the rectification;
- 2) Checking if deficiencies related to ineffective functioning of SMS and/or violation of ISPS Code requirements have been rectified. Assessing the adequacy of corrective and preventive actions and verifying their effectiveness;

- 3) Checking if deficiencies related to violation of MLC requirements have been rectified. Assessing the adequacy of the Company's corrective and preventive actions and verifying their effectiveness;
- 4) Reviewing and generalizing the accumulated information to take measures to prevent ship detentions.

4.4 To ensure independence, impartiality and integrity such surveys by the same Surveyors/Auditors who carried out the former initial/periodical/additional/occasional (in the scope of periodical) surveys of a ship preceding its detention shall be permitted only in exceptional cases, as agreed by RHO.

4.5 The Register activity under this Procedure is divided into three stages:

- 1) Prevention of ship detentions;
- 2) Operational measures to be taken in case of a ship detention;
- 3) Review of each ship detention including (where applicable) development and implementation of corrective and preventive actions with respect to non-conformities revealed.

5 Prevention of ship detentions

5.1 General

5.1.1 For the purposes of this Procedure, the main (day-to-day) Register activity with respect to fundamental processes F1, F4.2, F4.3, F4.5, F4.6, F7 shall be considered as an activity aimed to prevent ship detentions. The effectiveness of this activity depends on the commitment of all the personnel of the Register to the Code of Ethics for RS Employees and compliance with the RS Quality Policy. The reinforcement of the RS prestige and image is guaranteed by the following, in particular:

- 1) Compliance of RS products and services with the applicable international and national standards;
- 2) Maintenance of the RS personnel competence at the level complying with the applicable international standards;
- 3) Performance of duties by each RS employee following corporate culture principles.

5.1.2 Ship detentions cannot be prevented without understanding the safety culture by ship crews (primarily, by masters and chief engineers) as well as responsible personnel of shore-based divisions of shipping companies. The Register's mission is to fully assist its customers in achieving the commitment to safety culture. To ensure this:

- 1) The Heads of RS Branch Offices shall organize appropriate target-focused education for shipping companies in their area of activity;
- 2) RS Surveyors shall comply with Part III of the Guidelines on Technical Supervision of Ships in Service by making Reports on Deficiencies Possibly Affecting the Implementation of ISM Code on Board (form 6.3.65) at any ship visit when the commitment of the ship crew and/or company to safety culture is not evident.

5.1.3 The Heads of RS Branch Offices shall continually develop and maintain business relations with Port State Control authorities in their area of activity. The extent of setup business relations between the RS and PSC has an effect on prevention of ship detentions and preclusion of unjustified actions of PSC affecting the RS prestige and image.

5.2 Reviewing information on results of PSC ship inspections

5.2.1 RHO Department [342345](#) regularly collect, process and review information on results of inspections (without detention) of the RS-classed ships and/or ships having the RS-issued statutory certificates published by the PSC regimes. When more than 5 deficiencies are revealed based on the ship inspection results, including at least one deficiency regarding the item of the RS technical supervision, RHO Department [342345](#) introduces information on this PSC inspection into [the "PSC ships' inspection" table](#). Information on the ship inspection and necessity for actions required by the Procedure shall be sent to the general e-mail address of the RS Branch Office for in-service supervision (except for RHO Department 343).

5.2.2 The RS Branch Office for in-service supervision (RHO Department [342345](#) for ships registered in RHO Department 343) shall request the company to provide a copy of PSC report (where necessary) and confirm that deficiencies are rectified within a week to prevent detention of a ship in one of the next ports of call. Upon reviewing the company's response, RS Branch Office shall decide whether an occasional survey is required as soon as possible. The decision shall be taken with regard to requirements and instructions of Administration with respect to PSC ship inspections, the number and nature of deficiencies revealed, data on their rectification by the crew/company, recurrence of revealed deficiencies both on this ship and other ships, information on [most frequent grounds for detention](#). If the occasional survey is assigned, RS Branch Office shall add the respective requirement to the List of Survey's Status as a class retention condition.

5.2.3 RS Branch Office for in-service supervision (RHO Department [342345](#) for ships registered in RHO Department 343) shall maintain [records on work carried out](#) containing names and IMO numbers of ships, PSC inspection dates and locations, number of deficiencies revealed by PSC and actions taken by RS Branch Office for each case.

5.2.4 RS Branch Office, in the area of activity of which the ship is inspected by Port State Control, shall cooperate with PSC, in particular:

- 1) Maintain contacts with Port State Authorities to be able to call the Surveyor and/or MMS auditor when deficiencies/non-conformances are revealed on board the ship;
- 2) Maintain contacts with inspection officers to achieve a uniform interpretation of international convention and code requirements;
- 3) Provide inspection officers (as required) with information on results of previous Register surveys, existing restrictions, statutory requirements and/or class retention conditions;
- 4) Maintain contacts with the company's appointed person/representative, RHO Department 342345 and Administration where provided by the Agreement with MA for prompt exchange of information on all actions undertaken which affect safety issues;
- 5) Ensure immediate visit of a ship as required by Port State Authorities, and present visit results in a ship survey report (for example, form 6.3.34, form 6.3.32, form 6.3.10) and/or Report (form 6.3.65). If the ship is visited without owner's/company's application, prior to visit, the RS Branch Office shall inform the company's appointed person/representative of the purpose thereof.

5.3 Reviewing information on ship inspection/detention by Administration

5.3.1 RHO Department 342345 shall review information on ship inspection/detention provided by Administration, fulfil the Administration's instructions in accordance with applicable RS ND requirements.

5.3.2 The RS Branch Office involved in survey of the ship due to its inspection/detention by the Administration's representative shall comply with instructions of Administration and/or RHO, applicable RS ND requirements and take all necessary measures to prevent the ship detention by PSC.

5.4 Reviewing results of ship inspections by Russian Federation MA

5.4.1 The Heads of Branch Offices in RF shall continually develop and maintain business relations with port masters in their area of activity, strive for receiving timely notification of the RS of the deficiencies revealed on board ships, take all necessary measures to prevent ship detention by PSC in one of the next ports of call.

5.4.2 If the Branch Office receives information on port master's refusal to approve the Russian flagged ship leaving the port, the Head of the Branch Office shall ensure such a ship to be immediately attended by the RS Surveyor. The visit results shall be drawn up with a ship survey report (form 6.3.34). In addition, the Surveyor shall comply with requirements of the Procedure of Reporting by Surveyors of Deficiencies Relating to Possible Safety Management System Failures given in Part III of the Guidelines on Technical Supervision of Ships in Service using Report (form 6.3.65).

Note 1. If a ship cannot be immediately attended (e.g. the ship left the port without survey by RS), Head of the Branch Office in the region where detention took place informs RHO Department 342345 in written (with a copy to RS Branch Office for in-service supervision) providing proposals for further actions toward the ship. RHO Department 342345 analyses the obtained information and instructs RS Branch Office for in-service supervision on actions to be taken.

Note 2. Since Section 6, Part 1 of ND No. 2-020101-147-E "Rules for the Classification and Surveys of Small Craft" does not refer to the issuance of the Report (form 6.3.34), the Report (form 6.3.10) shall may be issued upon the results of occasional surveys of small craft in connection with the port master's refusal to approve their leaving the port. In this case, Department 342345, RHO, shall be promptly informed by the "Thesis" system internal document about the completion of such survey with the reference to relevant Request Number in the "Thesis" system where the reporting documents are uploaded.

5.4.3 Based on results of reviewing the report (form 6.3.65), the Head of RHO Department 331 where justified, may assign an additional SMS audit of a ship/company with notification sent to the Branch Office supervising a ship/company.

5.4.4 RHO Department 342345 shall weekly monitor data of PSC Information System "Global Reference Table of Ships" on results of inspection of Russian ships by the Russian Federation MA, submit information on each port master's refusal to approve the Russian flagged ship leaving the port to the Branch Office, in the area of activity of which the port in question is located, with a copy sent to RS Branch Office for in-service supervision.

6 Actions to be taken when a ship is detained by PSC

6.1 Instructions for Heads of RS Branch Offices

6.1.1 The Head of RS Branch Office, in the area of activity of which the ship is detained, upon receiving information on ship's detention, shall arrange a prompt attendance of a ship and its survey in accordance with requirements of Para

5.2.4 of the Procedure. Information on actions taken by RS Branch Office due to ship detention shall be immediately sent to RHO Department [342345](#) for coordination.

6.1.2 The Administration may nominate the Flag State Surveyor to attend the ship at the port of detention. When the ship is at the port of detention, well-coordinated and prompt interaction between the RS Surveyor/Auditor and representatives of the Flag State, shipping company and Port State is important.

6.1.3 Based on results of interaction between the RS Surveyor/Auditor and nominated Flag State Surveyor, and in case of absence of the latter, in an independent manner, the Head of the RS Branch Office involved in ship survey, where justified, shall assist the company in preparing the substantiated appeal against the ship detention. In this case, the Head shall be aware of national procedures for appeal adopted in the countries within the area of activity of Branch Office, and participate in arrangement and conduction of negotiations with PSC (both at the level of inspection officers and head or national coordinator of port state control in the country where the ship is detained).

6.1.4 The Head of RS Branch Office involved in survey of the detained ship shall take all reasonable efforts to cancel the RS responsibility for ship detention. If for objective reasons, the RHO's intervention is required to review the decision on RS responsibility, the Head of RS Branch Office shall assist RHO in preparing the substantiated appeal against the ship detention. A report on actions taken and their results shall be submitted by the Head of the RS Branch Office to RHO Department [342345](#).

6.1.5 If for any reason, the survey is not carried out at the port of detention, the Head of the RS Branch Office for in-service supervision shall be responsible for the requirement to provide the ship for the follow-up survey by the Register due to inspection/detention by PSC within one month of the ship's detention and for the notification of a shipowner of such a matter (for ships registered in RHO Department 343, notification is sent by RHO Department [342345](#)). The requirement shall be included in the List of Survey's Status as a class retention condition.

6.1.6 The Head of RS Branch Office for in-service supervision shall monitor the compliance with the due dates of survey of the ship and suspend the ship class where applicable.

6.1.7 If justified by RHO Department, occasional survey is not required when the following conditions are met:

- 1) Significant non-conformities in respect of the RS technical supervision items are not detected by PSC;
- 2) There are no instructions of the Administration on ship survey.

6.1.8 RS Branch Office for in-service supervision (excepting RHO Department 343) shall be notified by RHO Department [342345](#) of the decision taken with respect thereof.

6.2 Survey instructions for Surveyors/Auditors in case of ship detention

6.2.1 The scope and procedure for ship survey in case of ship detention shall be established in accordance with requirements given in [Agreement with MA, instructions](#) or one-time authorization of Administration.

6.2.2 If no specific instructions with respect to scope and procedure of the ship survey are issued by Administration, the Surveyor/Auditor shall:

- 1) Perform close-up survey of the RS technical supervision items reported by PSC as non-complying with applicable requirements;
- 2) Perform overall examination of the ship with regard to nature and number of deficiencies identified by PSC, results of the preceding inspections of the ship by PSC or the Administration within the last 36 months, ship's age, type, its actual technical condition, recommendations issued by RHO and/or RS Branch Office for in-service supervision, data on [most frequently detected non-conformities](#), topics of forthcoming PSC concentrated inspection campaigns, etc.);
- 3) Make sure that seafarers' rights are observed, review each deficiency identified by PSC with respect to MLC;
- 4) Report on deficiencies possibly affecting the implementation of ISM Code out of those identified during ship survey if there are grounds for additional company/ship SMS audit, record in report (form 6.3.65).
- 5) In case of grounds for ship detention related to possible ISM Code implementation failure, carry out the additional ship SMS audit, identify the causes of SMS [operation](#) failure;
- 6) In case of deficiencies related to possible SMS operation failure of shore-based divisions of the company, recommend the additional company SMS audit and record the results in the report.

6.2.3 For prompt submission of necessary information to RHO, receipt of additional instructions/recommendations, the Surveyor/Auditor shall maintain mobile communication with RHO Departments 331 and [342345](#).

6.2.4 If the attending Surveyor/Auditor does not agree with the availability/grading, ship applicability or wording of any deficiency/non-conformity formulated by PSC, the Surveyor/Auditor shall strive for the review of the record made by PSC by means of negotiations, i.e. put all necessary effort into making a substantiated appeal against the decision made by PSC. If this moot point cannot be settled through discussion with the PSC representative, the Surveyor/Auditor shall make a relevant entry in the survey report/ship SMS audit report reflecting the Surveyor's/Auditor's opinion of the moot point. The Surveyor's/Auditor's opinion shall contain references to applicable provisions of international conventions/codes supporting the Surveyor's/Auditor's judgment. The RS Branch Office involved in ship survey shall promptly send to Port State Control a letter substantiating the reasons for Surveyor's/Auditor's judgment (a copy of this letter shall be sent to RHO Department [342345](#)).

6.2.5 If the Surveyor establishes that a permanent statutory certificate carried on board has to be withdrawn, the Surveyor shall follow the provisions of Part III of the Guidelines on Technical Supervision of Ships in Service regarding the issuance and withdrawal of statutory certificates when deficiencies are found.

6.2.6 It is recommended that the Surveyor take photographs illustrating the nature and extent of the ship's defects, damages, and failures. The photographs shall be such as to show the condition of the ship's items both before (if possible) and after repair/rectification of deficiencies.

6.2.7 The company/crew shall agree upon the methods of repairs of defective (damaged) items or rectification of the deficiencies identified with the RS Surveyor involved in technical supervision during their repairs or rectification, respectively. The Surveyor shall state the relevant results in the ship survey report. A copy of the report is presented to PSC inspecting the ship, at their request.

6.2.8 The Surveyor shall specify the due dates for rectification of the deficiencies other than major ones, whose rectification has not been completed, having agreed upon the due dates with PSC and, if necessary, with the Administration.

6.2.9 The Surveyor shall determine and prescribe the due dates for fulfilling additional RS requirements imposed by the Surveyor based on the results of the ship survey (if any), having agreed upon them with MA/RHO where necessary.

6.2.10 The Auditor shall define the system causes of technical or other deficiencies specified in the PSC report. Not limited to the following, examples of such causes may be the following: absence of the Company's SMS procedures, their non-fulfilment or nominal fulfilment, lack of Company's control, insufficient crew qualification, absence of motivation in certain crew members to execute SMS procedures, etc.

6.2.11 The Auditor shall accurately define the specific SMS procedures, the absence, non-fulfilment or nominal fulfilment of which resulted in the appearance of non-conformities.

6.2.12 The Auditor shall define the extent of the company personnel liability for deficiencies/non-conformities and where justified, recommend the additional SMS audit for shore-based divisions of the company.

6.2.13 The Surveyor/Auditor shall describe the major cause of each deficiency/non-conformity in such a manner as to make it clear to any party reviewing the report. The description shall be detailed, explicit and technically correct.

6.2.14 The Auditor shall describe the company personnel's and/or ship crew's actions taken to correct PSC observations, eliminate causes of detention as well as projected terms of their execution.

6.2.15 In case where the ship is detained and PSC inspection is suspended until that Authority has been informed that the ship complies with all applicable requirements of international conventions, the scope of occasional survey by international conventions shall comply with the scope of annual/periodical surveys for statutory certificates previously issued to the ship by the Register.

6.3 Recurring detention within 12 months

6.3.1 If the detention takes place three or more months after the periodical or occasional (in the scope of periodical) survey, in addition to the requirements of Sections 6.1 to 6.2 of the Procedure the ship shall be submitted for occasional survey in the scope referred to in Para 6.3.3 of the Procedure within two weeks from the date of the recurring detention within 12 months. The ship shall be surveyed at the port of ship's detention. The purpose of the survey is to ascertain that the ship complies with applicable requirements of the international conventions and RS Rules in the period between prescribed surveys. This survey is the condition of class retention. RS Branch Office for in-service supervision is to take control over survey due date. If the date of the recurring within 12 months detention falls within the range of ship's periodical survey, this survey (excluding objectively time-consuming surveys, for example, special, renewal and intermediate surveys and dry-docking surveys) shall be completed within two weeks counting from the date of the detention.

6.3.2 If for objective reasons, the survey cannot be carried out fully as prescribed by Para 6.3.3 in the port of detention, the Surveyor is to conduct the survey to the maximum possible extent and set requirements on submitting

the RS technical supervision items, the survey of which has not been completed, within two weeks from the date of survey completion.

6.3.3 The scope of the classification survey shall not be less than that of annual survey. The scope of occasional survey by international conventions shall comply with the scope of annual/periodical surveys for statutory certificates previously issued to the ship by the Register.

6.3.4 The checklist in form 6.1.01, report in form 6.1.03 and report in form 6.3.34, where a respective note is made, confirm carrying out survey in the scope as per Para 6.3.3 of the Procedure.

6.3.5 If the ship was not submitted for survey in the port of recurring detention, RS Branch Office for in-service supervision shall:

- 1) Notify the shipowner on the necessity of carrying out occasional survey within two weeks from the date of recurring detention (for ships registered in RHO Department 343, notification is sent by RHO Department [342345](#)), adds the relevant requirement to the List of Survey's Status;
- 2) Control compliance with the date of occasional survey and its scope;
- 3) Suspend the ship class in case of non-compliance with the condition of class retention.

6.3.6 If the Surveyor/Auditor carrying out a survey of a ship reveals that the ship was detained twice within 12 months, the Surveyor/Auditor is to [notify RHO Department 345 in writing and](#) bring the applicable requirements of this Section of the Procedure to the attention of the ship's master.

6.4 Detention of RS classed ship being not subject for RS statutory services

6.4.1 If the ship classed with RS and holding statutory certificates issued by Administration or another classification society is detained by PSC and identified major deficiencies are related to items classed by RS, RS Branch Office for in-service supervision assigns the conditions of class retention and may suspend the ship's class for safety reasons, if applicable.

6.4.2 If the ship classed with RS and holding statutory certificates issued by Administration or another classification society, is detained by PSC within the due range of periodical class survey, RS Branch Office for in-service supervision recommends the shipowner to conduct said survey as soon as possible irrespectively of whether the major deficiencies are related to items classed by RS or not (for ships registered in RHO Department 343, recommendation is sent by RHO Department [342345](#)).

6.4.3 If the ship classed with RS and holding statutory certificates issued by Administration or another classification society, is detained by PSC for the second time within 12 months (except for cases specified in Para 6.1.9 of the Procedure), ship's occasional survey in a scope of annual classification survey shall be carried out within 2 weeks from the date of recurring detention. It is necessary to follow applicable requirements of Para 6.3 of the Procedure and Part II of the Guidelines on Technical Supervision of Ships in Service regarding class suspension for non-compliance with the conditions of class retention.

6.5 Information support

6.5.1 The received information on ship detention is promptly sent by RS Branch Office to RHO Department [342345](#). RHO Department [342345](#) weekly compares information on ship detentions published by the major PSC regimes with that received earlier both on ships covered by RS statutory services and ships classed by RS only (where reasonably practicable).

6.5.2 RHO Department [342345](#) ~~regularly~~ annually submits information on detentions of Russian flagged ships covered by RS statutory services to [RHO Department 326 in accordance with ND No. 2-040101-005 "Regulations on the Annual Report of the Russian Maritime Register of Shipping"](#) ~~the Department of State Policy for Maritime and River Transport of the Ministry of Transport of the Russian Federation.~~

6.5.3 RHO Department [342345](#) promptly sends to the Administration the information on detention of a ship registered in RHO Department 343 if there is no proof that the Administration was already notified on this detention (the RS was informed of detention by the Administration itself, correspondence on detention was addressed to MA in copy, MA was notified by the Port State Control, shipowner etc.).

6.5.4 RS Branch Office for in-service supervision (122, ~~123~~, 124, 140, 142, 143, ~~180~~, 181) notifies the Administration of detention of the ship registered in this RS Branch Office in accordance with relevant Agreement with MA.

6.5.5 RHO Department 355 is to ensure that the following information is shown in the List of Survey's Status (Form 6.3.51-1):

- 1) information on detentions of the ship by PSC within the last 36 months before the current date;

- 2) information on ship in Fleet Monitoring System and/or special surveillance regime (where applicable);
- 3) information on ship inspection/detention by PSC/Administration (country, date and port of inspection) if no reports of occasional survey in connection with this case have been received by RHO Department [342345](#) and included in the database.

6.5.6 RS Branch Office for in-service supervision (RHO Department [342345](#) for ships registered in RHO Department 343) shall include the requirement on the need of ship's submission for the survey in connection with the detention as a condition of class retention to the List of Survey's Status if the respective survey application was not received by RS or was received but cancelled by the applicant (the RS Branch Office that received the later cancelled application shall inform RS Branch Office for in-service supervision and RHO Department [342345](#) of such a matter).

6.5.7 The information on detention received by RHO Department [342345](#) is to be sent to RS Branch Office for in-service supervision (except for ships registered in RHO Department 343) to arrange the required surveys/audits (technical supervision, ISM and/or ISPS Code audits).

6.5.8 If the ship holds the valid SMC issued by the RS, and Classification Certificate and other statutory certificates are issued by the Maritime Administration or another classification society, and this ship is detained due to reasons not explicitly associated with ISM Code by PSC, information on detention of such a ship is not recorded in the database.

7 Records

7.1 List of records

7.1.1 The Surveyor shall draw up a Report in form 6.3.34 based on the results of the follow-up survey due to ship's inspection/detention by PSC/Administration describing in detail the extent and nature of defects, damages or failures in respect of each item of the PSC/Administration report related to the RS competence, as well as the repair/rectification method. A copy of the PSC/Administration report shall be attached.

7.1.2 If the Report in form 6.3.34 contains references to other reports (for example, form 6.3.10, form 6.3.32) drawn up during the survey in question, the copies of these reports shall be ~~included in records attached to the Report in form 6.3.34~~. If certificates, supplements or records thereto were issued to the ship during the survey in question, the copies of these documents shall be ~~included in records attached to the Report in form 6.3.34~~. Copies of documents drawn up by organizations recognized by the RS or other classification societies and taken into consideration during the ship survey (for example, reports on equipment diagnostics, acceptance certificates, etc.) shall also be included in records.

7.1.3 The digital photographs taken by the Surveyor in accordance with 3.1, Part I of the Guidelines on Technical Supervision of Ships in Service shall be included in records.

7.1.4 In addition, the Surveyor shall comply with requirements of Procedure of Reporting by Surveyors of Deficiencies Relating to Possible Safety Management System Failures given in Part III of the Guidelines on Technical Supervision of Ships in Service using Report (form 6.3.65).

7.1.5 The Surveyor is to supplement the list of records by checklist in form 6.3.66 if this is mandated by the Administration's requirements and instructions.

7.1.6 Records shall be made in compliance with the requirements of ND No. 2-049901-001 "Procedure for Application of RS Documents Forms Drawn Up During Technical Supervision" and ND No. 2-060201-025-E "Procedure for Technical Supervision of Ships in Service".

7.1.7 Records for the ships under the flag of the Russian Federation inspected/detained by PSC are drawn up in Russian and English. Documents for the ships under other flags are drawn up in English (they may be drawn up in English and Russian at shipowner's request).

7.1.8 Records for the ships under the flag of the Russian Federation inspected/detained by the Administration may be drawn up in Russian only. Documents for the ships under other flags are drawn up in English (they may be drawn up in English and Russian at shipowner's request).

7.1.9 While performing the ship additional SMS audit in connection with the ship inspection/detention by PSC/MA, the Auditor shall draw up the Appendix to Report (form 8.1.9-1) in accordance with Paras 6.2.10 - 6.2.14 of the Procedure.

7.1.10 Reporting documents should be attached to the Request card of the "Thesis" System within three working days after the completion of the survey.

7.2 Sending records to Administration

7.2.1 If the ship is registered in RHO Department 343, RHO Department ~~342345~~ shall inform the Administration of the results of the Register survey of the ship due to its inspection/detention as provided by the [Agreement with MA, instructions](#) or one-time authorization of Administration. No report is to be sent to Administration if the survey was performed in accordance with Para 6.4 of the Procedure.

7.2.2 RS Branch Office for in-service supervision (122, ~~123~~, 124, 140, 142, 143, ~~180~~, 181) shall inform the Administration of the Register survey results and submit the additional information as required by the Administration.

7.2.3 RHO Departments ~~331 and 332~~ shall inform the Administration of results of additional ship audits against ISM Code, ISPS Code, MLC due to their detention.

8 Review of ship detention

8.1 General

8.1.1 Expertise and Analysis Centre (EAC) in accordance with ND No. 2-010105-010-E "Procedure Regulations for the Expertise and Analysis Centre" shall review each ship detention by PSC/Administration to review the nature of identified deficiencies/non-conformities and presence of the RS responsibility, to identify the types and dates of surveys of the ship preceding the detention, whose adequate performance in the prescribed scope would have precluded the deficiencies/non-conformities, and the RS Branch Offices and specific Surveyors/Auditors that performed the ship's surveys in question.

8.1.2 Based on results of reviewing ship detention materials, ship file data, reports (form 8.3.38) submitted by RS Branch Offices, Expertise and Analysis Centre may decide to identify a non-conformity or major non-conformity with respect to activity of one or more RS Branch Offices.

8.1.3 Quality Division (410) shall manage non-conformities identified by EAC in accordance with ND No. 2-060102-002-E "Procedure for RS Performance Evaluation and Improvement".

8.1.4 In each particular case the Register reserves its right to demand an additional ship and/or company SMS audit. The additional company SMS audit may be required based on review of reasons of ship detention with regard to recurring detentions, SMS effective operation, as well as number and nature of observations imposed.

8.1.5 RHO Department ~~332331~~ shall review, process and generalize information on ship detentions related to RS responsibility with respect to MLS.

8.2 Review of detention by the RS Branch Office involved in survey preceding the ship's detention

8.2.1 Upon the RHO request, the Head of RS Branch Office involved in survey of items of the RS technical supervision, safety or security management system, MLS requirements preceding the ship's detention with identified deficiencies/non-conformities shall promptly review the ship detention case and draw up the Report on analysis of ship's detention (form 8.3.38).

8.2.2 The Head of the RS Branch Office shall provide the following documents to RHO Department ~~342345~~ within a time period not exceeding 10 days from the date of receipt of request:

- 1) Explanatory letters from Surveyors/Auditors that performed the ship's surveys;
- 2) Report on analysis of ship's detention (form 8.3.38).

8.2.3 If, in the opinion of the Head of the RS Branch Office, the decision by PSC or Maritime Administration to attribute the detention to the RSR is unjustified, he shall immediately send the draft substantiated appeal proved by objective evidence to that effect to RHO Department ~~342345~~.

8.2.4 RHO is to review the received draft appeal and decide whether to send an appeal from the RS to PSC/Administration.

8.3 Data review and generalization

8.3.1 In order to ensure effective operation of Expertise and Analysis Centre, RHO Departments ~~332331~~ and ~~342345~~ shall promptly update records in the database on actions taken with regard to each case of ship detention. RHO Department 602 shall verify competence of Surveyors who performed the surveys preceding the ship's detention.

8.3.2 RHO Department ~~342345~~ shall summarize data on ship detentions and results of their review and inform RS Branch Offices by means of [annual reports on ship's detentions](#).