

Exh. MM-51
Docket TP-220513
Witness: Michael Moore

**BEFORE THE STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND PILOTS,

Respondent.

Docket No. TP-220513

EXHIBIT TO TESTIMONY OF

Captain Michael Moore

ON BEHALF OF

PACIFIC MERCHANT SHIPPING ASSOCIATION

2021 Port State Control Annual Report, US Coast Guard

FEBRUARY 10, 2023



DEPARTMENT OF HOMELAND SECURITY
UNITED STATES COAST GUARD



PORT STATE CONTROL IN THE UNITED STATES



2021 ANNUAL REPORT

Rear Admiral John W. Mauger

ASSISTANT COMMANDANT FOR PREVENTION POLICY
UNITED STATES COAST GUARD

I am pleased to present the 2021 United States Coast Guard (USCG) Port State Control (PSC) Annual Report summarizing the enforcement of SOLAS, MARPOL, and other international conventions on foreign vessels trading in United States (U.S.) ports. The U.S. is a maritime nation. Our Nation's security and prosperity are inextricably linked to a safe and efficient Marine Transportation System (MTS)-protecting our ports and waterways is essential to our economic prosperity and national security.



Year 2021 and the global pandemic posed many challenges to our nation and the world. The maritime supply chain was vital to the delivery of food, medicine, energy and commerce which provided life-saving relief. I want to thank the seafarers and maritime professionals around the world for their extraordinary efforts to maintain a safe and secure MTS under unprecedented challenges. Safety is a team support and this report reflects the work of many stakeholders including: the Foreign Flag Administrations, Recognized Organizations, and operators who invest time and resources to making shipping safer; the seafarers who safely operate and maintain their vessels; our dedicated USCG PSC Officers who work tirelessly to develop and implement effective programs to protect our nation's ports. Through the combined efforts of all of these stakeholders we continue to make the USCG PSC program one of the finest in the world.

While we can admire the progress that we've made to date, we must remain on guard and be always ready in the face of considerable change. The MTS is increasingly complex and three enduring drivers shape our operating environment: (1) increasing MTS capacity; (2) public demand for sustainability and environmental stewardship; and (3) the use of ever-more complex technologies and operating concepts to improve efficiencies and profitability. Within the USCG, we have implemented a Prevention Readiness Initiative to provide the necessary personnel, governance and capabilities needed to remain ready in the face of these immense challenges.

Our PSC program remains focused on reducing substandard shipping worldwide. The vessels trading with the U.S. must continue to meet the stringent safety, environmental, and cyber security requirements. Deficiencies with firefighting equipment, lifesaving equipment and safety management systems continue to be the leading cause for detentions on vessels calling on the U.S. It is imperative that Flag Administrations, recognized organizations and operators continue to actively promote safety management systems and enable the seafarers to correct substandard conditions.

The QUALSHIP 21 E-Zero program was upgraded this year to further recognize those exemplary vessels that have demonstrated an exceptional commitment to environmental stewardship. Vessels entering the program now receive a digital e-certificate with the vessel's name, certificate number, official seal of the USCG, and a QR code linking directly to the USCG's PSC program website.

I look forward to continuing our strong relationships with flag states, classification societies, owners, and vessel operators as we work together to promote safe and secure shipping around the world.

Semper Paratus



Table of Contents

PORT STATE CONTROL IN THE UNITED STATES 2021 ANNUAL REPORT

Chapter 1 - Port State Control Overview

2021 Highlights	3
2021 Port State Control Statistics by Region	4
2021 Port State Control Statistics by Port	5
Flag Administration Historical Performance	6
Port State Control Appeal Process	7

Chapter 2 - Compliance Performance

Port State Control Safety and Environmental Protection Compliance Targeting	9
2021 Flag Administration Compliance Performance	10
2021 Flag Administration Compliance Performance Statistics	11
2021 Recognized Organization Compliance Performance	14
Quality Shipping for the 21st Century (QUALSHIP 21) and E-Zero	15

Chapter 3 - Deficiency Statistics

Detainable Deficiencies Overview	19
Statistics Derived from USCG Port State Control Examinations	20
Detention Deficiency Breakdown	22
2021 Deficiencies by Categories	23
Ballast Water Data	24
U. S. Port State Control Contact Information	26



CHAPTER

1

Highlights in 2021

Vessel Arrivals, Exams, and Detentions

In 2021, a total of 10,945 individual vessels, from 81 different flag administrations, made 73,974 port calls to the U.S. 8,663 PSC exams were conducted. Despite the ongoing global pandemic, these exam numbers increased over the 2020 total of 7,383 and have surpassed the 2019 pre-pandemic total of 8,622. The total number of ships detained in 2021 for environmental protection, safety, and security related deficiencies increased from 57 to 63.

Flag Administration Performance

In 2020, the Coast Guard combined safety and security compliance performance for all program measures. Flag Administration performance for 2021 dropped slightly with the overall annual detention rate decreasing from 0.77% to 0.73%. Additionally, the three-year rolling detention ratio decreased from 1.02% to 0.87%. Barbados, Cook Islands, Liberia, Malta, and the Philippines were removed from the Targeted Flag List this year.

Detention and Association Appeals

In 2021, the Coast Guard received a total of twenty-four appeals. Ten appeals challenged the overall merits of the detention. For those merit appeals, one was granted, seven were denied, and two are still being adjudicated at the time of this report.

In addition to receiving appeals contesting the overall merits of a detention, we also receive appeals requesting the removal of a party's association to a detention. For those parties appealing their association with a detention, fourteen were received. Of those, seven were granted and the other six were denied. For more information on the Coast Guard's appeal process, please see our process guidance on page seven of this report.

QUALSHIP 21 and E-Zero Programs

Once again, the USCG considered the impact of COVID-19 on international shipping when determining QUALSHIP 21 (QS21) eligibility. However, no changes were made to the eligibility criteria based on the reduced number of vessels trading with the United States in 2021.

The QS21 program ended calendar year 2021 with an impressive 3,661 vessels enrolled. In 2020, we welcomed three

additional flag administrations into the program with five losing their QS21 eligibility. For 2021, one flag administration lost its eligibility while five additional flags became eligible. We would like to welcome the flag administrations of Barbados, China, Liberia, Malta, and the Philippines for becoming QS21 eligible this year. The full list of QS21 flag administrations is located in Chapter 2 of this report.

The E-Zero program focuses on environmental stewardship and worldwide compliance with international environmental conventions. By the end of 2021, 220 ships received the E-Zero designation.

Enhanced Exam Program

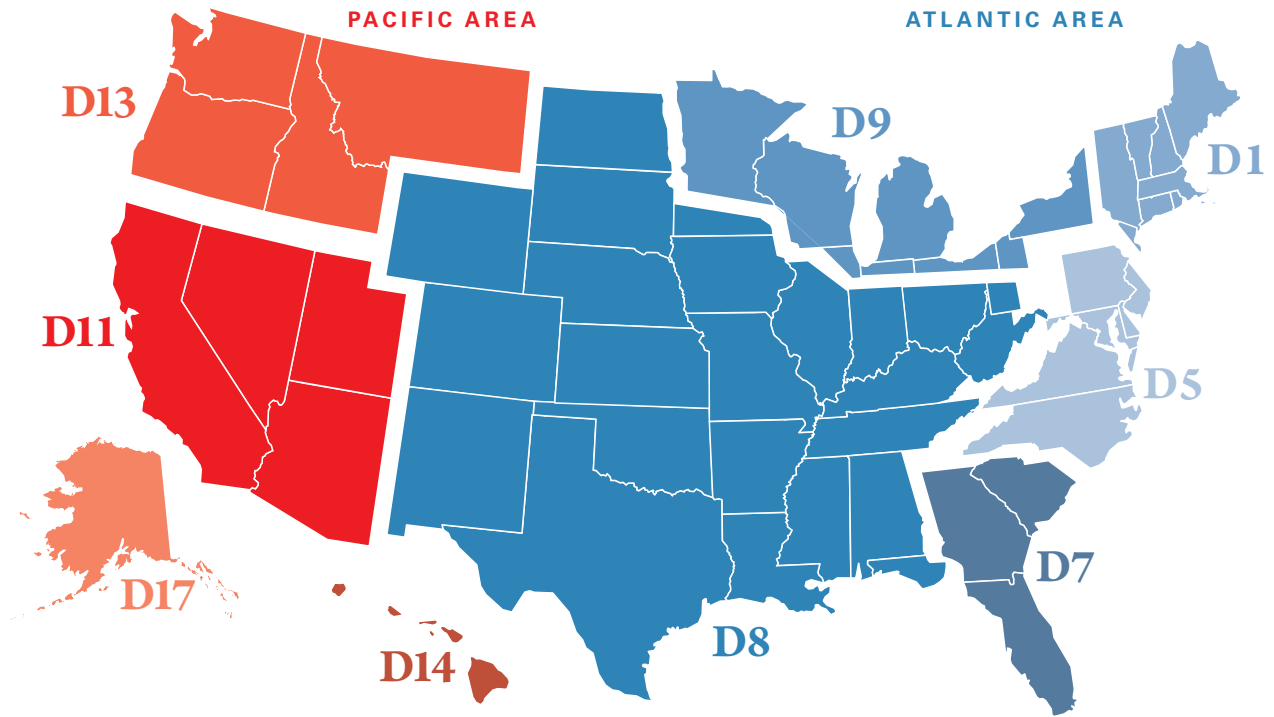
Beginning in 2021, the Coast Guard initiated the Enhanced Exam Program (EEP). This program, similar to the Concentrated Inspection Campaigns (CICs) carried out by port state control MoUs, is intended to increase focus on specific aspects of ship safety on a quarterly basis. This increased focus may vary due to the implementation of new regulations, deficiency trends, or other PSC program interests.

The goal of the EEP is to generate meaningful data on exam points of interest, while limiting the additional workload of the PSCOs. The information collected can then be considered for evaluating current policy effectiveness, and determine if adjustments need to be made in the future. In 2021, PSCOs carried out enhanced exams as part of routine port state control exams on ballast water compliance, fire and abandon ship drills, and MARPOL Annex VI.

The enhanced exams conducted resulted in 41 ballast water, 8 fire and abandon drills, and 13 MARPOL Annex IV deficiencies. Through the ballast water EEP, additional clarity was gained on the methods that vessels are using to maintain compliance. It was established over a 3 month period that 56% of the ships surveyed used a Coast Guard approved ballast water management system, while 22% of ships possessed an extension letter. It is also worth noting that during the fire and abandon ship drills, deficiencies occurred in less than 1% of exams conducted.



2021 Port State Control Statistics By Region



District	Ship Visits	PSC Examinations Conducted	Detentions
1st	6,963	859	1
5th	7,345	950	19
7th	20,460	1,504	20
8th	24,051	3,260	16
9th	2,750	108	0
11th	7,209	873	2
13th	3,826	784	4
14th	982	239	1
17th	388	86	0
Total	73,974	8,663	63

Note: On the following pages, please find tables depicting PSC statistics by region and port, and Flag Administration safety and security performance.

2021 Port State Control Statistics by Port

Coast Guard Officer in Charge of Marine Inspection/Port	Coast Guard District	Safety Examinations	Detentions
Sector Anchorage	17	65	0
Sector Boston	1	54	0
Sector Buffalo	9	30	0
Sector Charleston	7	181	4
Sector Columbia River	13	433	2
Sector Corpus Christi	8	385	4
Sector Delaware Bay	5	373	5
Sector Detroit	9	24	0
MSU Duluth	9	28	0
Sector Guam	14	75	0
Sector Honolulu	14	164	1
Sector Houston/Galveston	8	1,160	2
Sector Jacksonville	7	167	0
Sector Juneau	17	21	0
Sector Key West	7	10	0
Sector Lake Michigan	9	23	0
Sector Long Island Sound	1	62	0
Sector Los Angeles/Long Beach	11	535	1
Sector Maryland-NCR	5	219	12
Sector Miami	7	369	10
Sector Mobile	8	366	4
MSU Morgan City	8	15	0
Sector New Orleans	8	920	5
Sector New York	1	631	0
Sector North Carolina	5	92	1
Sector Northern New England	1	35	0
MSU Port Arthur	8	414	1
Sector Puget Sound	13	351	2
Sector San Diego	11	82	0
Sector San Francisco	11	256	1
Sector San Juan	7	374	4
Sector Sault Ste Marie	9	3	0
MSU Savannah	7	240	1
Sector Se New England	1	77	1
Sector St Petersburg	7	163	1
Sector Virginia	5	266	1

Note: Due to the organization of Coast Guard field units into Sectors and Marine Safety Units, ports listed above reflect Coast Guard Captain of the Port (COTP) and Officer in Charge of Marine Inspection (OCMI) zones.

Flag Administration Historical Performance

The following definitions apply to the table below:

Safety-Related Detention: U.S. intervention on a foreign vessel when its operational condition or crew do not substantially meet applicable international conventions to ensure the vessel will not proceed to sea without presenting a danger to the vessel, its crew, the port, or cause harm to the marine environment.

Annual Detention Ratio: The yearly sum of safety-related detentions divided by the yearly sum of PSC examinations multiplied by one hundred.

Three-Year Average Detention Ratio: The cumulative sum of safety-related detentions from January 2018 through December 2020 divided by the cumulative sum of PSC examinations

during those three years multiplied by one hundred.

ISPS Major Control Action: A control measure (e.g., detention, denial of entry, or expulsion) imposed by the U.S. on a foreign vessel when clear grounds exist indicating that a ship is not in compliance with the requirements of SOLAS Chapter XI or part A of the ISPS Code.

Annual ISPS Control Action Ratio (CAR): The yearly sum of ISPS major control actions divided by the yearly sum of ISPS compliance examinations, multiplied by one hundred.

Average ISPS Control Action Ratio (CAR): The average of the Annual ISPS Control Action Ratio data from the previous three years.

*** This table contains revised data based on appeal decisions and may not reflect the data that was previously published in past reports.

Calendar Year	Number of Safety Exams	Safety Related Detentions	Annual Detention Ratio	3-Year Average Detention Ratio	Major ISPS Control Actions	Annual ISPS Control Action Ratio	Rolling Average ISPS Control Action Ratio ¹
2011	10,129	97	1.04%	1.53%	15	0.16%	0.18%
2012	9,469	105	1.17%	1.30%	8	0.09%	0.14%
2013	9,394	121	1.29%	1.11%	8	0.09%	0.12%
2014	9,232	143	1.55%	1.31%	10	0.12%	0.10%
2015	9,265	201	2.17%	1.67%	11	0.13%	0.11%
2016	9,390	98	1.04%	1.58%	8	0.09%	0.11%
2017	9,105	91	0.99%	1.40%	6	0.06%	0.10%
2018	9,025	103	1.16%	1.06%	8	0.09%	0.08%
2019	8,622	95	1.10%	1.07%	7	0.08%	0.08%

¹ Targeting thresholds for vessel security was fixed at 1.5% in 2005 and has remained fixed since then.

In 2020, the Coast Guard combined safety and security compliance for all performance measures.

Calendar Year	Number of PSC Exams	Number of Detentions	Annual Detention Ratio	3-Year Average Detention Ratio
2020	7,383	57	0.77%	1.02%
2021	8,663	63	0.73%	0.87%

Port State Control Appeal Process

Any directly affected party wishing to dispute the validity of or their association with a detention should follow the appeal procedures outlined in Title 46 Code of Federal Regulations Subpart 1.03—Rights of Appeal. The appeal process allows for three separate levels of review starting with the cognizant Officer in Charge, Marine Inspection (OCMI) / Captain of the Port (COTP), District, and finally Headquarters. At each level, the appellant has an opportunity to present new or additional information, as to why the appeal should be granted. Coast Guard officials responsible for the review and determination of an appeal remain objective as both positions are reviewed and weighed carefully. We value the role of the appeal process in the overall fairness of our Port State Control program, and emphasize that there will be no repercussions to the appellant for seeking reconsideration or requesting to appeal a decision or detention.

For Recognized Organization (RO) Related Detentions

Appeals from ROs must be submitted within 30 days of detention notification. All appeals shall be in writing and can be submitted electronically to: PortStateControl@uscg.mil

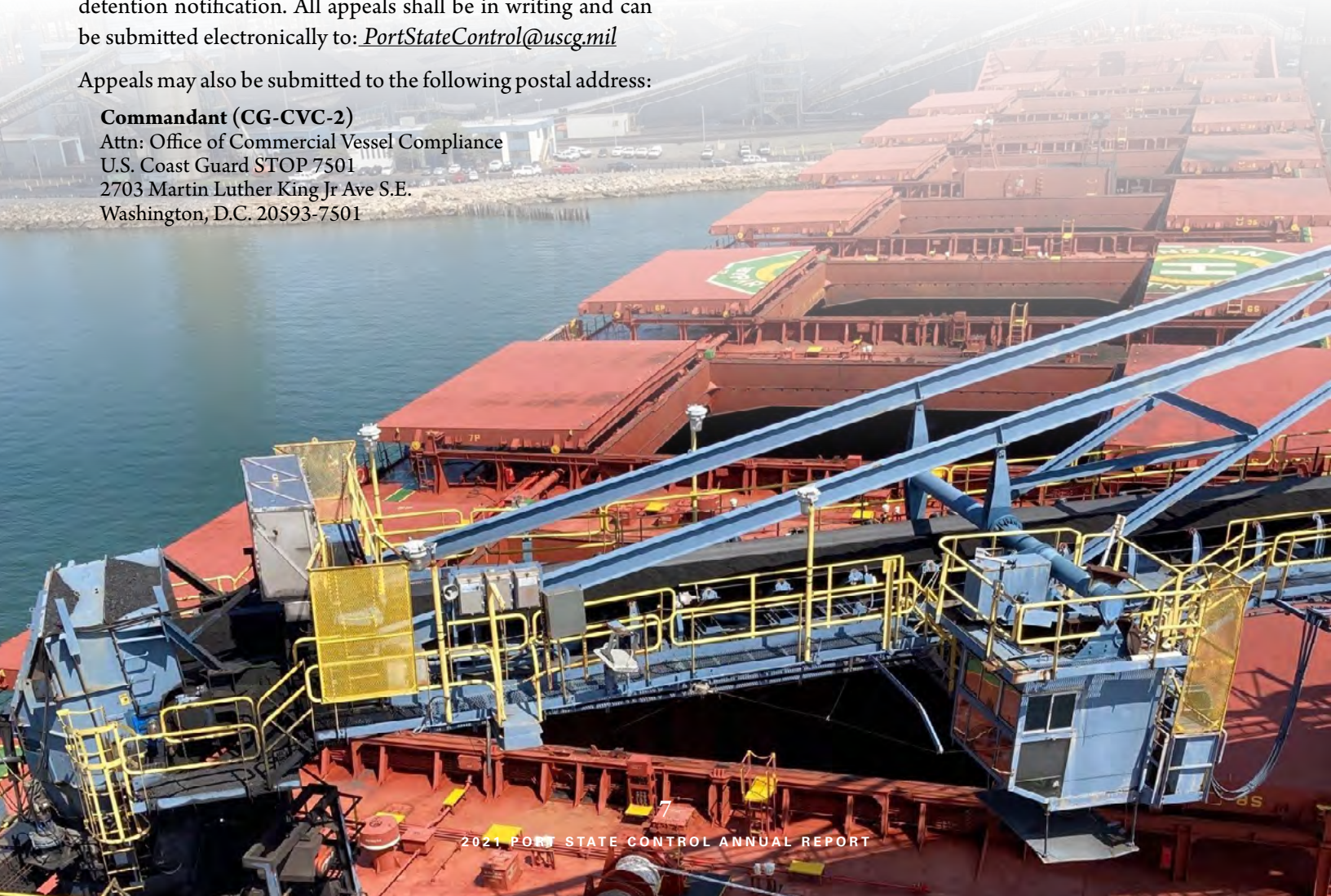
Appeals may also be submitted to the following postal address:

Commandant (CG-CVC-2)
Attn: Office of Commercial Vessel Compliance
U.S. Coast Guard STOP 7501
2703 Martin Luther King Jr Ave S.E.
Washington, D.C. 20593-7501

For All Merit Detentions

Any person affected by a decision or action (e.g., PSC detention), may request reconsideration without delay by communicating directly with the OCMI/COTP especially if a delay caused by submitting an appeal in writing would have an adverse impact. Any person who receives an unfavorable decision, may then submit a formal appeal in writing to the District Commander via the OCMI/COTP. The same process follows for submitting a formal appeal in writing to the Headquarters Office of Commercial Vessel Compliance (CG-CVC) via the District Commander. CG-CVC serves as the final agency action for appeals involving vessel inspection issues and will consider any additional information that was not included in the former appeals.

Please refer to Title 46 CFR Subpart 1.03 - Rights of Appeal for more details on the appeal process and the Coast Guard Homeport website to obtain OCMI/COTP and District Commander contact information at <https://homeport.uscg.mil/>



CHAPTER

2

Port State Control Safety, Security, and Environmental Examination Factors

The U.S. Coast Guard (USCG) administers a comprehensive Port State Control (PSC) examination program in order to ensure safe, secure, and environmentally responsible shipping that supports the global objective of eliminating substandard ships. The USCG screens vessels prior to arrival in U.S. ports and assesses a multitude of regulatory and risk-based factors in order to determine foreign vessel examination requirements. For more information on the USCG PSC examination program, please refer to Marine Safety Manual Volume II: Material Inspection, COMDTINST M16000.7B (series) which is available online at: <https://www.uscg.mil/Resources/Library/>



2021 Flag Administration Compliance Performance

Beginning on July 1, 2022, the Coast Guard will target Flag Administrations for additional PSC examinations if their three-year detention ratio scores higher than 1.0% and if an Administration is associated with more than one detention in the past three years. Flags are categorized as medium risk if their overall three-year detention ratio is between 1.0% and 2.0%. A Flag administration is categorized as high risk if their overall three-year detention ratio is greater than 2.0%. We calculate detention ratios using the most current three years of PSC data. Flags with only one detention in the past three years are removed from the targeted flag list.

High Risk Flag Administrations

Flag	2019-2021 Detention Ratio
Belgium	2.22%
Bolivia	26.32%
Israel	9.68%
Mexico	4.40%
Saint Kitts and Nevis	11.76%
Saint Vincent and the Grenadines	5.11%
Tanzania	9.68%
Togo	3.26%
Turkey	3.33%

Medium Risk Flag Administrations

Flag	2019-2021 Detention Ratio
Antigua and Barbuda	1.42%
Cyprus	1.71%
Panama	1.01%
Portugal	1.22%
Vanuatu	1.27%

Flag Administrations Removed from Last Year's Targeted List

Barbados	Liberia	Philippines
Cook Islands	Malta	

2021 Flag Administration Compliance Performance Statistics

Flag (1)	PSC Exams	PSC Safety Exams with Deficiencies	Distinct Arrivals	Safety Detentions	2019-2021 Detention Ratio
Algeria	1	1	1	0	0.00%
Anguilla	2	0	1	0	0.00%
Antigua and Barbuda	215	70	185	3	1.42%
Bahamas	448	131	541	4	0.60%
Bahrain	1	0	1	0	0.00%
Barbados	22	7	24	0	0.00%
Belgium	34	6	39	0	2.22%
Belize	2	1	2	1	9.09%
Bermuda	58	14	72	0	0.00%
Bolivia	8	6	5	3	26.32%
Brazil	2	0	3	0	0.00%
British Virgin Islands	8	3	9	0	0.00%
Canada	92	23	132	2	0.93%
Cayman Islands	157	22	304	0	0.00%
China	42	10	54	0	0.00%
Columbia	1	0	1	0	0.00%
Comoros	1	0	1	0	0.00%
Cook Islands	22	10	13	0	1.47%
Croatia	7	2	8	0	0.00%
Curacao	12	1	16	0	0.00%
Cyprus	188	48	215	4	1.71%
Denmark	160	29	177	1	0.25%
Dominica	0	0	1	0	0.00%
Dominican Republic	2	1	2	0	0.00%
Egypt	4	1	4	0	0.00%
Faroe Islands	4	3	2	0	0.00%
Finland	7	3	4	0	0.00%
France	26	7	31	0	0.00%
Germany	29	6	48	0	0.00%
Gibraltar	10	2	15	0	0.00%
Greece	179	32	217	1	0.38%
Guyana	3	1	3	0	0.00%
Honduras	4	1	4	0	0.00%

¹ If an Administration has only one distinct arrival with no exams and a 0.00% detention ratio, that Administration may not be listed.

* One or more detention appeals are under adjudication. The listed 3-year detention ratio may need to be revised as a result.

2021 Flag Administration Compliance Performance Statistics

Flag (1)	PSC Exams	PSC Safety Exams with Deficiencies	Distinct Arrivals	Safety Detentions	2019-2021 Detention Ratio
Hong Kong	511	102	826	3	0.67%
India	6	0	10	0	0.00%
Indonesia	5	4	6	0	0.00%
Ireland	1	1	2	0	0.00%
Isle of Man	90	13	125	1	0.60%
Israel	9	2	6	0	9.68%
Italy	46	15	44	1	0.82%
Jamaica	14	3	41	0	0.00%
Japan	84	13	100	0	0.94%
Latvia	3	2	1	1	33.33%
Liberia	1,308	294	1,519	6	0.88%
Libya	2	0	2	0	0.00%
Luxembourg	6	2	11	0	0.00%
Malaysia	7	2	7	0	0.00%
Malta	569	115	673	4	0.69%
Marshall Islands*	1,268	285	1,861	7	0.66%
Mexico	25	10	22	0	4.40%
Moldova	14	6	5	0	0.00%
Montenegro	3	1	3	0	0.00%
Netherlands	91	23	164	1	0.61%
Nigeria	4	0	4	0	0.00%
Norway	187	45	251	0	0.17%
Pakistan	3	3	3	0	16.67%
Palau	4	2	1	0	7.69%
Panama	1,415	370	1,709	12	1.01%
Papua New Guinea	1	1	1	0	0.00%
Philippines	41	11	46	0	0.76%
Portugal	204	42	193	3	1.22%
Qatar	1	0	5	0	0.00%
Republic of Korea	33	7	55	0	0.00%
Russian Federation	5	1	2	0	0.00%
Saint Kitts and Nevis	12	6	6	1	11.76%
Saint Vincent and the Grenadines	53	17	38	1	5.11%
Samoa	13	3	2	0	0.00%

¹ If an Administration has only one distinct arrival with no exams and a 0.00% detention ratio, that Administration may not be listed.

* One or more detention appeals are under adjudication. The listed 3-year detention ratio may need to be revised as a result.

2021 Flag Administration Compliance Performance Statistics

Flag (1)	PSC Exams	PSC Safety Exams with Deficiencies	Distinct Arrivals	Safety Detentions	2019-2021 Detention Ratio
Saudi Arabia	32	2	37	0	0.00%
Singapore	652	130	789	1	0.70%
Spain	18	6	16	0	0.00%
Sweden	9	1	12	0	0.00%
Switzerland	5	1	8	0	0.00%
Taiwan	3	2	23	0	0.00%
Tanzania	8	6	4	0	9.68%
Thailand	9	2	13	0	0.00%
Togo	26	15	15	0	3.26%
Turkey	20	4	17	1	3.33%
Tuvalu	3	0	4	0	0.00%
United Kingdom	47	14	79	0	0.00%
Vanuatu	40	11	40	1	1.27%
Vietnam	2	1	2	0	0.00%

¹ If an Administration has only one distinct arrival with no exams and a 0.00% detention ratio, that Administration may not be listed.

* One or more detention appeals are under adjudication. The listed 3-year detention ratio may need to be revised as a result.



2021 Recognized Organization Safety Compliance Performance

Recognized Organizations with a detention ratio greater than 2.00% will be considered as Priority I for the approval requirements outlined in 46 CFR 2.45-15(2).

Recognized Organization (RO)*	Abbreviations	Vessel Examinations				RO-Related Detentions				Ratio
		2019	2020	2021	Total	2019	2020	2021	Total	
American Bureau of Shipping	ABS	1,833	1,639	2,366	5,838	-	-	-	-	0.00%
Bulgarian Register of Shipping	BKR	23	17	12	52	-	-	-	-	0.00%
Bureau Veritas	BV	1,150	1,041	1,643	3,834	2	-	5	7	0.18%
China Classification Society	CCS	204	176	227	607	-	1	-	1	0.16%
Conarina Group	CNRIN	60	0	56	116	1	-	1	2	1.72%
CR Classification Society	CR	12	7	11	30	-	-	-	-	0.00%
Croatian Register of Shipping	CRS	16	8	17	41	-	-	-	-	0.00%
DNV	DNV	2,577	3,149	4,064	9,790	3	-	-	3	0.03%
Hellenic Register of Shipping	HRS	5	9	12	26	-	-	-	-	0.00%
Horizon International Naval Survey and Inspection Bureau	HNS	4	4	10	18	-	-	-	-	0.00%
Indian Register of Shipping	IRS	23	5	10	38	-	-	-	-	0.00%
Intermaritime Certification Services	IMC	8	16	19	43	-	-	-	-	0.00%
International Register of Shipping	IROS	8	6	11	25	-	-	-	-	0.00%
Isthmus Bureau of Shipping	IBS	28	20	25	73	-	-	-	-	0.00%
Korean Register of Shipping	KR	296	274	428	998	-	1	-	1	0.10%
Lloyd's Register	LR	2,457	2,042	2,774	7,273	5	-	1	6	0.08%
National Shipping Adjusters Inc	NASHA	22	18	25	65	-	-	-	-	0.00%
Nippon Kaiji Kyokai	NKK	2,456	1,875	2,660	6,991	2	1	1	4	0.05%
Overseas Certification Services, Inc	OCS	0	4	4	8	-	-	-	-	0.00%
Panama Bureau of Shipping	PBS	2	2	2	6	-	-	-	-	0.00%
Panama Maritime Documentation Service	PMDS	30	22	83	135	-	-	1	1	0.74%
Panama Maritime Surveyors Bureau	PMS	11	6	26	43	-	-	-	-	0.00%
Polski Rejestr Statkow	PRS	18	19	28	65	-	-	-	-	0.00%
RINA Services S.p.A.	RINA	420	285	537	1,242	-	-	1	1	0.08%
Rinava Portuguesa	RP	20	17	53	90	-	-	-	-	0.00%
Russian Maritime Register of Shipping	RS	30	41	61	132	-	-	-	-	0.00%
Universal Shipping Bureau	USB	6	4	8	18	-	-	-	-	0.00%
International Naval Surveys Bureau	INSB	8	10	16	34	-	1	1	2	5.88%

* Organizations with fewer than five total exams and no detentions may not be listed.



QUALSHIP 21 & E-ZERO

REWARDING YOUR COMMITMENT TO QUALITY, SAFETY AND THE ENVIRONMENT

Information on the eligibility criteria for the QUALSHIP 21 and E-Zero programs, including a listing of qualifying ships, can be found on our website:

<https://www.dco.uscg.mil/Our-Organization/Assistant-Commandant-for-Prevention-Policy-CG-5P/Inspections-Compliance-CG-5PC-/Commercial-Vessel-Compliance/Foreign-Offshore-Compliance-Division/Port-State-Control/QS21/>

QUALSHIP 21

In our continued efforts to ensure safe, secure, and environmentally sound maritime commerce, we offer this program to reward those companies, operators, and vessels that demonstrate the highest commitment to quality and safety through the highest level of compliance with International standards and United States law and regulation.

E-ZERO (ZERO ENVIRONMENTAL DEFICIENCIES OR VIOLATIONS)

The E-Zero program recognizes those exemplary vessels that have consistently adhered to environmental compliance, while also demonstrating an immense commitment to environmental stewardship.



Quality Shipping for the 21st Century (QUALSHIP21) and E-Zero Programs

The Quality Shipping for the 21st Century program, or QUALSHIP 21, recognizes and rewards vessels, as well as their owners and Flag Administrations, for their commitment to safety and quality. To encourage maritime entities to participate, incentives such as certificates, name recognition, and a reduction in PSC examination frequency are offered to participants. The criteria for inclusion are very strict and only a small percentage of all foreign-flagged ships that operate in the U.S. have earned the QUALSHIP 21 designation. The QUALSHIP 21 program ended calendar year 2021 with an enrollment of 3,661 vessels. One previously qualified flag administrations lost their QUALSHIP 21 eligibility over this past year. Vessels from those flag administrations that are currently enrolled in the program will remain enrolled until their QUALSHIP 21 certificates expire.

In 2017, the Coast Guard introduced a new designation within the existing QUALSHIP 21 program called E-Zero. The E-Zero program focuses on environmental stewardship and worldwide compliance with international environmental conventions. Qualifying ships receive a special E-Zero designation on their QUALSHIP 21 certificate. The E-Zero designation is intended to provide a higher level of recognition within the existing QUALSHIP 21 program. By the end of 2020, 220 ships received the E-Zero designation.

Information on the eligibility criteria for the QUALSHIP 21 and E-Zero programs, including a complete listing of qualifying ships, can be found on our website at: <https://www.dco.uscg.mil/cvc>

For the period of July 1, 2022 through June 30, 2023, there are 27 eligible Flag Administrations for the QUALSHIP 21 Program:

Qualified Flag Administrations

Bahamas	France	Jamaica	Philippines
Barbados	Germany	Japan	Republic of Korea
Bermuda	Gibraltar	Liberia	Saudi Arabia
Canada	Greece	Malta	Singapore
Cayman Islands	Hong Kong	Marshall Islands	Spain
China	Isle of Man	Netherlands	United Kingdom
Denmark	Italy	Norway	

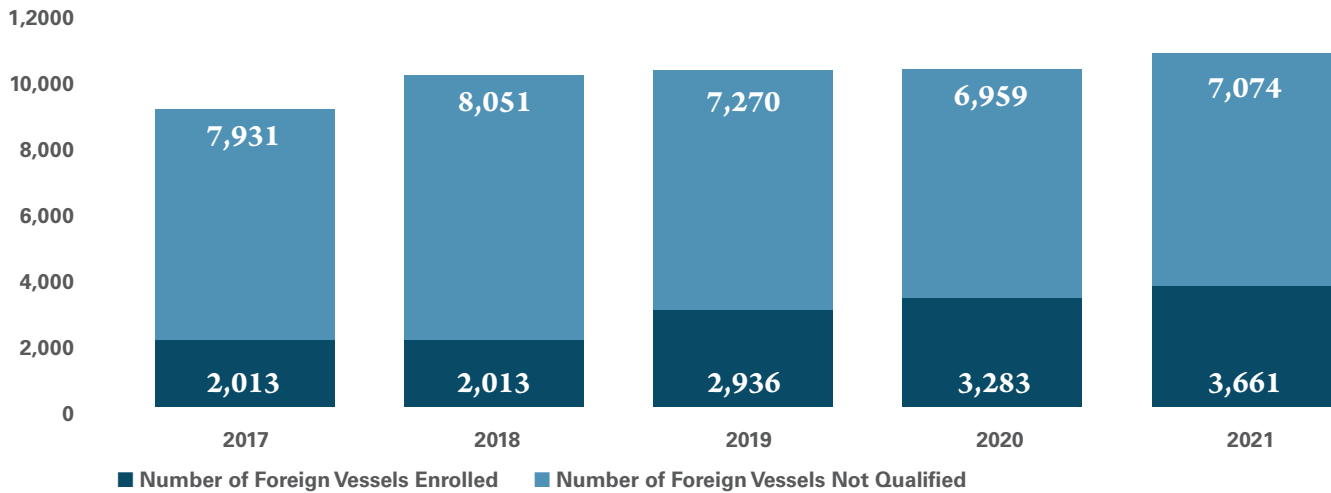
In 2011, the Coast Guard created a list of Flag Administrations that have shown a commitment to excellence in their level of compliance with international standards, but do not meet the full requirements for QUALSHIP 21 eligibility. Specifically, they have not met the requirement of at least 10 PSC examinations per calendar year for the previous three years. The list below contains Flag Administrations that have had at least three PSC safety examinations in each of the previous three years and have not been subject to any PSC detention in that same time period:

British Virgin Islands	India	Moldova	Thailand
Croatia	Libya	Samoa	Taiwan
Curacao	Luxembourg	Sweden	
Finland	Malaysia	Switzerland	

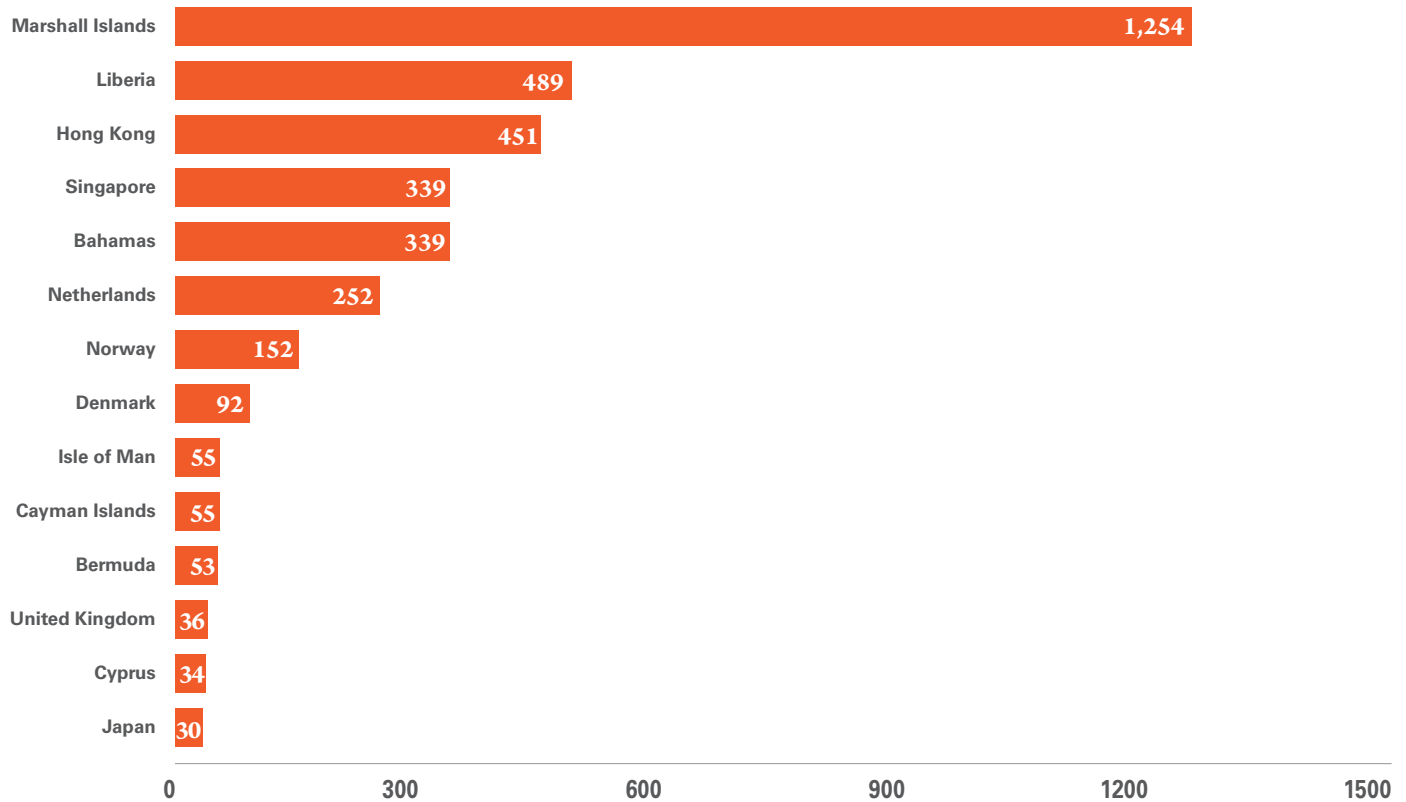
On the following page, please see the table and graph for QUALSHIP 21 enrollment and the number of QUALSHIP 21 vessels by Administration for 2021.

Quality Shipping for the 21st Century

Yearly QUALSHIP 21 Enrollment (2017-2021)



QUALSHIP 21 Vessels by Flag Administration¹



¹ Flag Administrations with 20 or less ships enrolled are not listed.

CHAPTER

3

USCG

Detainable Deficiencies Overview

Below are examples of detainable deficiencies found during PSC examinations in 2021.

Fire Safety: The prevention of fires on board ships will always be an area of particular concern for our PSC program. Fuel leaks, oil soaked lagging, and excessive amounts of oil in the bilges were common observations identified by our PSCOs. Several deficiencies related to fixed firefighting installations were also cited. During one exam, the PSCO observed inadequate water spray coverage due to at least 10 clogged spray nozzles over the vessel's cargo tanks as well as the cargo compressor room. On another vessel, the PSCO identified blocked and clogged foam generators throughout the engine control room making the primary firefighting system unavailable for use during an engine room fire. On another ship, the PSCO observed the supply fan for ventilation located in inside an intrinsically safe area hitting metallic debris and emitting small amounts of smoke into the space. We also recorded numerous deficiencies related to structural fire protection. On one Ro-Ro ship the ventilation ducting for engine room was found holed in multiple locations where it passes through the enclosed cargo deck space allowing for the transmission of smoke or fire between the engine room and the cargo deck.

Safety Management Systems (SMS): The most common cited SMS deficiencies evidenced multiple uncorrected material and/or operational deficiencies identifying the failure of the crew to implement the SMS as it relates to the maintenance of the ship and equipment. SMS related detentions usually resulted from the failure of the master and or crew to report non-conformities to the company. Expanded ISM exams also turned up instances where the vessels were submitting requests to their companies for maintenance and repair support, but could not find evidence of the company taking actions to support the requests. In one case, the PSCO requested to see the vessel's procedures and maintenance checklists for the engine room. The chief engineer provided



daily checklists that were all checked "OK" although the PSCO observed multiple leaks, pooled oil, and oil soaked lagging throughout the engine room. During another exam, a vessel failed to make proper notifications to the Coast Guard of sick crew on board. The vessel was aware of two crew members with COVID-19 like symptoms and failed to report them for two days while in Port. In this case the vessel's SMS clearly stated to report immediately any crew who show signs and symptoms of COVID-19 or flu like illness.

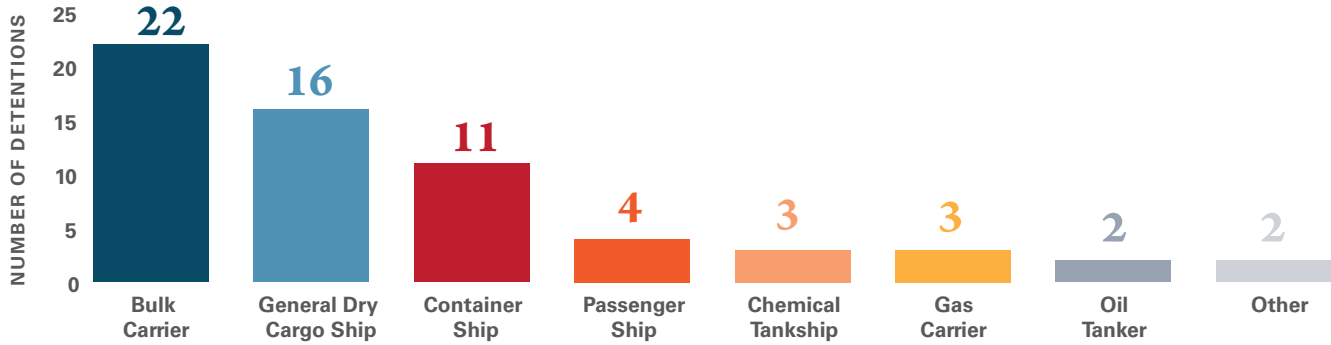
Lifesaving Appliances: Detainable deficiencies related to lifesaving systems nearly doubled over our 2020 totals. Deficiencies related to rescue boats and their state of readiness were most frequently observed. The lack of, or the expiration of food rations contributed to the detention of two vessels. On another vessel, the forward compartment of the rescue boat was found full of water due to a crack in the compartment's hatch cover. There were also instances where the condition of the lifejackets and/or the immersion suits were found deteriorated to such an extent that they had to be removed from the vessel.

Propulsion and Auxiliary Machinery: Deficiencies related to propulsion and auxiliary machinery covered a wide spectrum. However, deficiencies related to fuel leaks on both main and auxiliary engines were the most commonly found. In one case, the leaks were so severe they caused extensive pooling of fuel oil on top of the main engine. There were also a few instances where the PSCO discovered active leaks in the main engine and generator seawater cooling pipes and exhaust leaks from the emergency generators.

**This highlights only a portion of the detainable deficiencies discovered in 2021. The Coast Guard stresses that if any ship's system required by international conventions is not in working condition, the master and crew should take necessary actions to remedy the situation in accordance with their SMS before the ship enters port and report any unresolved issues on their advance notice of arrival.*



Statistics Derived from USCG Port State Control Examinations



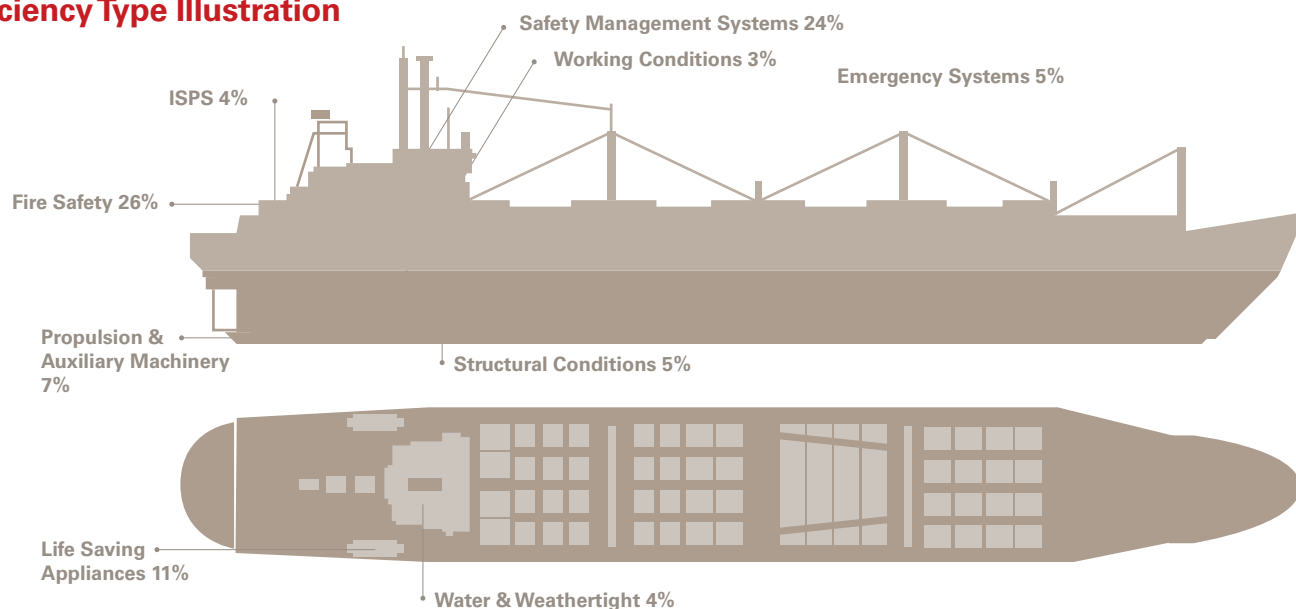
Deficiency and Detention Percentage by Ship Type

Ship Type	Number of Exams	Exams with Deficiencies	Number of Deficiencies	Percent of Exams with Deficiencies	Number of Detentions	Detention %
Bulk Carrier	2,538	655	1,401	25.80%	22	0.86%
Container Ship	1,350	312	644	23.11%	11	0.81%
General Dry Cargo	1,034	281	774	27.17%	16	1.54%
Passenger Ship	168	100	426	59.50%	4	2.38%
Refrigerated Cargo	129	49	105	37.98%	0	0.00%
Gas Carrier	749	152	316	20.29%	3	0.40%
Chemical Tanker	1,253	229	433	18.27%	3	0.23%
Oil Tanker	1,058	163	310	15.40%	2	0.18%
Other	384	97	284	25.26%	2	0.52%

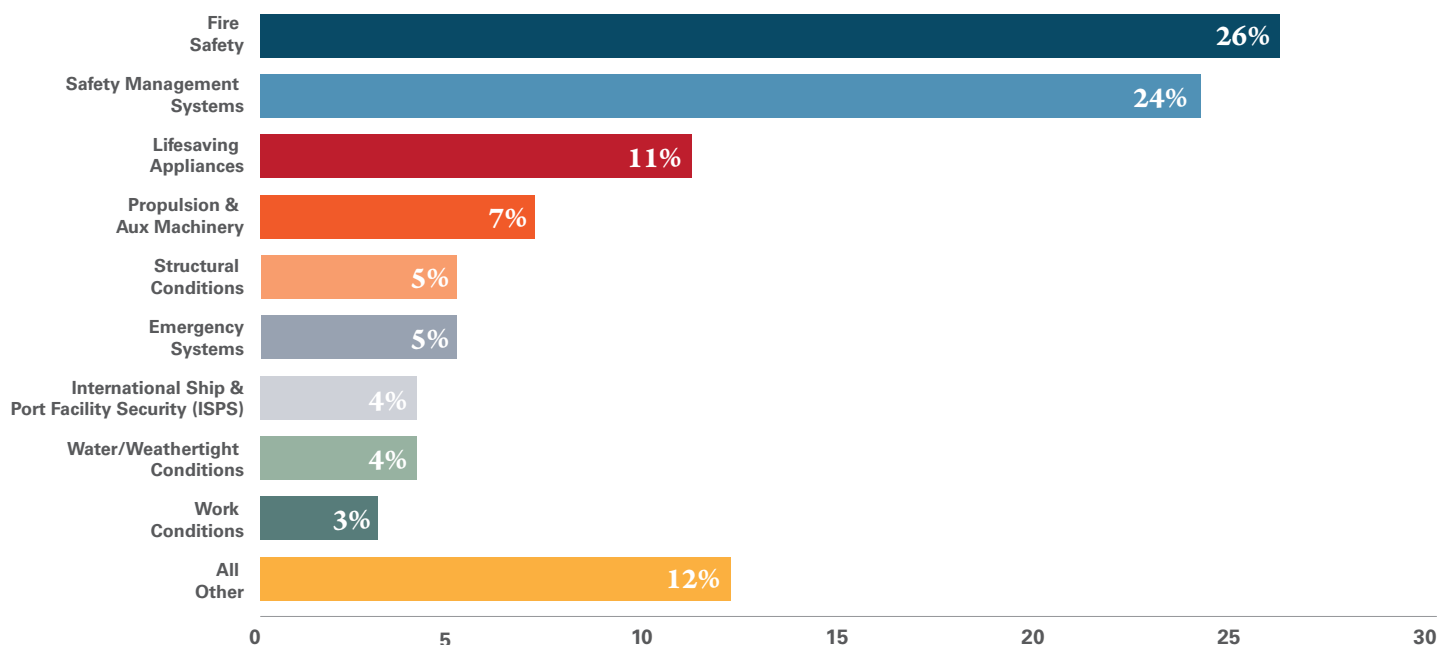


Statistics Derived from USCG Port State Control Examinations

Deficiency Type Illustration



Detentions by Deficiency Type

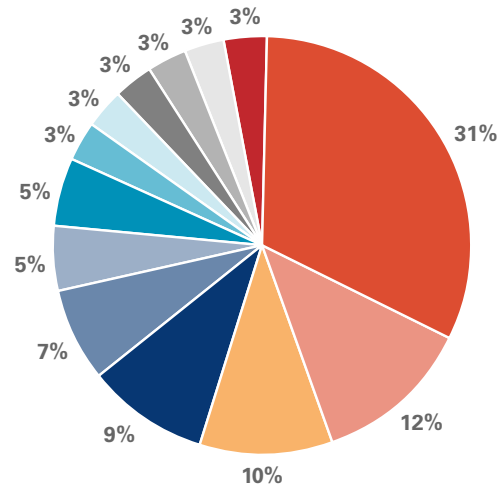


Detention Deficiency Breakdown

Fire Safety

(58 Deficiencies)

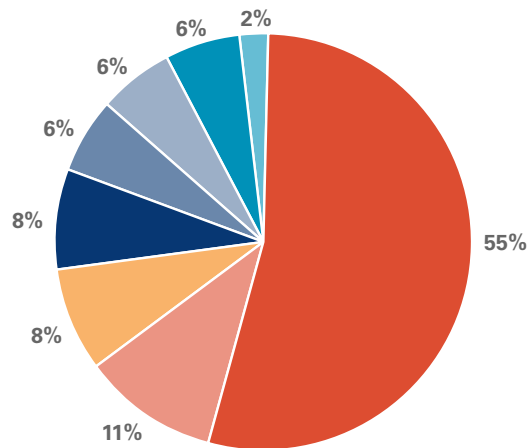
- Oil accumulation in engine room
- All Other
- Fire detection and alarm system
- Operation of fire protection systems
- Ready availability of fire fighting equipment
- Fire prevention structural integrity
- Personal equipment for fire safety
- Means of Escape
- Fire fighting equipment and appliances
- Fire prevention structural integrity
- Remote means of control
- Fire pumps and pipes
- Fire-dampers



Safety Management Systems

(53 Deficiencies)

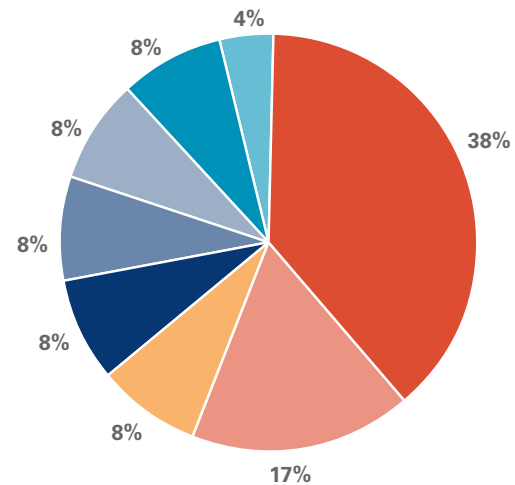
- Maintenance of Ship & Equipment
- Safety & Environmental Policy
- Shipboard Operations
- Other ISM Related Deficiencies
- Company Responsibility & Authority
- Reports of Non-Conformities
- Resources & Personnel
- Company verification (Review & Evaluation)



Life Saving Systems

(24 Deficiencies)

- Immersion Suits
- Rescue Boats
- Maintenance & Inspections
- Lifeboats
- Operational readiness of lifesaving appliances
- Inflatable Liferrafts
- All Other



Deficiencies by Categories

PSC Exam Data Per Category of Deficiencies

Category of deficiency		Number of deficiencies	Percent of total deficiencies
Ship's certificates and documents		244	5.19%
SOLAS	Stability, structure and related equipment	467	9.95%
	Propulsion and auxiliary machinery	409	8.71%
	Alarm signals	73	1.55%
	Fire safety measures	1,383	29.46%
	Life-saving appliances	535	11.39%
	Radiocommunications	35	0.74%
	Safety of navigation	134	2.85%
	Operational deficiencies	23	0.49%
	ISM-related deficiencies	233	4.96%
	ISPS	80	1.70%
	Other	348	7.41%
	MARPOL	Annex I	142
Annex II		0	0.00%
Annex III		2	0.04%
Annex V		28	0.59%
Annex VI		35	0.74%
Operational deficiencies		15	0.31%
STCW	Certification and watchkeeping for seafarers	37	0.78%
Load Lines		69	1.47%
AFS Convention		11	0.23%
ILO		328	6.98%
Other		62	1.32%

Ballast Water Management (BWM)

BWM Compliance Statistics: Compliance with ballast water management regulations continues to be one of the most challenging issues faced by the maritime industry. When a ship reaches its mandatory compliance date, it must comply with the provisions in 33 Code of Federal Regulations Part 151 in order to trade in the United States. While the United States is not signatory to the Ballast Water Convention, the Coast Guard ensures foreign vessels are in compliance with U.S. ballast water laws and regulations in order to further protect our nation's waterways from the threat of invasive species. This year, we launched an Enhanced Exam Program to combat instances of non-compliance with ballast water regulations.

In 2021, the Coast Guard issued nearly double the deficiencies for non-compliance with the regulations over the previous year's numbers. The majority of the deficiencies were issued to vessels with inoperable systems, deficient ballast water management plans, and to those that failed to report mandatory ballast water practices to the National Ballast Water Clearinghouse (NBIC) within specified timeframes. On the positive side, the Coast Guard is seeing a trend of vessels reporting their inoperable systems prior to arrival and a 60% reduction in the number of discharges of non-compliant ballast water into waters of the United States.

BWMS: deficiencies include both inoperable Coast Guard Type Approved systems and accepted Alternative Management Systems.

Implementation Schedule: deficiencies involve vessels that are past their compliance date and using an unapproved BWM method.

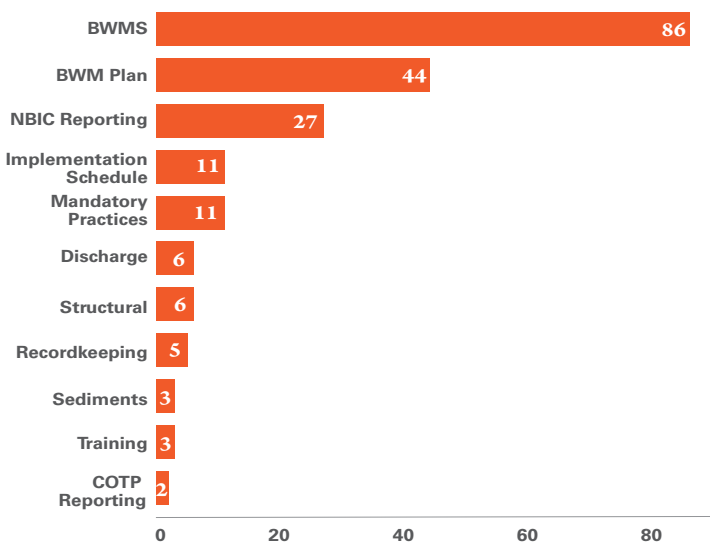
Mandatory Practices: deficiencies include failures to remove hull fouling organisms and marine growth as well as improper uptake of ballast water.

Discharge: deficiencies are issued when a vessel discharges non-compliant ballast water.

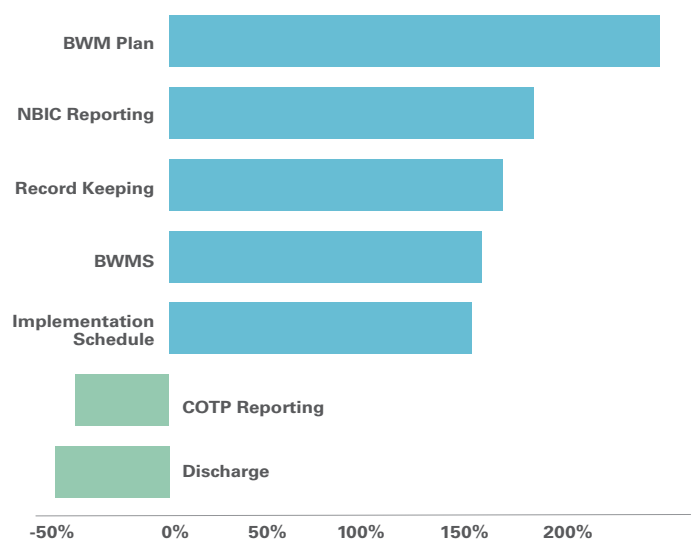
Structural: deficiencies record failures in ballast water tanks and associated piping.

COTP Reporting: deficiencies are issued when a vessel fails to report an inoperable system to the USCG.

2021 Ballast Water Deficiencies



Annual Trend in Ballast Water Deficiencies





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