



PORT STATE CONTROL IN THE BLACK SEA REGION

Annual Report 2018



BLACK SEA PORT STATE CONTROL SECRETARIAT
ISTANBUL / TURKEY

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Foreword

We are pleased to present the eighteenth issue of the Annual Report on Port State Control in the Black Sea region which is published under the auspices of the Port State Control Committee of the Black Sea MOU.

Port State Control is of particular importance to the BS MOU member Authorities due to the role of shipping in region's trade, the sensitivity of the Black Sea basin and its coastline to environmental damage. PSC inspections are conducted to ensure that foreign ships visiting the Black Sea ports are seaworthy, do not pose a pollution risk, provide a healthy and safe environment and comply with relevant international regulations and within the scope of the member Authorities' national governing laws and regulations.

This PSC Annual report covers the period between 1st January and 31st December 2018. During this period the BS MOU member Authorities conducted a total of 5,214 inspections, representing slight 2.0 per cent increase as compared with 5,112 initial inspections in 2017. The regional inspection rate is 72.33% which is 1.26 per cent increase as compared with 2017. A total of 278 detentions were warranted to ships found with serious deficiencies. This represents a detention percentage of 5.33% which is 1.77 per cent decrease as compared with 283 detentions in 2017.

During 2018 a total of 21,450 deficiencies were recorded. The average number of deficiencies per inspection was 5.33; resulting in a 0.21 deficiency point decrease.

The most significant number of operational deficiencies found in 2018 was in the area of safety of navigation, life saving appliances followed by health protection, medical care, social security followed by fire safety measures and structural conditions which constitutes 56.4% of the total deficiencies found.

International Safety Management (ISM) related issues accounted for 6.86 per cent of all detainable deficiencies in the 2018 reporting period which is 0.73 per cent decrease compared with 2017. Thereby this area remains a significant concern and the BS MOU continues to scrutinize vessels coming into region for weaknesses in their Safety Management Systems.

In further promoting safety and environment protection, Concentrated Inspection Campaign(CIC)s are conducted in conjunction with the Paris and Tokyo Memorandas. Between 1st September 2018 and 30th November 2018, a CIC was carried out with respect to the MARPOL ANNEX VI with the Paris MOU, Tokyo MOU, IO MOU and Vinã del Mar Agreement.

Through the launching new inspection scheme the BS MOU will further increase the pressure on the substandard ships to encourage them to improve their performance or to force them to leave the region.

Captain Petrenko DMYTRO
Chairman
BS MOU PSC Committee

Hüseyin YÜCE
Secretary
BS MOU Secretariat

10 Year Summary of Inspection, Detentions and Deficiency Rate

	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Number of Inspections	4,805	4,929	4,657	4,607	5,080	5,092	4,997	5,066	5,112	5,214
Number of Detentions	278	286	249	215	184	151	218	229	283	278
Detention %	5.79	5.80	5.35	4.67	3.62	2.97	4.36	4.52	5.54	5.33

	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Number of Deficiencies	22,885	21,464	19,255	17,916	19,022	18,350	18,094	18,266	21,006	21,450
Deficiencies / Inspection	4.76	4.35	4.13	3.89	3.74	3.60	3.62	3.61	4.11	4.11
Deficiencies / Inspection with Deficiencies	7.12	6.73	6.10	5.97	5.75	6.01	6.40	6.42	6.96	6.91

	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Number of Detainable Deficiencies	1,136	1,251	881	669	630	506	734	822	962	948
Detainable Deficiencies / Detention	4.09	4.37	3.54	3.11	3.42	3.35	3.37	3.59	3.39	3.41

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2018 Annual Report

Overview

The Governments of Black Sea States in the “Strategic Action Plan for the Rehabilitation and Protection of the Black Sea (adopted at the Ministerial Conference held in Istanbul, 30-31 October, 1996) decided to launch a harmonised system of port State control through the adoption of a Memorandum of Understanding on port State control.

The Memorandum of Understanding on Port State Control in the Black Sea Region (BS MOU) was completed and signed in Istanbul, Turkey on 7 April 2000 by representatives of the Maritime Authorities of Bulgaria, Georgia, Romania, the Russian Federation, Turkey and Ukraine.

On December 19, 2000 the Memorandum entered into force in the Black Sea region for three maritime States accepted the BS MOU. By December 12, 2002 the BS MOU entered into effect for all maritime States in the Black Sea, namely: Bulgaria, Georgia, Romania, the Russian Federation, Turkey and Ukraine.

The Port State Control Committee established under the Memorandum monitors and controls implementation and on-going operation of the Memorandum. The Committee consists of representatives of the maritime Authorities of the six member States and observers representatives from the International Maritime Organization (IMO), the International Labour Organization (ILO). The Committee granted observer status to the USCG, Paris MOU, MED MOU, West and Central Africa MOU, Riyadh MOU, the State Maritime Administration of the Republic of Azerbaijan and Commission on the Protection of the Black Sea Against Pollution.

To coordinate daily activity of the organization, on the kind proposal by the Maritime Administration of Turkey, the MOU Authorities decided to establish Headquarter and the Secretariat in Istanbul.

The Russian Federation has developed and launched the Black Sea Information System (BSIS), PSC computerized information system for the Black Sea MOU, basing on the technique used for the Asia Pacific Computerized Information System (APCIS), PSC information system for the Tokyo MOU, which was also developed by the Russian Federation. The BSIS provides necessary tools to assist PSC Officers to conduct inspections. PSC Officers use a comprehensive database which contains data received from a variety of sources on a large number of vessels. This information includes the general particulars of a vessel, and its PSC inspection history.

To provide industry with the MOU news, procedures and inspection results the Black Sea MOU launched the internet web-site at www.bsmou.org containing general information on MOU, regularly updated detention list. Taking into account of successful operation of the BSIS, it was decided to start open publication of PSC inspection results in internet through a direct link to the MOU database providing on-the-fly inspection results.

This annual report outlines recent activities on port State control in the Black Sea region, as well as international perspectives on port State control and includes the statistical port State inspection data conducted by the member Authorities of the BS MOU during the year 2018.

Port State Control Committee

The Nineteenth Meeting of the Black Sea Port State Control Committee was held in Odesa, Ukraine from 17 to 19 April 2018. The meeting was chaired by Mr. Hayri HASANDAYIOGLU - Republic of Turkey.

The meeting was attended by the member Authorities: Bulgaria, Georgia, the Russian Federation, Turkey and Ukraine. Representatives of the Republic of Azerbaijan participated in the meeting as observer. The Mediterranean MOU was represented by the delegation of Turkey.

Observers from the International Maritime Organization (IMO), the International Labour Organization (ILO), USCG, Paris MOU, Abuja MOU, Riyadh MOU and the Commission on the Protection of the Black Sea Against Pollution were not able to attend.

Member Authorities presented information about their national arrangements for port State control activities, including important organizational changes and availability of dedicated PSC structures.



The Committee noted the information provided by the Secretariat on the status of ratification of or accession to the relevant instruments by the Authorities in the Black Sea region and was further informed of the following updates:

- Bulgaria implemented that the BWM Convention on 30 June 2018
- Turkey informed that domestic procedures for MLC ratification completed and act for ratification of MLC 2006 has been forwarded to its Parliament for approval;
- Georgia informed that MLC 2006 Convention not ratified yet, decision on the ratification is expected to be taken soon; and
- Ukraine informed that technical translation of the BWM Convention is in progress; national procedures for ratification of MLC 2006 had been completed; ratification will be made soon.

The Committee urged those member Authorities who have not yet acceded to the relevant instruments to do so as soon as possible, and agreed;

- to report on the current status of the MLC 2006 and BWM convention;
- to instruct the Secretariat to check with each Authority and observer States, the progress of ratification of MLC,2006 and BWM when preparing the table, and also incorporation of the expected date of deposits of these Conventions; and
- to invite member Authorities concerned to ratify MLC 2006 and BWM Conventions

The Committee considered outcome of the studies carried out by the Secretariat

- on the incorporation of the criteria for observer and associate membership in the Manual as a Guidance, with slight amendment to the MOU text;
- review of the Memorandum in the light of the new inspection regime and inspection scheme; and
- agreed to entrust the Secretariat to make amendment proposal to the Memorandum and respective annexes with the support by the Russian Federation and Turkey.

Revisions to the Guidelines due to up-dates during 50th meeting the Paris MOU, and due to new inspection scheme, if any:

- Guideline ISM Code
- Guidelines for PSCO's on checking compliance with LRIT
- Guidelines Maritime Labour Convention 2006
- Guidelines for the Detention Review Board

Revision due to new inspection scheme e.g. incorporation of expanded inspection based upon review of the remaining respective Paris MOU PSCC Instructions:

- Guidelines for the PSCO on the ISM Code
- Guidelines for the PSCOs on LRIT
- Guidance Maritime Labour Convention, 2006
- Detention Review Board Procedures

The Committee considered follow-up inspection scheme in the light of new inspection scheme, there will be three type of inspections: initial, detailed and expanded inspection and necessity to verify harmonization of the coding system with the Paris MOU and Tokyo MOU.

The Committee considered the report on the concentrated inspection campaign (CIC) on the Safety of Navigation and future CICs and agreed to:

- approve report of the 2017 CIC on the Safety of Navigation including ECDIS;
- carry out CIC on on MARPOL Annex VI in 2018 jointly with the Paris and Tokyo MOUs; the arrangements for the subject CIC.

The Committee unanimously elected Captain Dmytro PETRENKO (Ukraine) and Captain Alexandar ILIEV (Bulgaria) as Chairman and Vice Chairman of the Committee.

The Committee agreed to conduct the BS MOU Port State Control Committee 20th meeting in Burgas, Bulgaria on April 2019.

Black Sea Information System (BSIS)

The Black Sea Information System has been established in the Russian Federation, for the purpose of exchanging information on port State inspections, in order to make available to Authorities information on inspection of ships in other regional ports to assist them in their selection of foreign flag ships to be inspected and in the exercise of port State control on selected ships; and provide effective information exchange facilities regarding port State control in the region.

As the further step for providing more transparent and timely information on the BS MOU PSC activities, the Committee gave its approvals to on-line publication of the ship risk profile, PSC inspection and detention data on the Memorandum web-site.

Concentrated Inspection Campaign

From 1st September 2018 to 30th November 2018, the BS MOU carried out a Concentrated Inspection Campaign (CIC) on MARPOL Annex VI. This campaign involved all member States of the BS MOU and was conducted in conjunction with the Paris MOU, Tokyo MOU, IO MOU and Vinã Del mar Agreement. The Paris MOU Guidelines and Questionnaire were utilized.

During the campaign, a total of 781 inspections were carried out with the CIC questionnaire involving 781 individual ships. Of this quantity 55 ships were detained without detentions within the CIC scope.

A total of 139 questionnaires had at least a non-compliance to a requirement, resulting 17.8 per cent of CIC inspections. The overall average per cent of non-conformities was 6.62.

Most inspections were carried out on board ships flying the flags of Panama with 128 (16.39%) inspections, Marshall Islands with 90 (11.52%) inspections, Malta with 80 (10.24%) inspections and Turkey with 70 (7.12%) inspections.

Concentrated Inspection Campaign in 2019

The Committee agreed to participate into the CIC on Emergency Systems during the period of 1st September to 30th November 2019 and to request the Secretariat to report progress and developments on the 2019 CIC.

Training

One PSCO from Turkey into the Paris MOU Expert Training on Safety of Environment, the Hague the Netherlands 28 February - 2 March 2018. One PSCO from Turkey into the Paris MOU Specialized training on the Inspection of Bulk Carriers, the Hague, The Netherlands 20-23 March 2018. One PSCO from (Georgia) 8th General Training Course for PSCOs, Yokohama, Japan, 20 August - 14 September 2018.

PSCO Exchange Programme

Within the scope of the regional and interregional PSCO Exchange Programmes four PSC officer exchanges were conducted in 2018, two PSCOs from Georgia visited Bulgaria and two PSCO from the Russian Federation visited Turkey.

Interregional Cooperation

The BS MOU currently has 6 members, some with dual or even triple membership: Bulgaria, Romania and the Russian Federation with the Paris MOU, while the Russian Federation is also a member of the Tokyo MOU, with Turkey there is further tie with the MED MOU.

In order to further strengthen co-operation with IMO, an agreement for co-operation was concluded with IMO, as an Intergovernmental Organization, which allows the BS MOU (and other MOUs) to submit papers and attend IMO meetings in its own rights. The BS MOU is represented by Secretariat at the IMO III sub-committee meetings and submitting its reports.

The BS MOU is accepted as an observer to several regional PSC agreements, that is, Paris MOU, Tokyo MOU, Mediterranean MOU, Viña del Mar Agreement, and Indian Ocean MOU.

The BS MOU was represented by the Secretary at the Paris MOU PSCC51 meeting which was held in Cascais, Portugal, from 7 to 11 May 2018.

The BS MOU were represented by the Russian Federation at the PSCC21 meeting of the IOMOU and PSCC29 meeting of the Tokyo MOU which were held in Fremantle, Australia from 6 to 10 August 2018, and Hangzhou, China from 5 to 8 November 2018.

The BS MOU represented by Turkey at the 32nd meeting of the Paris MOU Technical Evaluation Group, which were held in the Cornwall, Canada from 4-7 December 2018.

PSC Inspections 2018

Regional Inspection Data

During the 2018 calendar year 5,468 individual ships visited inspection ports in the Black Sea region in which 3,819 (69.84%) individual ships inspected and 241 (6.31%) individual ships detained. The number of individual ships inspected in 2018 (3819) increased 3.0 per cent compared with the number of individual ships inspected in 2017 (3,707) despite to 4.8 per cent decrease of the individual ship visits in 2018 as compared with 5,216 individual ship visits in 2017.

5,214 inspections carried out onboard 3,819 individual ships registered by 79 flag Administration. The number of inspections in 2018 (5,214) increased compared with 2017 (5,112).

The overall detention percentage in the region was 5.54% in 2017; in 2018 it decreased up to 5.33% as a per cent of inspections, rather than the number of individual ships inspected to take into account that many ships are detained more than once during any one year. Regional detention rate (percentage of number of individual ships inspected) 6.31% is which is higher than 5.75% in 2017.

The number of ships detained in 2018 for deficiencies clearly hazardous to safety, health or environmental amounted to 278. It compares with the number of detained 283 in 2017, 223 in 2016. Number of inspections increased 102 (2.0%), total number of detentions decreased 5 (1.7%) which resulted 0.21 per cent decrease in detention percentage in 2018. Table 1 displays summary of the 2018 inspection data and observed changes compared with the previous year.

Table 1- Summary of 2018 Inspection and Trends as Compared with the Previous Year

		2017	2018	Change Compare 2017
Ships Visits	Individual Ships	5,216	5,468	252 (4.83%)
Inspections	Total PSC Inspections	5,112	5,214	102 (2.00%)
	Inspection with Deficiencies	3,018	3,103	85 (2.82%)
	Individual Ships	3,707	3,819	112 (3.02%)
	Inspection Rate	71.07%	72.33%	1.30%
Detentions	Individual Ships	258	241	-17 (-6.59%)
	Total Detentions	283	278	-5 (-1.77%)
	Detentions Rate	5.75%	6.31%	0.56%
	% of Total Inspections	5.54%	5.33%	-0.21%
	% Inspections with Deficiencies	59.04%	59.51%	0.47%
Deficiencies	Total Deficiencies	21,006	21,450	444 (2.11%)
	Detainable Deficiencies	962	948	-14 (-1.46%)
	Deficiency Rate	4.11	4.11	0.00
	Detainable Deficiency / Detention	3.40	3.41	0.01
	RO Related Detainable Deficiency	29	18	-11 (-37.93%)

Inspection Data by Authority

The BS MOU member Authorities contributions into the regional inspection efforts displayed with Table 2. Member Authorities inspection rates (percent of number of individual ships inspected) varied between 23.7% and 69.8%. Figure 1 displays inspection and detention rates for 2018 by member Authorities and in the region. Detention percentage of the member Authorities are varied from 1.8 to 9.3 per cent. Per cent of inspections with deficiencies varies from 36.2 per cent up to 76.4 per cent in the region. As a result of shipping activity the greatest number of PSC inspections were undertaken in the Russian Federation and Ukraine ports in 2018.

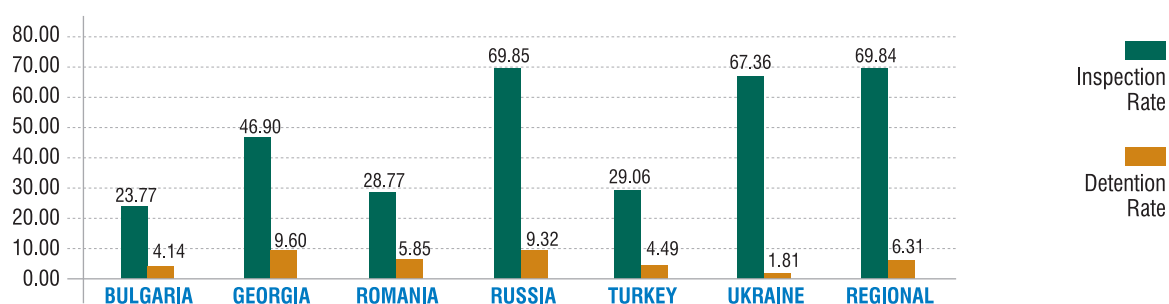
Table 2- Inspection Data by Authority and Region

AUTHORITY	NUMBER OF INDIVIDUAL SHIP VISITS	NUMBER OF INDIVIDUAL SHIPS INSPECTED	NUMBER OF INSPECTIONS	NUMBER OF INSPECTIONS WITH DEFICIENCIES	NUMBER OF DEFICIENCIES	NUMBER OF DETENTIONS	NUMBER OF INDIVIDUAL SHIPS DETAINED	INSPECTION RATE ⁽³⁾	DETENTION RATE ⁽⁵⁾	DETENTION PERCENTAGE ⁽⁴⁾	% OF INSPECTIONS WITH DEFICIENCIES	AVERAGE NO. OF DEFICIENCIES PER INSPECTION	% OF MOU TOTAL	DETENTIONS WITH RO RELATED DETAINABLE DEFICIENCIES
Bulgaria ⁽²⁾	1,321	314	331	228	1,208	13	13	23.77	4.14	3.93	68.88	3.65	6.35	1
Georgia	533	250	272	208	1,619	24	24	46.90	9.60	8.82	76.47	5.95	5.22	3
Romania ⁽²⁾	1,724	496	534	394	2,130	29	29	28.77	5.85	5.43	73.78	3.99	10.24	5
Russia ⁽¹⁾	2,196	1,534	1,879	1,386	11,762	166	143	69.85	9.32	8.83	73.76	6.26	36.04	2
Turkey ⁽¹⁾	1,225	356	403	238	1,341	18	16	29.06	4.49	4.47	59.06	3.33	7.73	3
Ukraine	2,292	1,544	1,795	649	3,390	28	28	67.40	1.80	1.60	36.20	1.90	34.43	4
Regional	5,468	3,819	5,214	3,103	21,450	278	241	69.84	6.31	5.33	59.51	4.11		18

⁽¹⁾ Data only Black Sea Ports, ⁽²⁾ Inspection data reported to the Paris MOU, ⁽³⁾ Individual ships inspected as per cent of individual ships visited,

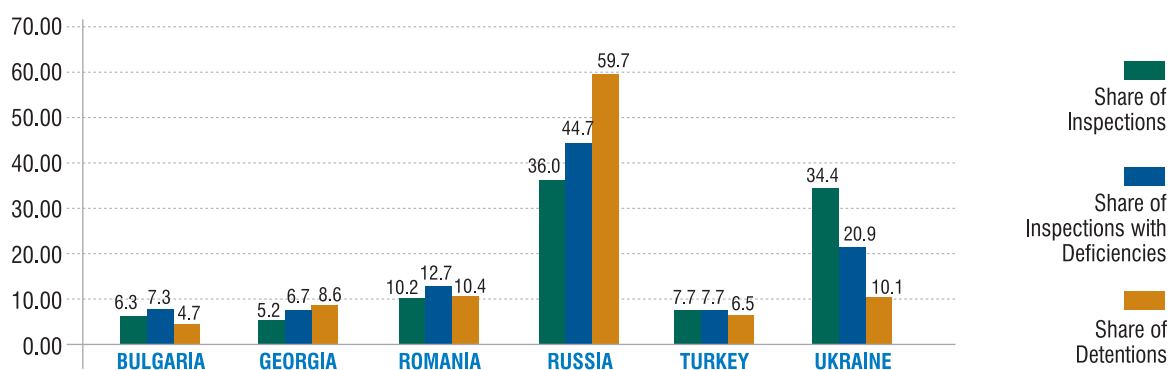
⁽⁴⁾ Individual ships detained as per cent of individual ships inspected, ⁽⁵⁾ Detentions as per cent of inspections.

Figure 1- Inspection and Detention Rates by Authority and Region



In order to determine level of contributions of the member Authorities into the regional inspections, share of inspections, share of inspections with deficiencies and share of detentions presented in Figure 2.

Figure 2- Share of Inspections, Inspections with Deficiencies and Detentions of Members as Percentage of Regional Total



Breakdown of inspections by ship risk profile presented in Table 3. Majority of the inspected ships are standard risk ship (SRP)s 3,487 (66.9%), followed by high risk ship (HRS)s 1014 (19.4%).

Table 3- Inspection Data by Ship Risk Profile

AUTHORITY	SHIP RISK PROFILE (SRP)								TOTAL NUMBER OF INSPECTIONS
	HRS		SRS		LRS		SRP UNKNOWN		
	NUMBER	%	NUMBER	%	NUMBER	%	NUMBER	%	
Bulgaria	71	21.50	226	68.30	33	10.00	6	1.80	331
Georgia	68	25.00	185	68.00	17	6.30	0	0.00	272
Romania	142	26.60	328	61.40	61	11.40	1	0.20	534
Russian Federation	298	15.90	1,256	66.80	323	17.20	2	0.10	1,879
Turkey	106	26.30	265	65.80	32	7.90	0	0.00	403
Ukraine	329	18.30	1,227	68.40	239	13.30	0	0.00	1,795
REGION	1,014	19.40	3,487	66.90	705	13.50	9	0.20	5,214

Inspection Data by Flag

2018 Inspections were carried out on ships registered under 80 flags. The flag State with largest number of ships inspected in the region was Panama with 835 (16.01%) inspection followed by Malta with 533 (10.22%) and Marshall Islands with 496 (9.51%) which constitute 1,864 (35.75%) of total inspections. Table 4 presents top 5 PSC inspections by flags in 2017 and in 2018.

Table 4- Top 5 Inspections by Flag of the Ships

FLAG	2017		2018		DIFFERENCE		2016-2018
	NUMBER	SHARE	NUMBER	SHARE	NUMBER	%	SHARE
Panama	758	14.83%	835	16.01%	77	10.20%	14.87%
Malta	563	11.01%	533	10.22%	-30	-5.30%	11.14%
Marshall Islands	446	8.72%	496	9.51%	50	11.20%	8.99%
Liberia	428	8.37%	474	9.09%	46	10.70%	8.34%
Turkey	362	7.08%	349	6.69%	-13	-3.60%	7.39%

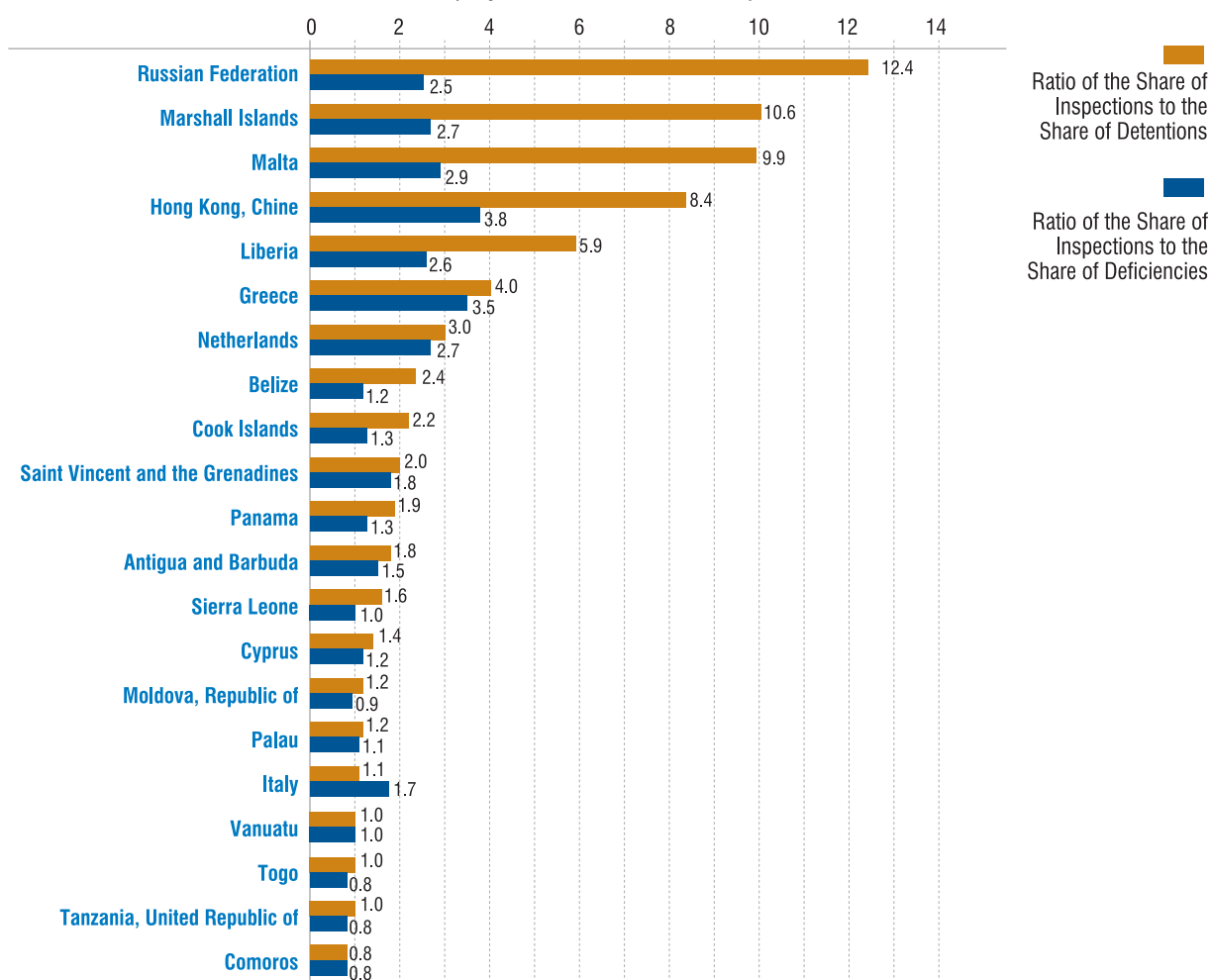
In 2018, ships registered under 39 foreign flags were observed to have deficiencies sufficiently serious to impair the seaworthiness and warrant detention. High detention percentage observed Comoros (18.18%), followed by Tanzania (15.65%) and Togo (15.33%) flagged vessels. Table 5 illustrates inspections data by flags exceeding average detention percentage (with inspections more than 20).

Figure 3 presents ratio of the share of inspections to the share of detentions and deficiencies which indicates relative level of the detention and deficiencies. The Russian Federation, followed by Marshall Islands, Malta and Hong Kong, China performing well concerning detentions. Hong Kong, China, Greece, followed by Malta and Marshall Islands, Netherlands performing well concerning deficiencies.

**Table 5- 2018 Detentions Per Flag, Exceeding Average Detention Percentage
(Number of Inspections > 20, with a Detention Percentage Exceeding 5.33%)**

FLAG	NUMBER OF INSPECTIONS	NO. OF INSPECTIONS WITH DEFICIENCIES	NUMBER OF DEFICIENCIES	NUMBER OF DETENTIONS	% OF INSPECTIONS WITH DEFICIENCIES	DETENTION % 2018	EXCESS OF AVERAGE 2018	DETENTION % 2017	EXCESS OF AVERAGE 2017
Antigua and Barbuda	94	54	435	8	57.40	8.51	3.18	5.33	-0.21
Belize	111	84	618	7	75.70	6.31	0.97	10.74	5.20
Comoros	121	100	1024	22	82.60	18.18	12.85	16.67	11.13
Cook Islands	118	87	608	8	73.70	6.78	1.45	11.94	6.40
Cyprus	48	28	259	5	58.30	10.42	5.08	0.00	-5.54
Italy	60	34	237	8	56.70	13.33	8.00	1.67	-3.87
Moldova, Republic of	112	97	840	14	86.60	12.50	7.17	12.20	6.66
Palau	63	52	393	8	82.50	12.70	7.37	11.11	5.57
Panama	835	527	4344	66	63.10	7.90	2.57	7.67	2.13
Saint Vincent and the Grenadines	40	23	150	3	57.50	7.50	2.17	7.50	1.96
Sierra Leone	116	100	746	11	86.20	9.48	4.15	15.91	10.37
Tanzania, United Republic of	147	131	1287	23	89.10	15.65	10.31	12.35	6.81
Togo	137	123	1091	21	89.80	15.33	10.00	15.65	10.11

**Figure 3- Ratio of the Share of Inspections to the Share of Detentions and Deficiencies by the Flags
(Inspections > 30 Detentions > 2)**

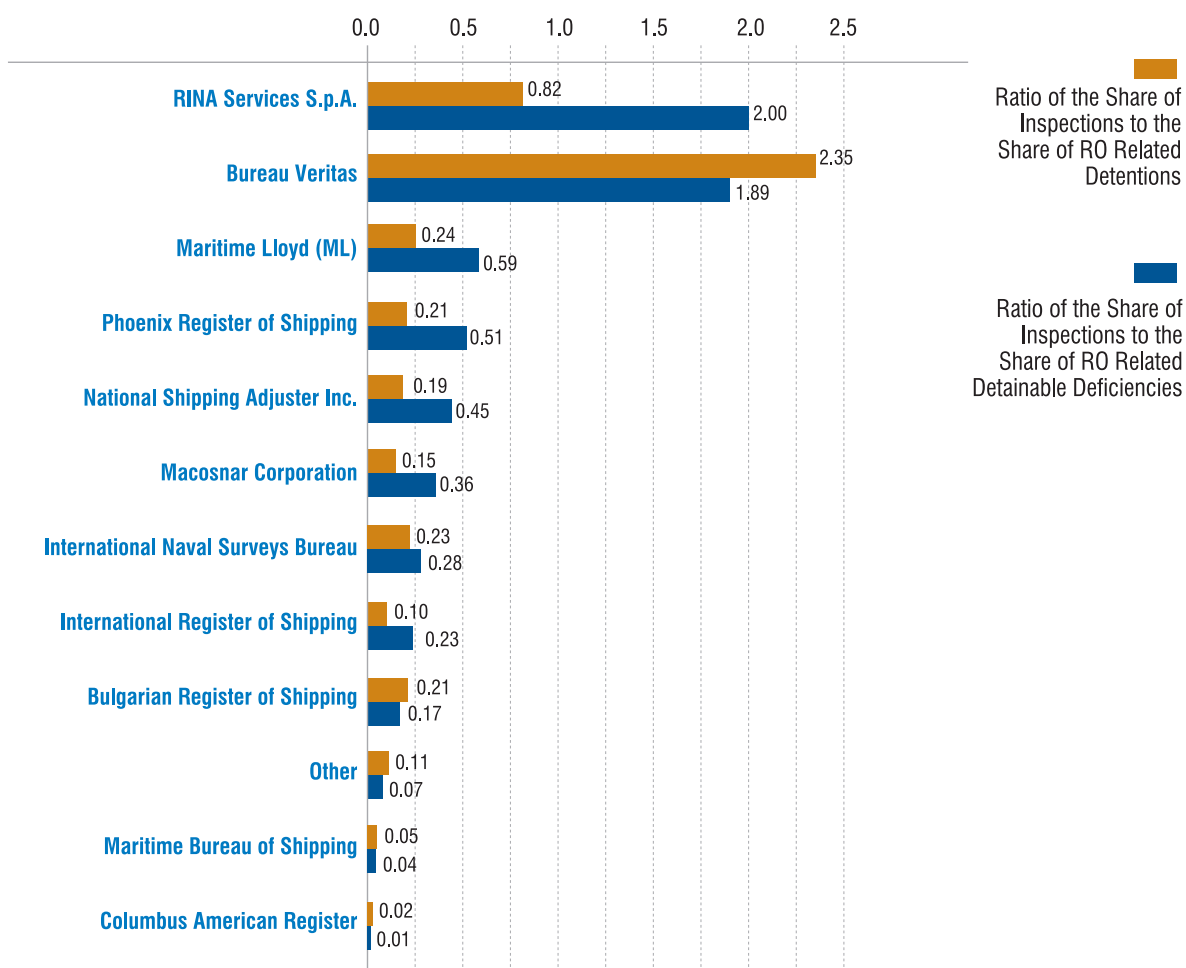


Inspection Data by Recognized Organization

The majority of ships inspected are in class with the Nippon Kaiji Kyokai 1095 (14.4%), DNV GL AS 1075 (12.3%), Bureau Veritas 922 (11.4%), Lloyd's Register 832 (11.1%), and followed by American Bureau of Shipping 554 (7.4%) and Russian Maritime Register of Shipping 505 (6.7%).

Figure 4 presents ratio of the share of inspections to the share of RO related detentions and share of RO related detainable deficiencies. Interregional Register of Shipping, Maritime Bureau Shipping Columbus American Register have high share of RO related detentions and high share of RO related detainable deficiencies compare to the share of inspections.

Figure 4- Ratio of the Share of Inspections to the Share of RO Related Detentions and to the Share of RO Related Detainable Deficiencies (Inspections with RO Related Detentions)



Inspection Data by Ship Type

When considering the breakdown of ships inspected by ship type, largest group of the ship inspected during 2018 were general cargo/multi purpose ships with 1,890 (36.2%) inspections; bulk carrier 1,850 (35.5%) and oil tanker 619 (11.9%) were also inspected which represent 83.6 per cent of inspections. 2018 top 5 inspection by ship type presented below.

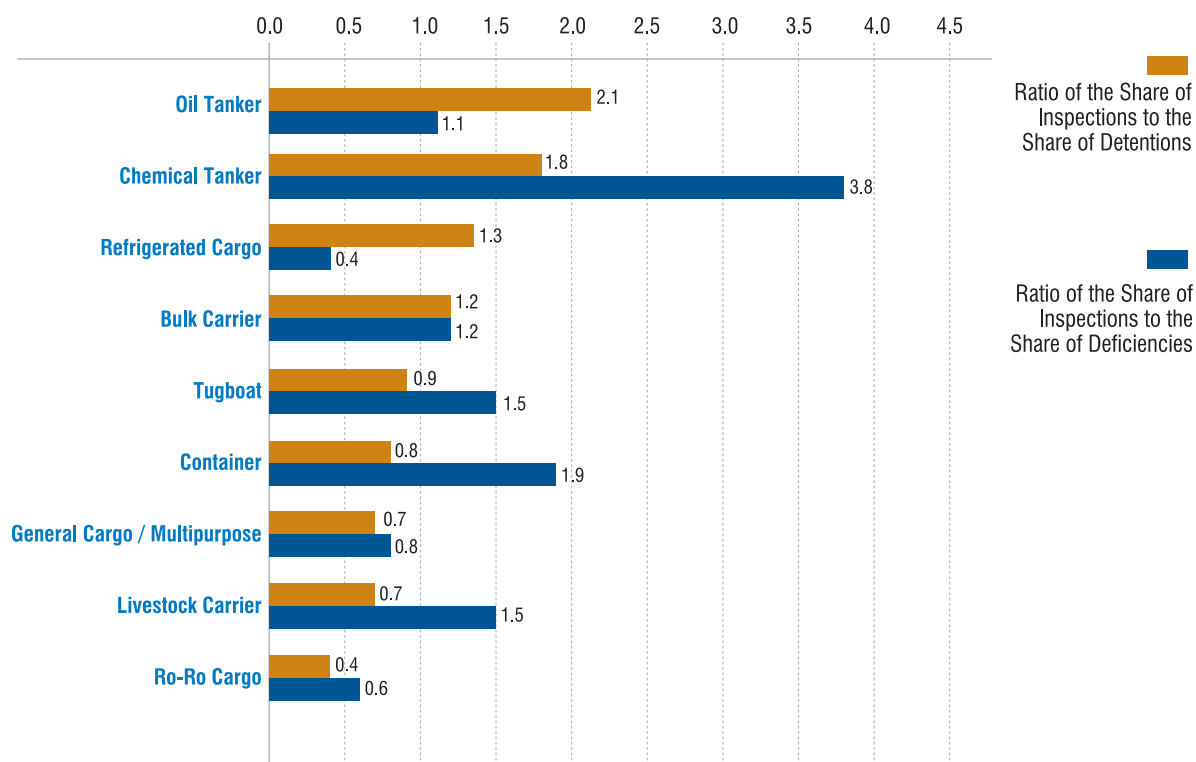
SHIP TYPES	2017		2018		DIFFERENCE		2016-2018
	NUMBER	SHARE	NUMBER	SHARE	NUMBER	%	SHARE
General Cargo/Multipurpose Ship	1,915	37.46%	1,890	36.20%	-25	-1.31	37.13%
Bulk Carrier	1,779	34.80%	1,850	35.50%	71	3.99	34.86%
Oil Tanker	644	12.60%	619	11.90%	-25	-3.88	12.53%
Chemical Tanker	352	6.89%	386	7.40%	34	9.66	7.05%
Container	145	2.84%	175	3.40%	30	20.69	3.10%

Majority of detained ships were type of general cargo/multi purpose ships with 164 (59.0%) detentions, bulk carriers with 66 (23.7%) detentions and oil tanker with 14 (5.0%) detentions, followed by chemical tanker with 3 (1.1%) detentions, which were accounted for 88.8 per cent of the total detentions.

Higher per cent of detentions were with Ro-Ro cargo ship (20.6%), general cargo/multi-purpose ships (8.7%), followed by livestock carrier (5.3%), and tugboat (3.6%) (number of inspections more than 10).

Figure 5 shows how the ship types inspected performed with regards to detentions and deficiencies. Higher share of detentions and deficiencies compared with share of inspections indicated that type of ship underperforming with respect to detentions and deficiencies.

Figure 5- Share of Inspections to the Share of Detentions and Share of Deficiencies for Ship Types with Detentions



Inspection Data by Deficiency

A total of 21,006 deficiencies were recorded during the port State control inspections in 2017. Majority of the deficiencies found upon inspection in 2017 were related to safety of navigation (16.4%), life saving appliances (13.3%), fire safety measures (10.4%) and health protection, medical care, social security (9.1%). These four categories make up 49.2% of the total deficiencies found. Top 5 category of deficiencies presented below.

CATEGORY OF DEFICIENCIES	2017		2018		DIFFERENCE		2016-2018
	NUMBER	SHARE	NUMBER	SHARE	NUMBER	%	SHARE
Safety of Navigation	3,446	16.40%	3,394	15.80%	-52	-0.60%	16.39%
Life Saving Appliances	2,800	13.30%	3,199	14.90%	399	1.60%	14.26%
Health Protection/Medical Care/Social Security	1,910	9.10%	2,133	8.50%	223	-0.60%	8.74%
Fire Safety	2,176	10.40%	1,912	8.90%	-264	-1.40%	9.77%
Certificate and Documentation - Documents	1,292	6.20%	1,780	8.30%	488	2.10%	6.99%

Number of ISM related detainable deficiencies were 544 which accounted for 2.54 per cent of the deficiencies, 256 marine pollution MARPOL Annex I related deficiencies observed accounting 1.19 per cent of the total deficiencies.

A total 948 detainable deficiencies and 46 RO related detainable deficiencies were recorded during the port State control inspections. 4.4 per cent of total deficiencies in 2018 were detainable deficiencies, 4.8 per cent of detainable deficiencies in 2018 were RO related.

Majority of the detainable deficiencies found upon inspections in 2018 were related to fire safety (14.5%), lifesaving appliances (14.3%), emergency system (14.0%) followed by safety of navigation (11.9%). These five categories make up 64.6% of the total detainable deficiencies found in 2018. Top 5 category of detainable deficiencies presented below.

DETTAINABLE DEFICIENCIES	2017		2018		DIFFERENCE		2016-2018
	NUMBER	SHARE	NUMBER	SHARE	NUMBER	SHARE	SHARE
Fire Safety	120	12.50%	137	14.50%	17	2.00%	13.00%
Life Saving Appliances	125	13.00%	136	14.30%	11	1.40%	13.40%
Emergency Systems	132	13.70%	133	14.00%	1	0.30%	13.70%
Safety of Navigation	135	14.00%	113	11.90%	-22	-2.10%	14.20%
Structural Conditions	80	8.30%	94	9.90%	14	1.60%	8.80%

Majority of the RO related detainable deficiencies found upon inspection in 2018 were related to fire safety (26.1%), Structural Condition (23.9%), Emergency Systems (10.9%), safety of navigation (10.9%) and followed by ISM (8.7%). These five categories make up 80.4% of the total RO related detainable deficiencies found.

2018 Maritime Labour Convention Results

MLC, 2006 compliance is verified during 2,744 PSC inspections carried out in 2018 by Bulgaria, Romania and the Russian Federation and the results are presented in Table 6. This table identifies the number of MLC 2006-related deficiencies, detainable deficiencies and detentions by ship flag, ship type and ship age.

PSCOs from Bulgaria, Romania and the Russian Federation identified 2,734 deficiencies related to MLC 2006 issues. This represented 18.1 per cent of the total deficiencies issued and equated to 1.0 deficiency per inspection.

Of the 653 detainable deficiencies 51 were related to MLC detainable deficiencies. This represented 23.2 per cent of the total detainable deficiencies. Of the 208 detentions 40 (19.2%) were due to the MLC, 2006 related detainable deficiencies which resulted 1.46 detention percentage.

Table 6- 2018 MLC Results by Ship Flag, Ship Type and Ship Age

SHIP FLAG	Number of Inspections	Total Deficiencies	MLC Deficiencies	Total Detainable Deficiencies	MLC Detainable Deficiencies	Total Detentions	MLC Detentions
Antigua and Barbuda	35	237	39	13	1	5	1
Comoros	61	720	134	77	3	15	3
Cook Islands	45	382	75	30	4	8	3
Cyprus	30	230	55	8	1	5	1
Greece	85	192	31	10	1	4	1
Italy	43	213	30	9	1	8	1
Jordan	1	20	4	3	1	1	1
Liberia	275	913	170	21	2	9	2
Malta	296	955	186	19	3	8	2
Marshall Islands	278	1,067	169	13	1	7	1
Moldova, Republic of	50	542	86	40	6	11	3
Panama	390	3,067	573	147	14	50	10
Tanzania, United Republic of	78	762	144	32	6	12	5
Togo	85	790	141	70	3	16	3
Ukraine	15	120	18	26	2	3	1
Vanuatu	946	4,639	831	118	0	40	0
Others	1,252	4,177	808	54	0	28	0
TOTALS	2,744	15,100	2,734	653	51	208	40

SHIP TYPE	Number of Inspections	Total Deficiencies	MLC Deficiencies	Total Detainable Deficiencies	MLC Detainable Deficiencies	Total Detentions	MLC Detentions
Bulk Carrier	846	4,878	911	158	8	62	7
Container	121	653	153	11	2	5	2
General Cargo / Multipurpose	846	6,654	1,244	398	27	104	20
Livestock Carrier	27	181	39	14	1	2	1
Oil Tanker	508	1,025	134	24	5	13	4
Ro-Ro Cargo	65	703	102	40	8	17	6
Other Types	331	1,006	151	8	0	0	0
TOTALS	2,744	15,100	2,734	653	51	208	40

SHIP AGE	Number of Inspections	Total Deficiencies	MLC Deficiencies	Total Detainable Deficiencies	MLC Detainable Deficiencies	Total Detentions	MLC Detentions
0 - 5	358	752	137	9	2	7	2
6 - 10	666	2,605	456	47	3	22	3
11 - 15	535	2,402	416	50	5	24	2
16 - 20	293	1,634	273	63	8	24	7
21 - 24	221	1,852	353	73	3	26	3
25 - 29	163	1,296	232	81	5	24	4
30 - 34	190	1,697	322	109	6	31	4
35 +	318	2,862	545	221	19	50	15
TOTALS	2,744	15,100	2,734	653	51	208	40

Port State Inspection Data for 2018

Table 7- Inspection Data by Flag

FLAG	NUMBER OF INSPECTIONS	NUMBER OF INSPECTIONS WITH DEFICIENCIES	NUMBER OF DEFICIENCIES	NUMBER OF INSPECTIONS WITH DETENTIONS	NUMBER OF INDIVIDUAL SHIPS INSPECTED	DETENTION PERCENTAGE	% OF INSPECTIONS WITH DEFICIENCIES
Algeria	8	3	33	0	0	0.00	37.50
Antigua and Barbuda	94	54	435	8	19	8.51	57.45
Azerbaijan	16	9	55	0	0	0.00	56.25
Bahamas	96	45	318	2	2	2.08	46.88
Barbados	17	13	74	0	0	0.00	76.47
Belgium	4	2	11	0	0	0.00	50.00
Belize	111	84	618	7	27	6.31	75.68
Bermuda (GB)	2	1	6	0	0	0.00	50.00
Bulgaria	20	15	103	1	4	5.00	75.00
Cambodia	3	2	7	0	0	0.00	66.67
Cameroon	1	1	3	0	0	0.00	100.00
Canada	1	1	4	0	0	0.00	100.00
Cayman Islands (GB)	11	6	35	0	0	0.00	54.55
Chile	1	1	3	0	0	0.00	100.00
China	7	5	30	0	0	0.00	71.43
Comoros	121	100	1,024	22	100	18.18	82.64
Cook Islands	118	87	608	8	30	6.78	73.73
Croatia	4	1	1	0	0	0.00	25.00
Cyprus	48	28	259	5	8	10.42	58.33
Denmark	22	19	114	0	0	0.00	86.36
Dominica	1	1	2	0	0	0.00	100.00
Egypt	26	23	184	0	0	0.00	88.46
Georgia	3	2	10	1	3	33.33	66.67
Germany	9	7	52	1	1	11.11	77.78
Gibraltar (GB)	16	10	45	1	1	6.25	62.50
Greece	108	37	206	4	10	3.70	34.26
Honduras	2	2	16	1	3	50.00	100.00
Hong Kong, China	169	56	298	3	5	1.78	33.14
India	6	1	5	0	0	0.00	16.67
Iran, Islamic Republic of	4	2	18	0	0	0.00	50.00
Ireland	2	1	8	0	0	0.00	50.00
Isle of Man (GB)	28	13	66	0	0	0.00	46.43
Israel	4	3	17	1	1	25.00	75.00
Italy	60	34	237	8	9	13.33	56.67
Jordan	1	1	20	1	3	100.00	100.00
Korea, Republic of	1	1	8	0	0	0.00	100.00
Kuwait	1	1	1	0	0	0.00	100.00

Table 7- Inspection Data by Flag (Continue)

FLAG	NUMBER OF INSPECTIONS	NUMBER OF INSPECTIONS WITH DEFICIENCIES	NUMBER OF DEFICIENCIES	NUMBER OF INSPECTIONS WITH DETENTIONS	NUMBER OF INDIVIDUAL SHIPS INSPECTED	DETENTION PERCENTAGE	% OF INSPECTIONS WITH DEFICIENCIES
Lebanon	6	5	18	2	2	33.33	83.33
Liberia	474	214	1,210	12	27	2.53	45.15
Libyan Arab Jamahiriya	4	2	3	0	0	0.00	50.00
Lithuania	2	1	3	0	0	0.00	50.00
Luxemburg	6	2	5	0	0	0.00	33.33
Malta	533	243	1,236	8	19	1.50	45.59
Marshall Islands	496	221	1,257	7	13	1.41	44.56
Moldova, Republic of	112	97	840	14	55	12.50	86.61
Mongolia	7	7	76	1	5	14.29	100.00
Montenegro	5	1	14	0	0	0.00	20.00
Netherlands	60	23	148	3	10	5.00	38.33
Norway	40	20	135	0	0	0.00	50.00
Pakistan	1	1	9	0	0	0.00	100.00
Palau	63	52	393	8	25	12.70	82.54
Panama	835	527	4,344	66	206	7.90	63.11
Philippines	15	8	70	0	0	0.00	53.33
Portugal	36	26	203	1	6	2.78	72.22
Qatar	1	1	3	0	0	0.00	100.00
Russian Federation	249	157	667	3	13	1.20	63.05
Saint Kitts and Nevis	23	17	85	1	1	4.35	73.91
Saint Vincent and the Grenadines	40	23	150	3	11	7.50	57.50
Samoa	4	4	49	2	12	50.00	100.00
Saudi Arabia	4	1	1	0	0	0.00	25.00
Seychelles	2	2	4	1	1	50.00	100.00
Sierra Leone	116	100	746	11	40	9.48	86.21
Singapore	148	75	358	1	2	0.68	50.68
Sri Lanka	1	1	9	0	0	0.00	100.00
Switzerland	6	3	20	0	0	0.00	50.00
Syrian Arab Republic	8	5	61	0	0	0.00	62.50
Tanzania, United Republic of	147	131	1,287	23	108	15.65	89.12
Thailand	7	5	36	1	1	14.29	71.43
Togo	137	123	1,091	21	96	15.33	89.78
Tunisia	3	2	6	0	0	0.00	66.67
Turkey	349	234	1,253	2	9	0.57	67.05
Tuvalu	19	10	58	0	0	0.00	52.63
Ukraine	22	22	175	3	26	13.64	100.00
United Kingdom	13	7	36	0	0	0.00	53.85
United States	1	1	7	0	0	0.00	100.00
Vanuatu	67	57	450	10	34	14.93	85.07
TOTAL	5,208	3,103	21,450	278	948	5.34	59.58

Table 8- Inspection Data by Recognized Organizations (Number of Inspections>10)

RECOGNIZED ORGANIZATION	NUMBER OF INSPECTIONS	NUMBER OF INSPECTIONS WITH DEFICIENCIES	NUMBER OF DEFICIENCIES	NUMBER OF RO RELATED DEFICIENCIES	NUMBER OF DETENTIONS	DETENTIONS WITH RO RELATED DETAINABLE DEFICIENCIES
American Bureau of Shipping	554	232	1,192	0	8	0
American Register of Shipping	19	8	45	0	0	0
Bulgarian Register of Shipping	82	72	539	3	9	1
Bureau Veritas	922	465	2,948	3	33	1
China Classification Society	83	25	172	0	1	0
Columbus American Register	16	14	208	7	5	2
Det Norske Veritas	113	44	189	0	0	0
DNV GL AS	1,075	505	3,004	0	25	0
Dromon Bureau of Shipping	191	164	1,343	0	24	0
Germanischer Lloyd	85	39	241	0	3	0
Indian Register of Shipping	28	20	116	0	1	0
Intermaritime Certification Services, ICS Class	40	32	229	0	3	0
International Naval Surveys Bureau	184	154	1,212	4	20	2
International Register of Shipping	38	33	270	1	4	1
Isthmus Bureau of Shipping, S.A.	53	48	515	0	12	0
Korean Register of Shipping	85	39	254	0	4	0
Lloyd's Register	832	407	2,335	0	12	0
Macosnar Corporation	59	50	401	1	5	1
Maritime Bureau of Shipping	19	17	137	3	3	1
Maritime Lloyd (ML)	95	85	942	1	20	1
Mediterranean Shipping Register (MSR)	33	28	172	0	2	0
National Shipping Adjuster Inc.	73	60	473	1	10	1
Nippon Kaiji Kyokai	1,095	558	3,578	0	37	0
Other	212	180	1,826	19	38	5
Overseas Marine Certification Services	19	17	170	0	2	0
Panama Maritime Documentation Services	12	9	90	0	3	0
Panama Shipping Registrar Inc.	15	9	83	0	1	0
Phoenix Register of Shipping	164	135	1,165	2	22	2
Polski Rejestr Statkow (Polish Register of Shipping)	64	37	313	0	3	0
RINA Services S.p.A.	324	165	1,064	1	14	1
Russian Maritime Register of Shipping	505	332	1,706	0	13	0
Shipping Register of Ukraine (SRU)	106	91	712	0	12	0
Turkish Lloyd	164	126	699	0	2	0
Venezuelan Register of Shipping	35	32	305	0	7	0

Note: Number of inspections and detentions are calculated corresponding to each recognized organization (RO) that issued certificate(s) for a ship. In case that ship's certificates were issued more than one ROs, the inspection and detention would be counted to each of them.

Table 9- Inspection Data by Ship Type

TYPE OF SHIP	NUMBER OF INSPECTIONS	INSPECTIONS WITH DEFICIENCIES	NUMBER OF DEFICIENCIES	NUMBER OF INSPECTIONS WITH DETENTIONS	NUMBER OF INDIVIDUAL SHIPS INSPECTED	DETENTION PERCENTAGE	% OF INSPECTIONS WITH DEFICIENCIES
Bulk Carrier	1,850	878	6,158	66	1,510	3.57	47.46
Chemical Tanker	386	181	890	3	314	0.78	46.89
Combination Carrier	9	8	29	0	8	0.00	88.89
Container	175	131	873	6	132	3.43	74.86
Gas Carrier	50	21	70	0	41	0.00	42.00
General Cargo / Multipurpose	1,890	1,408	10,723	164	1,181	8.68	74.50
Heavy Load	2	2	10	0	2	0.00	100.00
High Speed Passenger Craft	3	2	8	0	1	0.00	66.67
Livestock Carrier	38	37	234	2	27	5.26	97.37
MODU and FPSO	4	2	10	0	4	0.00	50.00
NLS Tanker	6	4	21	0	4	0.00	66.67
Offshore Supply	7	5	19	0	7	0.00	71.43
Oil Tanker	619	284	1,195	14	516	2.26	45.88
Other Special Activities	16	7	25	1	14	6.25	43.75
Refrigerated Cargo	10	6	32	1	9	10.00	60.00
Ro-Ro Cargo	97	87	941	20	35	20.62	89.69
Ro-Ro Passenger Ship	22	18	61	0	8	0.00	81.82
Special Purpose Ship	3	1	2	0	3	0.00	33.33
Tugboat	24	18	115	1	19	4.17	75.00
Vehicle Carrier	3	3	34	0	3	0.00	100.00
ALL TYPES OF SHIPS	5,214	3,103	21,450	278	3,824	5.33	59.51

Table 10- Inspection Data by Type of Deficiencies

CATEGORY OF DEFICIENCIES		NUMBER OF DEFICIENCIES	NO. OF DETAINABLE DEFICIENCIES	NO. OF RO RELATED DETAINABLE DEFICIENCIES	% OF TOTAL DEFICIENCIES	% OF TOTAL DETAINABLE DEFICIENCIES	% OF TOTAL RO RELATED DETAINABLE DEFICIENCIES
Certificates and Documents	Crew Certificates	326	37	0	1.52	3.90	0.00
	Documents	1,454	15	0	6.78	1.58	0.00
	Ship Certificates	590	36	2	2.75	3.80	4.35
SOLAS	Structural Conditions	1,422	94	11	6.63	9.92	23.91
	Emergency Systems	1,279	133	5	5.96	14.03	10.87
	Alarm Signals	0	0	0	0.00	0.00	0.00
	Radio Communications	1,045	49	1	4.87	5.17	2.17
	Cargo Operations Including Equipment	107	6	0	0.50	0.63	0.00
	Fire Safety	1,912	137	12	8.91	14.45	26.09
	Alarms	89	8	2	0.41	0.84	4.35
	Safety of Navigation	3,394	113	5	15.82	11.92	10.87
	Dangerous Goods	71	3	0	0.33	0.32	0.00
	Life-saving Appliances	3,199	136	2	14.91	14.35	4.35
	Propulsion and Auxiliary Machinery	1,357	31	1	6.33	3.27	2.17
Pollution Prevention	Anti Fouling	1	0	0	0.00	0.00	0.00
	MARPOL Annex I	256	22	1	1.19	2.32	2.17
	Annex II	4	0	0	0.02	0.00	0.00
	Annex III	13	0	0	0.06	0.00	0.00
	Annex IV	55	3	0	0.26	0.32	0.00
	Annex V	312	0	0	1.45	0.00	0.00
	Annex VI	83	0	0	0.39	0.00	0.00
	Anti Fouling	1	0	0	0.00	0.00	0.00
	Operational Deficiencies	0	0	0	0.00	0.00	0.00
ILO/MLC	Living Conditions	181	0	0	0.84	0.00	0.00
	Working Conditions	1,005	17	0	4.69	1.79	0.00
	Minimum Requirements for Seafarers	16	0	0	0.07	0.00	0.00
	Conditions of Employment	29	11	0	0.14	1.16	0.00
	Accommodation, Recreational	336	7	0	1.57	0.74	0.00
	Health Protection, Medical Care, Social Security	2,133	25	0	9.94	2.64	0.00
ISM		544	65	4	2.54	6.86	8.70
Other		176	0	0	0.82	0.00	0.00
TOTAL		21,450	948	46			

Statistical Data 2016-2018

Summary

	2016	2017	2018
Number of Inspections	5,066	5,112	5,214
Number of Inspections with Deficiencies	2,845	3,018	3,103
Number of Deficiencies Observed	18,266	21,006	21,450
Number of Detentions	229	283	278
% of Inspections with Deficiencies	56.16	59.04	59.51
Detention Percentage	4.52	5.54	5.33
Average Number of Deficiencies per Inspection	3.61	4.11	4.11

Inspection Data by Authority 2016-2018

MARITIME AUTHORITY	NO. OF INDIVIDUAL SHIP VISIT			NO. OF INDIVIDUAL SHIP INSPECTED			NUMBER OF INSPECTIONS			NO. OF INSPECTIONS WITH DEFICIENCIES			NUMBER OF DETENTIONS		
	2016	2017	2018	2016	2017	2018	2016	2017	2018	2016	2017	2018	2016	2017	2018
BULGARIA	1,346	1,263	1,321	356	279	314	351	288	331	228	192	228	14	9	13
GEORGIA	674	577	533	320	270	250	474	283	272	218	207	208	14	23	24
ROMANIA	1,780	1,679	1,724	565	460	496	502	508	534	363	402	394	59	57	29
RUSSIAN FEDERATION ⁽¹⁾	1,938	2,200	2,196	1,395	1,554	1,534	1,809	1,866	1,879	1,255	1,306	1,386	111	102	166
TURKEY ⁽¹⁾	1,041	1,212	1,225	341	348	356	374	401	403	226	263	238	21	19	18
UKRAINE	1,378	2,140	2,234	1,553	1,429	1,544	1,556	1,766	1,795	555	648	649	10	73	28

MARITIME AUTHORITY	% OF INSPECTIONS WITH DEFICIENCIES			DETENTION PERCENTAGE			DETENTION RATE ⁽²⁾			INSPECTION RATE ⁽³⁾		
	2016	2017	2018	2016	2017	2018	2016	2017	2018	2016	2017	2018
BULGARIA	64.96	66.67	68.88	3.99	3.13	3.93	4.09	3.23	4.14	25.41	22.09	23.77
GEORGIA	45.99	73.14	76.47	2.95	8.13	8.82	4.15	8.52	9.60	50.00	46.79	46.90
ROMANIA	72.31	79.13	73.78	11.75	11.22	5.43	12.06	11.96	5.85	27.02	27.40	28.77
RUSSIAN FEDERATION ⁽¹⁾	69.38	69.99	73.76	6.14	5.47	8.83	7.00	6.24	9.32	78.84	70.64	69.85
TURKEY ⁽¹⁾	60.43	65.59	59.06	5.61	4.74	4.47	6.17	5.17	4.49	31.12	28.71	29.06
UKRAINE	35.67	36.69	36.16	0.64	4.13	1.56	0.65	5.11	1.81	68.29	66.78	69.11

⁽¹⁾ Data only for the Black Sea Ports

⁽²⁾ Individual ships detained as per cent of individual ships inspected

⁽³⁾ Individual ships inspected as per cent of number of individual ships visited

Inspection by Ship Types (in the order of 2018 top 10 inspections)

SHIP TYPE	2016	2016 SHARE	2017	2017 SHARE	2018	2018 SHARE	2016-2018 SHARE
General Cargo / Multipurpose	1,910	38.2%	1,915	37.8%	1,890	36.3%	37.3%
Bulk Carrier	1,737	34.8%	1,779	35.1%	1,850	35.5%	34.4%
Oil Tanker	666	13.3%	644	12.7%	619	11.87%	12.4%
Chemical Tanker	347	6.9%	352	6.9%	386	7.40%	7.0%
Container	157	3.1%	145	2.9%	175	3.36%	3.0%
Ro-Ro Cargo	56	1.1%	54	1.1%	97	1.86%	1.3%
Gas Carrier	53	1.1%	86	1.7%	63	1.21%	1.4%
Livestock Carrier	36	0.7%	38	0.8%	50	0.96%	0.8%
Tugboat	25	0.5%	19	0.4%	38	0.73%	0.4%
Ro-Ro Passenger Ship	13	0.3%	18	0.4%	24	0.5%	0.5%
Other Types of Ships	66	1.3%	62	1.2%	22	0.4%	1.4%
TOTALS	5,066		5,112		5,292		

Inspection by Ship Flag (in the order of 2018 top 10 inspections)

SHIP FLAG	2016	2016 SHARE	2017	2017 SHARE	2018	2018 SHARE	2016-2018 SHARE
Panama	697	13.8%	758	14.8%	835	16.0%	14.9%
Malta	620	12.2%	563	11.0%	533	10.2%	11.1%
Marshall Islands	442	8.7%	446	8.7%	496	9.5%	9.0%
Liberia	383	7.6%	428	8.4%	474	9.1%	8.3%
Turkey	427	8.4%	362	7.1%	349	6.7%	7.4%
Russian Federation	255	5.0%	224	4.4%	249	4.8%	4.7%
Hong Kong, China	81	1.6%	162	3.2%	147	2.8%	2.5%
Singapore	157	3.1%	159	3.1%	169	3.2%	3.1%
Tanzania, United Republic of	106	2.1%	147	2.9%	147	2.8%	2.6%
Togo	143	2.8%	140	2.7%	148	2.8%	2.8%
Others	1,743	34.4%	1,723	33.7%	1,677	32.1%	4.3%
TOTALS	5,066		5,112		5,224		

Detentions by Ship Types (in the order of 2018 top 10 inspections)

SHIP TYPE	2016	2016 SHARE	2017	2017 SHARE	2018	2018 SHARE	2016-2018 SHARE
General Cargo / Multipurpose	146	63.8%	179	63.3%	146	52.5%	60.8%
Bulk Carrier	53	23.1%	59	20.8%	53	19.1%	22.3%
Oil Tanker	5	2.2%	6	2.1%	7	2.5%	2.3%
Chemical Tanker	6	2.6%	8	2.8%	6	2.2%	2.2%
Container	2	0.9%	4	1.4%	5	1.8%	1.1%
Ro-Ro Cargo	0	0.0%	3	1.1%	4	1.4%	0.7%
Gas Carrier	7	3.1%	12	4.2%	3	1.1%	4.2%
Livestock Carrier	4	1.7%	5	1.8%	2	0.7%	2.3%
Tugboat	3	1.3%	2	0.7%	1	0.4%	0.8%
Ro-Ro Passenger Ship	0	0.0%	2	0.7%	1	0.4%	1.6%
Other Types of Ship	2	0.9%	3	1.1%	1	0.4%	2.6%
TOTALS	229		283		278		

Detentions by Ship Flag (more than 1 detentions in 2018)

SHIP FLAG	2016	2016 SHARE	2017	2017 SHARE	2018	2018 SHARE	2016-2018 SHARE
Antigua and Barbuda	3	1.3%	4	1.4%	8	2.9%	1.9%
Bahamas	0	0.0%	1	1.0%	2	0.7%	0.4%
Belize	4	1.7%	13	4.6%	7	2.5%	3.0%
Comoros	10	4.4%	17	6.0%	22	7.9%	6.2%
Cook Islands	8	3.5%	16	5.7%	8	2.9%	4.1%
Cyprus	1	0.4%	2	0.7%	5	1.8%	1.0%
Greece	0	0.0%	1	0.4%	4	1.4%	0.6%
Hong Kong, China	0	0.0%	2	0.7%	3	1.1%	0.6%
Italy	0	0.0%	1	0.4%	8	2.9%	1.1%
Lebanon	1	0.4%	0	0.0%	2	0.7%	0.4%
Liberia	7	3.1%	8	2.8%	12	4.3%	3.4%
Malta	7	3.1%	9	3.2%	8	2.9%	3.0%
Marshall Islands	7	3.1%	9	3.2%	7	2.5%	2.9%
Moldova, Republic of	21	9.2%	15	5.3%	14	5.0%	6.3%
Netherlands	0	0.0%	2	0.7%	3	1.1%	0.6%
Palau	5	2.2%	8	2.8%	8	2.9%	2.7%
Panama	34	14.8%	58	20.5%	66	23.7%	20.0%
Russian Federation	12	5.2%	13	4.6%	3	1.1%	3.5%
Saint Vincent and the Grenadines	2	0.9%	3	1.1%	3	1.1%	1.0%
Samoa	0	0.0%	0	0.0%	2	0.7%	0.3%
Sierra Leone	9	3.9%	21	7.4%	11	4.0%	5.2%
Tanzania, United Republic of	12	5.2%	20	7.1%	23	8.3%	7.0%
Togo	14	6.1%	23	8.1%	21	7.6%	7.3%
Turkey	39	17.0%	11	3.9%	2	0.7%	6.6%
Ukraine	3	1.3%	4	1.4%	3	1.1%	1.3%
Vanuatu	2	0.9%	2	0.7%	10	3.6%	1.8%
Other	28	12.2%	20	7.1%	13	4.7%	7.7%
TOTALS	229		283		278		

Major Category of Deficiencies 2016-2018

CATEGORY OF DEFICIENCIES		2016		2017		2018	
		Number	%	Number	%	Number	%
Certificates and Documents	Crew Certificates	202	1.11	421	2.00	326	1.52
	Documents	1,171	6.41	1,292	6.15	1,454	6.78
	Ship Certificates	579	3.17	652	3.10	590	2.75
SOLAS	Structural Conditions	1,173	6.42	1,504	7.16	1,422	6.63
	Emergency Systems	960	5.26	1,145	5.45	1,279	5.96
	Alarm Signals	0	0.00	0	0.00	0	0.00
	Radio Communications	855	4.68	846	4.03	1,045	4.87
	Cargo Operations Including Equipment	141	0.77	82	0.39	107	0.50
	Fire Safety	1,846	10.11	1,910	9.09	1,912	8.91
	Alarms	72	0.39	70	0.33	89	0.41
	Safety of Navigation	3,112	17.04	3,446	16.40	3,394	15.82
	Dangerous Goods	42	0.23	52	0.25	71	0.33
	Life-saving Appliances	2,657	14.55	2,800	13.33	3,199	14.91
	Propulsion and Auxiliary Machinery	1,093	5.98	1,436	6.84	1,357	6.33
	Ballast Water (BWM)			2	0.01	61	0.22
Pollution Prevention	Anti Fouling	1	0.01	2	0.01	1	0.00
	MARPOL Annex I	293	1.60	359	1.71	256	1.19
	Annex II	11	0.06	1	0.00	4	0.02
	Annex III	6	0.03	8	0.04	13	0.06
	Annex IV	52	0.28	67	0.32	55	0.25
	Annex V	178	0.97	279	1.33	312	1.45
	Annex VI	19	0.10	22	0.10	83	0.39
	Operational Deficiencies	0	0.00	0	0.00	0	0.00
ILO/MLC	Living Conditions	261	1.43	181	0.86	181	0.84
	Working Conditions	1,132	6.20	1,150	5.47	1,005	4.69
	Minimum Requirements for Seafarers	6	0.03	18	0.08	16	0.07
	Conditions of Employment	30	0.16	22	0.10	29	0.13
	Accommodation, Recreational	198	1.08	381	1.81	336	1.57
	Health Protection, Medical Care, Social Security	1,572	8.61	2,176	10.36	2,133	9.94
ISM		443	2.43	535	2.55	544	2.54
Other		161	0.88	147	0.70	172	0.80
TOTAL		18,094		21,006		21,450	

Major Deficiencies by Category (in the order 2018 top 10)

DEFICIENCIES BY CATEGORY	2016	2016 SHARE	2017	2017 SHARE	2018	2018 SHARE	2016-2018 SHARE
Safety of Navigation	3,112	17,0%	3,446	16,4%	3,394	15,82%	16,4%
Life Saving Appliances	2,657	14,5%	2,800	13,3%	3,199	14,91%	14,3%
Health Protection, Medical Care, Social Security	1,572	8,6%	1,910	9,1%	2,133	8,46%	8,7%
Fire Safety	1,846	10,1%	2,176	10,4%	1,912	8,91%	9,8%
Certificate & Documentation/Documents	1,171	6,4%	1,292	6,2%	1,780	8,30%	7,0%
Structural Conditions	1,173	6,4%	1,504	7,2%	1,748	8,15%	7,3%
Propulsion and Auxiliary Machinery	1,093	6,0%	1,436	6,8%	1,357	6,33%	6,4%
Emergency Systems	960	5,3%	1,145	5,5%	1,279	5,96%	5,6%
Radio Communications	855	4,7%	846	4,0%	1,045	4,87%	4,5%
Working Conditions	1,132	6,2%	1,150	5,5%	1,005	4,69%	5,4%
Others	2,695	14,8%	3,301	15,7%	2,598	12,11%	14,2%
TOTALS	18,266		21,006		21,450		

Top 5 Deficiencies 2016-2018

2016	2017	2018
Lifeboats 627 (3.43%)	Lifeboats 689 (3.28%)	Lights, Shapes, Sound-Signals 874 (4.07%)
Lights, Shapes, Sound-Signals 600 (3.28%)	Lights, Shapes, Sound-Signals 681 (3.34%)	Lifeboats 782 (3.65%)
Nautical Publications 579 (3.17%)	Nautical Publications 580 (2.76%)	Emergency, Lighting, Batteries and Switches 644 (3.00%)
Lifebuoys Incl. Provision and Disposition 470 (2.57%)	Emergency, Lighting, Batteries and Switches 494 (2.35%)	Auxiliary Engine 542 (2.53%)
Emergency, Lighting, Batteries and Switches 450 (2.46%)	Access / Structural Features (Ship) 473 (2.25%)	Lifebuoys Incl. Provision and Disposition 477 (2.22%)

Major Detainable Deficiencies by Category 2016-2018 (in the order 2018 top 10)

DETAINABLE DEFICIENCIES BY CATEGORY	2016	2016 SHARE	2017	2017 SHARE	2018	2018 SHARE	2016-2018 SHARE
Fire Safety	99	12.0%	120	12.5%	137	14.5%	13.0%
Life Saving Appliances	105	12.8%	125	13.0%	136	14.3%	13.4%
Emergency Systems	110	13.4%	132	13.7%	133	14.0%	13.7%
Safety of Navigation	140	17.0%	135	14.0%	113	11.9%	14.2%
Structural Conditions	67	8.2%	80	8.3%	94	9.9%	8.8%
ISM	68	8.3%	73	7.6%	65	6.9%	7.5%
Radio Communications	36	4.4%	30	3.1%	49	5.2%	4.2%
Crew Certificates	32	3.9%	48	5.0%	37	3.9%	4.3%
Certificate & Documentation/Ship Certificates	37	4.5%	31	3.2%	36	3.8%	3.8%
Propulsion and Auxiliary Machinery	31	3.8%	35	3.6%	31	3.3%	3.6%
Others	97	11.8%	153	15.9%	117	12.3%	13.4%
TOTALS	822		962		948		

Top 5 Detainable Deficiencies 2016-2018

2016	2017	2018
Nautical Publications 46 (5.60%)	Other (ISM) 50 (5.20%)	Lifeboats 62 (6,54%)
Other (ISM) 41 (4.99%)	Lifeboats 44 (4.57%)	Emergency, Lighting, Batteries and Switches 55 (5,80%)
Lifeboats 34 (4.14%)	Cleanliness of Engine Room 35 (3.64%)	Fire Detection and Alarm System 44 (4,64%)
Charts 32 (3.89%)	Emergency, Lighting, Batteries and Switches 34 (3.53%)	Lights, Shapes, Sound-Signals 34 (3,59%)
Emergency Fire Pump and Its Pipes 29 (3.53%)	Lights, Shapes and Sound-Signals 32 (3.3%)	Emergency Fire Pump and Its Pipes 23 (2,43%)

Major RO Related Detainable Deficiencies by Category 2016-2018 (in the order 2018 top 5)

RO RELATED DETAINABLE DEFICIENCIES BY CATEGORY	2016	2016 SHARE	2017	2017 SHARE	2018	2018 SHARE	2016-2018 SHARE
Fire Safety	3	6.4%	10	24.4%	12	26.1%	18.7%
Structural Conditions	13	27.7%	8	19.5%	11	23.9%	23.9%
Emergency Systems	1	2.1%	2	4.9%	5	10.9%	6.0%
Safety of Navigation	2	4.3%	2	4.9%	5	10.9%	6.7%
ISM	4	8.5%	5	12.2%	4	8.7%	9.7%
All Other Deficiencies	24	21.3%	14	34.1%	9	19.6%	35.1%
TOTALS	47		41		46		

RO Related Detainable Deficiencies 2016-2018

2016	2017	2018
Fire Doors / Openings in Fire-Resisting Divisions 4 (9.76%)	Other (ISM) 6 (12.24%)	Fire Pumps and Its Pipes 3 (1.08%)
Lifeboats 4 (9.76%)	Covers (Hatchway-, Portable-, Tarpaulins, etc.) 4 (8.16%)	Fire-Dampers 3 (1.08%)
Documentation-ISM 4 (9.76%)	Emergency, Lighting, Batteries and Switches 4 (8.16%)	Closing Devices / Watertight Doors 2 (0,72%)
Doors 3 (7.32%)	Lifeboats 4 (8.16%)	Ballast, Fuel and Other Tanks 2 (0,72%)
Ventilators, Air Pipes, Casings 3 (7.32%)	Rescue Boats 4 (8.16%)	Openings to Cargo Area, Doors, Scuttles 2 (0,72%)
		Emergency, Lighting, Batteries and Switches 2 (0,72%)
		Emergency Source of Power - Emergency Generator 2 (0,72%)
		Fire Detection and Alarm System 2 (0,72%)
		Lights, Shapes, Sound-Signals 2 (0,72%)
		Lifeboats 2 (0,72%)

Top 5 MLC Deficiencies 2016-2018

2016	2017	2018
Lighting (Working Spaces) 358 (17.61%)	Access / Structural Features (Ship) 473 (16.24%)	Lighting (Working Spaces) 417 (15,25%)
Access / Structural Features (Ship) 334 (16.43%)	Lighting (Working Spaces) 432 (14.84%)	Access / Structural Features (Ship) 362 (13,24%)
Ropes and Wires 275 (13.53%)	Ropes and Wires 283 (9.72%)	Ropes and Wires 287 (10,50%)
Records of Rest 141 (6.94%)	Electrical 212 (7.28%)	Electrical 260 (9,51%)
Electrical 130 (6.39%)	Steam Pipes, Pressure Pipes, Wires (Insulation) 133 (4.57%)	Steam Pipes, Pressure Pipes, Wires (Insulation) 149 (5,45%)

Top 5 MLC Detainable Deficiencies 2016-2018

2016	2017	2018
Ropes and Wires 6 (14.29%)	Ropes and Wires 6 (10.71%)	Wages 8 (15,69%)
Manning Specified by the Minimum Safe Manning Doc 5 (11.90%)	Cleanliness of Engine Room 6 (10.71%)	Cleanliness of Engine Room 6 (11,76%)
Seafarers' Employment Agreement (SEA) 4 (9.52%)	Winches & Capstans 5 (8.93%)	Seafarers' Employment Agreement (SEA) 4 (7,84%)
Wages 3 (7.14%)	Anchoring Devices 5 (8.93%)	Steam Pipes, Pressure Pipes, Wires (Insulation) 4 (7,84%)
Anchoring Devices 3 (7.14%)	Wages 5 (8.93%)	Anchoring Devices 3 (5,88%)

Inspection Detention Deficiency Data by Ship Flag 2016-2018

SHIP FLAG	NUMBER OF INSPECTIONS	NUMBER OF DEFICIENCIES	NUMBER OF DETENTIONS	NUMBER OF DETAINABLE DEFICIENCIES	NUMBER OF INSPECTIONS WITH DEFICIENCIES
Algeria	14	66	1	4	5
Antigua and Barbuda	276	1,106	15	32	157
Argentina	1	0	0	0	0
Azerbaijan	37	125	1	4	17
Bahamas	320	755	3	3	130
Bahrain	1	4	0	0	1
Bangladesh	6	19	0	0	3
Barbados	40	190	0	0	30
Belgium	9	12	0	0	3
Belize	334	1,787	24	86	250
Bermuda (GB)	9	29	0	0	6
Bolivia	3	37	0	0	2
Bulgaria	43	182	2	7	31
Cambodia	56	334	7	42	46
Cameroon	1	3	0	0	1
Canada	2	4	0	0	1
Cayman Islands (GB)	28	51	0	0	9
Chile	2	5	0	0	2
China	44	65	0	0	14
Comoros	303	2,378	49	197	247
Congo	32	272	4	13	27
Congo, the Democratic Republic of the	37	261	4	19	29
Cook Islands	378	1,935	32	110	280
Croatia	18	21	0	0	5
Cyprus	159	495	6	10	68
Denmark	70	293	2	3	58
Dominica	1	2	0	0	1
Egypt	61	391	1	2	49
Ethiopia	9	20	0	0	3
Faroe Islands	3	2	0	0	1
France	6	14	0	0	3
Georgia	7	29	2	8	5
Germany	11	66	1	1	9
Gibraltar (GB)	51	132	2	3	27
Greece	372	451	5	11	94
Honduras	2	16	1	3	2
Hong Kong, China	485	940	5	9	180
India	21	42	0	0	9
Iran, Islamic Republic of	31	142	2	8	11
Ireland	4	8	0	0	1
Isle of Man (GB)	86	204	2	2	36
Israel	10	48	1	1	7
Italy	188	404	9	12	83
Japan	3	0	0	0	0
Jordan	1	20	1	3	1
Kazakhstan	4	19	1	3	2
Korea, Republic of	4	11	0	0	2
Kuwait	2	1	0	0	1

Inspection Detention Deficiency Data by Ship Flag 2016-2018 (Continue)

SHIP FLAG	NUMBER OF INSPECTIONS	NUMBER OF DEFICIENCIES	NUMBER OF DETENTIONS	NUMBER OF DETAINABLE DEFICIENCIES	NUMBER OF INSPECTIONS WITH DEFICIENCIES
Latvia	1	3	0	0	1
Lebanon	26	111	3	6	20
Liberia	1,285	3,325	27	56	594
Libyan Arab Jamahiriya	18	25	0	0	8
Lithuania	6	6	0	0	2
Luxembourg	8	12	0	0	4
Malaysia	2	0	0	0	0
Malta	1,717	4,025	24	54	800
Marshall Islands	1,384	3,312	23	41	595
Micronesia, Federated States of	6	22	1	4	5
Moldova, Republic of	358	2,643	50	256	304
Mongolia	37	311	5	24	33
Montenegro	12	22	0	0	3
Netherlands	192	382	5	13	72
Norway	89	258	0	0	40
Pakistan	2	9	0	0	1
Palau	188	1,243	21	84	143
Panama	2,290	10,971	158	534	1,421
Philippines	50	174	2	5	26
Poland	1	8	0	0	1
Portugal	90	367	2	8	59
Qatar	3	5	0	0	2
Romania	1	7	0	0	1
Russian Federation	728	2,442	28	102	476
Saint Kitts and Nevis	108	467	6	13	79
Saint Vincent and the Grenadines	125	558	8	18	82
Samoa	4	49	2	12	4
Saudi Arabia	8	17	0	0	3
Seychelles	4	17	1	1	4
Sierra Leone	343	2,301	41	153	287
Singapore	431	1,128	5	7	212
South Africa	1	0	0	0	0
Sri Lanka	3	17	0	0	2
Switzerland	26	49	0	0	10
Syrian Arab Republic	14	102	0	0	10
Tanzania, United Republic of	391	3,402	55	268	346
Thailand	17	60	1	1	8
Togo	390	3,186	58	244	346
Tunisia	9	56	1	4	7
Turkey	1,138	4,537	52	121	771
Tuvalu	47	187	3	6	29
Ukraine	68	522	10	56	64
United Arab Emirates	1	0	0	0	0
United Kingdom	51	150	1	1	27
United States	3	16	0	0	3
Vanuatu	133	829	14	44	112
TOTAL	15.394	60.724	790	2.732	8.966

RO Inspection Deficiency and Detention Data 2016-2018

RECOGNIZED ORGANIZATION	NUMBER OF INSPECTIONS	NUMBER OF RO RELATED DETAINABLE DEFICIENCIES	NUMBER OF RO RELATED DETENTIONS	NUMBER OF DEFICIENCIES	NUMBER OF DETENTIONS	NUMBER OF DETAINABLE DEFICIENCIES	NUMBER OF INSPECTIONS WITH DEFICIENCIES
American Bureau of Shipping	1,622	1	1	3,263	21	38	667
American Register of Shipping	48	0	0	104	1	8	20
ASIA Classification Society	11	0	0	77	1	2	7
Bulgarian Register of Shipping	232	5	3	1,484	25	112	193
Bureau Veritas	2,565	5	3	7,836	77	169	1,304
C.T.M. Inspection and Classification Company, S. de R.L.	2	0	0	7	0	0	1
Caspian Register of Shipping	2	0	0	8	0	0	1
China Classification Society	271	0	0	425	1	1	76
Columbus American Register	43	7	2	447	9	60	40
Cosmos Marine Bureau Inc.	30	2	1	279	8	40	26
CR Classification Society (CCRS)	6	0	0	65	1	2	6
Croatian Register of Shipping	28	0	0	62	1	1	11
Cyprus Bureau of Shipping	2	0	0	2	0	0	1
Det Norske Veritas	831	0	0	1,313	3	4	287
DNV GL AS	2,818	0	0	6,882	44	92	1,281
Dromon Bureau of Shipping	552	9	2	3,740	65	239	467
Ferriby Marine	11	0	0	37	0	0	5
Germanischer Lloyd	589	0	0	1,444	10	19	281
Global Marine Bureau Inc.	16	0	0	90	1	6	12
Global Shipping Bureau Inc	2	0	0	23	0	0	2
Guardian Bureau of Shipping (GBS)	17	13	2	166	2	24	15
Hellenic Register of Shipping	13	0	0	60	1	1	8
Honduras International Surveying and Inspection Bureau	1	0	0	3	0	0	1
Indian Register of Shipping	47	0	0	167	2	5	32
Inspeccion y Clasificacion Maritima (INCLAMAR)	2	0	0	27	0	0	2
Intermaritime Certification Services, ICS Class	117	0	0	658	7	16	87
International Maritime Register	8	0	0	46	0	0	7
International Naval Surveys Bureau	492	7	5	3,370	54	191	405
International Register of Shipping	181	10	3	1,352	23	110	150
International Ship Classification	22	0	0	96	2	4	12
Iranian Classification Society	9	0	0	12	0	0	2
Isthmus Bureau of Shipping, S.A.	131	7	1	1,134	21	56	113
Korea Classification Society	8	0	0	7	0	0	2
Korean Register of Shipping	248	0	0	702	7	14	114
Libyan Surveyor Mr. Sif Ennasar Abdulhamid Giahmi	2	0	0	10	0	0	2

RO Inspection Deficiency and Detention Data 2016-2018 (Continue)

RECOGNIZED ORGANIZATION	NUMBER OF INSPECTIONS	NUMBER OF RO RELATED DETAINABLE DEFICIENCIES	NUMBER OF RO RELATED DETENTIONS	NUMBER OF DEFICIENCIES	NUMBER OF DETENTIONS	NUMBER OF DETAINABLE DEFICIENCIES	NUMBER OF INSPECTIONS WITH DEFICIENCIES
Lloyd's Register	2,568	1	1	6,765	36	82	1,216
Macosnar Corporation	158	2	2	1,096	17	65	131
Maritime Bureau of Shipping	52	3	1	406	6	27	49
Maritime Lloyd (ML)	242	11	4	2,217	39	135	222
Mediterranean Shipping Register (MSR)	79	5	1	444	6	24	67
National Cargo Bureau Inc.	1	0	0	0	0	0	0
National Shipping Adjuster Inc.	188	5	2	1,297	26	76	147
New United International Marine Services Ltd.	5	0	0	5	0	0	1
Nippon Kaiji Kyokai	3,309	5	3	11,080	134	327	1,732
No class	5	0	0	18	0	0	3
Other	440	41	11	3,711	66	310	374
Overseas Marine Certification Services	51	0	0	412	5	24	42
Panama Bureau of Shipping	3	0	0	14	1	2	2
Panama Marine Survey and Certification Services Inc.	23	0	0	132	3	11	18
Panama Maritime Documentation Services	38	0	0	314	8	26	28
Panama Maritime Surveyor Bureau Inc.	3	0	0	3	0	0	1
Panama Register Corporation	34	0	0	170	2	6	22
Panama Shipping Registrar Inc.	44	4	1	340	6	29	35
Phoenix Register of Shipping	389	9	4	2,501	48	182	306
Polski Rejestr Statkow (Polish Register of Shipping)	163	2	2	829	11	34	102
R.J. Del Pan	1	0	0	0	0	0	0
RINA Services S.p.A.	846	1	1	2,529	29	64	428
Russian Maritime Register of Shipping	1,608	7	3	5,867	64	200	1,022
Russian River Register	2	0	0	6	0	0	1
Ship Classification Of Malaysia	6	0	0	45	1	1	4
Shipping Register of Ukraine (SRU)	409	10	4	2,591	46	227	328
Turkish Lloyd	547	0	0	2,496	30	79	412
Universal Maritime Bureau Ltd	1	0	0	4	0	0	1
Universal Shipping Bureau Inc.	2	0	0	14	1	3	1
Venezuelan Register of Shipping	172	4	2	1,533	35	149	152
Vietnam Register	1	0	0	6	0	0	1
TOTAL	22,369	176	65	82,243	1,007	3,297	12,488

Note: Number of inspections and detentions are calculated corresponding to each recognized organization (RO) that issued certificate(s) for a ship. In case that ship's certificates were issued more than one ROs, the inspection and detention would be counted to each of them.



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