



Memo No. TDM002-2022

To: Shipowners, ISM Operators and Deputy Registrars

Re: Tokyo MOU Situation and lack of proper implementation of the Merchant Marine Notice MMN-19-006r2 Port State Control Analysis and Self Inspection Program

Date: 9 November 2022

The purpose of this Notice is to request that all Shipowners/ISM Operators make an extra effort to properly implement our self-inspection program in accordance with our [MMN-19-006r2](#) onboard through the Master with the intention to reduce the number of detentions within the Tokyo MOU Area.

BACKGROUND

The [Merchant Marine Notice 19-0006r2](#) was launched on 23 December 2019 and revised on 19 January 2021 and 22 March 2022 with the aim to minimize the number of detentions incurred by Belize registered ships in all MOU's.

The above-mentioned *Notice* provides key information with the intention to be used as a tool to prevent deficiencies and/or detentions.

The [MMN-19-006r2](#) includes a Self-Inspection Program that requires the submission of Form [TDL-018r2 Annex 1 – Self-Inspection Checklist](#) on a monthly basis along with some supporting documents (i.e., Photo Report, Crew List, SEA, etc.) confirming that the vessel was self-inspected by the Master and the result of this self-inspection is confirmed by the Designated Person Ashore (DPA).

CURRENT SITUATION

All our efforts made since the launching of the [MMN-19-006r2](#) were giving the desired result except for the current year only in the Tokyo MOU as our Detention Ratio increased from 7.94% in 2021 to 12.12% in the current year. At this point, **Belize is in the path to lose position within the Grey List** in the next Annual Tokyo MOU Report if this extra effort from your side is not taken now.

As you may notice, this is the opposite direction that as responsible Flag State we would want to go because rather than to be closer to or to achieve the “white list,” we are heading down to the “black list.” This trend will only provide negative results not only to our



Administration, but to your vessel's as well as they will be subject to more often and more detailed inspections.

It is important to note that we cannot absorb more detentions if we want to stop this trend and that is the reason, we kindly request an extra effort from your side in maintaining your vessel(s) in good standing and avoid any possible detention.

NEXT STEPS

With the intention to secure the Grey List and to stop losing positions within this list, the Technical Department of the International Merchant Marine Registry of Belize (IMMARBE) requires that ALL vessel's calling Tokyo MOU ports must comply with the following:

1. Verify the proper implementation of the Safety Management System (SMS) onboard with special attention in **training and maintenance**.
2. Pay special attention when your vessel is schedule to call any **Russian Ports**. Detentions in Russian Ports specifically in Nakhodka, Russia is the 52.6% of the entire detentions of Belize Flagged Vessels within the Tokyo MOU area in the last two months.
3. **To NOT call the port of Nakhodka, Russia** until further notice as the activity of this port is having a negative impact to the status of our Administration within the Tokyo MOU. With immediate effect, any vessel arriving to this port will be subjected to disciplinary action (fine and/or deregistration).
4. To instruct your Master to fully implement **Form TDL-018r2 Annex 1 –Self-Inspection Checklist** as a tool for an early identification of deficiencies with subsequent rectification of them with the intention to have the vessel within the standards prior to any PSC Inspection is performed onboard.
5. Failure to properly implement Form **TDL-018r2 Annex 1 – Self-Inspection Checklist**, our Administration will apply without doubt **disciplinary measure** as stated in the Warning Notice issued on 24 June 2021 which is in accordance with our *Statutory Instrument No. 56 of 1999, Registration of Merchant Ships Disciplinary Regulations 1999*. This Warning Notice is attached to this Memo.

This Notice is with immediate effect; therefore, we expect that the next submission of Form **TDL-018r2 Annex 1 – Self-Inspection Checklist** should be in accordance with these requirements.



We anticipate your cooperation and assistance in this regard and look forward to receiving confirmation of this email.

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

