

## **VOLUNTARY IMO MEMBER STATE AUDIT SCHEME**

### **AUDIT OF TURKEY 30 September to 7 October 2013**

#### **FINAL REPORT**

## **1 Executive Summary**

1.1 The audit of Turkey was undertaken between 30 September and 7 October 2013 by three auditors drawn from Germany, Denmark and the Maldives. The audit team was furthermore supported by an observer auditor from Azerbaijan. The scope of the audit included the flag port and coastal State obligations of Turkey in relation to the mandatory IMO instruments to which it is a party. Visits were made by the auditors to responsible entities within the Turkish administration as per the attached list (appendix 1). The audit was conducted through presentations, interviews and the examination of documents.

1.2 The auditors concluded from the information available to them that Turkey substantially meets its obligations in respect of the mandatory IMO instruments to which it is a Party and also the Code for the implementation of mandatory IMO instruments, 2011 resolution A.1054(27). The audit identified a number of areas of good practice which were innovative and of considerable assistance to the maritime community and also identified areas where improvement was possible. The latter however were relatively minor in relation to the overall efficiency of the administration.

1.3 The following report provides detail of the findings and the evidence on which they are based is to be found in the appendices to the report.

## **2 Introduction**

2.1 The Voluntary IMO Member State Audit Scheme creates a basis to assess the degree a Member State conforms with its obligations set out in the various IMO instruments, to which it is a party. In addition, the Code stipulates a number of principles a Member State should adhere to, in order for its maritime administration to carry out its responsibilities regarding maritime safety and protection of maritime environment and be capable of improving its performance.

2.2 A Memorandum of Cooperation was signed between Turkey and IMO detailing the mandatory IMO instruments which would to be verified during the audit in accordance with the principles of the Code for the implementation of mandatory IMO instruments A.1054(27), hereinafter referred to as "the Code".

2.3 This report has been prepared in accordance with resolution A.974(24) on Framework and Procedures for the Voluntary IMO Member State Audit Scheme.

## **3 Background**

3.1 Following the adoption of the Framework and Procedures for the Voluntary IMO Member State Audit Scheme (resolution A.974(24)) by the twenty-fourth regular session of the Assembly, a number of Member States volunteered for audit under the Scheme.

The audit of Turkey was undertaken using the principles established under resolution A.974(24) and the Code. This report sets out the findings of this audit in the format adopted under section 7.2 of the Procedures for the Scheme.

#### **4 Members of the Audit Team**

Mr. Jens-Uwe Schröder-Hinrichs (Audit Team Leader)	Germany
Mr. Hemming Hindborg (Auditor)	Denmark
Mr. Ibrahim Yasir (Auditor)	Maldives
Mr. Seymur Mirzayev (Observer Auditor)	Azerbaijan

#### **5 Involved Officials from the Member State**

5.1 Capt. Cahit Yalcin, Ministerial Counsellor, Ministry of Transport, Maritime Affairs and Communications served as the central point of contact (CPC) for the audit team. For the participants at the meetings and interviews see appendix 2.

#### **6 Acknowledgement**

6.1 The audit team wishes to express their thanks to all of the Turkish government organizations that participated in the audit and for their support and cooperation during this audit. The team would like to acknowledge the warm welcome provided by the Deputy-Undersecretary Mr. Suat Hayri Aka, who underlined the strong commitment of his organization to the objectives of the Voluntary IMO Member State Audit Scheme. Special thanks is extended to Capt. Cahit Yalcin, Ministerial Counsellor, Ministry of Transport, Maritime Affairs and Communications, for serving as the CPC for the audit team and for providing planning and logistical support during the preparation for this audit and throughout the visit of the audit team. The audit team would further like to highlight in particular, the crucial support provided by the Member State through the translation of all relevant national legal provisions into English prior to the audit. This has helped the audit team tremendously in the preparation and conduct to the audit and demonstrated the full commitment of the Member State to the audit principles under the Code.

#### **7 Scope, objectives and activities of the Audit**

7.1 The Scope of the audit addressed flag, port and coastal State obligations of Turkey.

7.2 The objectives of the audit were to:

- .1 determine the extent to which Turkey met the obligations imposed upon it through its adoption of the following applicable mandatory IMO instruments:
  1. the International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS 1974);
  2. the International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating thereto, as amended (MARPOL 73/78, Annexes I, II, and V);

3. the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers 1978, as amended (STCW 1978);
4. the International Convention on Load Lines, 1966 (LL 66);
5. the Protocol of 1988 relating to the International Convention on Load Lines, 1966;
6. the International Convention on Tonnage Measurement of Ships, 1969 (Tonnage 1969); and
7. The Convention on the International Regulations for Preventing Collisions at Sea, 1972, as amended (COLREG 1972).

.2 determine the effectiveness of the implementation of these objectives.

7.3 Implicit in the scope of the audit is also the degree of compliance with the Code which mirrors many of the references set out in the applicable mandatory IMO instruments.

7.4 The audit was conducted using the programme set out in appendix 2. The methodology used included a series of visits, interviews, examination of written records, computer databases, and other objective evidence which would determine the extent to which the maritime administration of Turkey achieved the objectives of the audit.

7.5 The programme followed a process which sought initially to determine the strategy for the implementation of the IMO instruments, the review processes in place and the arrangements for continual improvement. Following this, an examination was made of the national legislation in place which provides the instruments with force of law in Turkey. Also, the processes by which Turkey develops and makes known its interpretations, policies and instructions regarding these instruments, as well as the practical implementation of these arrangements were also examined.

7.6 An opening meeting was conducted on Monday, 30 September 2013 in Ankara, in accordance with the Procedures of the Scheme (resolution A.974(24)) and the agenda. The agenda is attached as appendix 3 to the annex of this report and it was agreed that the audit findings would be communicated to the Ministry of Transport, Maritime Affairs and Communications for comments on a daily basis with agreement at the closing meeting which was held on Monday, 7 October 2013. A draft interim report was tabled at the closing meeting to assist in focussing discussion and the next steps to be taken.

## **8 Overview and general maritime activities of the State**

### **8.1 General**

8.1.1 Until 1 November 2011 maritime affairs were handled by an Under-Secretariat within the responsibility of the Prime Minister. On 1 November 2011 the Ministry of Transport, Maritime Affairs and Communications was established on the basis of Law no. 655 as the lead administration for maritime affairs in Turkey.

8.1.2 Moreover, on a ministerial level, the Ministry of Transport, Maritime Affairs and Communications acts as the maritime administration for IMO related issues (implementation of the IMO instruments) according to Law no. 655.

8.1.3 Within the Ministry, six Directorate Generals were established to be responsible for the issues related to maritime activities headed by a Deputy Under-Secretary:

- Directorate General for Regulation of Maritime and Inland Waters;
- Directorate General of Shipyards and Coastal Structures;
- Directorate General for Regulation of Dangerous Goods and Combined Transportation;
- Directorate General of Merchant Marine;
- Directorate General of Foreign Relations and European Union Affairs;
- and
- Directorate General of Coastal Safety (Affiliated Body).

8.1.4 With regard to the provincial organization, the Ministry of Transport, Maritime Affairs and Communication conducts its field services through Harbormasters' offices. The provincial organization consists of 72 Harbormasters' offices with 187 ship inspectors employed to carry out flag and port State controls on behalf of the maritime authority of Turkey.

8.1.5 Auxiliary service units within the Ministry providing services for tasks under the Code are the independent Accident Investigation Board, the Ship Inspection Board and the Department of Strategy Development.

8.1.6 Related maritime administrations other than the Ministry of Transport, Maritime Affairs and Communications, are the Ministry of Environment and Urbanization, the Ministry of Interior, the Turkish Naval Forces, the Coast Guard Command, the Office of Navigation, Hydrography and Oceanography (Turkish Naval Forces). These organizations are responsible for executing maritime duties covered by the instruments under the Code on the basis of their own organizational guidelines and regulations.

### ***Strategy***

8.1.7 The legal base of the Turkish IMO Strategy is provided by the Prime Minister's Circular (no. 2010/23). A first IMO Strategy was defined in 2011 by the Maritime Under-Secretariat based on this Circular. When the maritime administration was restructured in the end of 2011 and the Ministry of Transport, Maritime Affairs and Communications was established, this strategy was reviewed and a revised strategy to meet the objectives of the Code was established in 2013.

8.1.8 Regarding overall coordination of all maritime related entities of Turkey, at first "International Maritime Forums Coordination Commission" was established in 1996. After the formation of the new Ministry, a new body, the "Maritime Coordination Commission" replaced the old consultative framework. While the current systems were only implemented earlier in 2013, the audit team found that strategy and overall coordination systems are in line with the provisions of the Code.

8.1.9 The strategy was obviously developed in close cooperation among all entities concerned. There were consultations among the various organizations that allowed for input of all parties concerned. The strategy was known to various persons that were interviewed on this issue on a random basis. The strategy was also on display in various government offices visited during the audit.

### ***Legislation***

8.1.10 It became obvious during the audit that Turkey has made a lot of efforts since 2011 when the Ministry of Transport, Maritime Affairs and Communication was established and the maritime administrative framework was completely reorganized. A number of important instruments were implemented in this period of time and the effort made is recognized by the audit team.

8.1.11 However, it also was found that a number of circulars and guidelines were only adopted and published within the last few weeks and days prior to the audit (e.g. circulars on issues related “to the satisfaction of the administration” – Implementation Order 2013/211 dated 30 September 2013). As such it was not fully possible for the audit team to verify the effectiveness of the implementation of the newly adopted guidelines.

### ***Records and improvement***

8.1.12 Records were found to have maintained by the relevant administrations visited during the audit. Random checks were made and all records requested by the audit team were made readily available.

8.1.13 The key instrument for overall performance monitoring and review is the IMO-PERGE system. This system looks at 33 different key performance indicators (KPIs). There is a special department for maintaining this system known as the Strategy Department. All departments with tasks monitored by the IMO-PERGE system report to the Strategy Department about the status of their individual activities monitored by IMO-PERGE. Twice a year, a report is prepared by the Strategy Department and submitted to all involved Director Generals reflecting the status of affairs in the different KPIs. The report also contains statements on corrective action needed for the different KPIs. Twice a year, evaluation and corrective action meetings are carried out with the participation of top management, under the chairmanship of the Deputy-Undersecretary.

8.1.14 It was noted that Turkey has made substantial efforts to systematically identify and administer its record keeping and evaluation and review of performance. The PERGE system is a central component and a good example for many databases that have been established in order to allow for the systematic work mentioned above.

## **8.2 Flag State activities**

### ***Implementation***

#### ***General***

8.2.1 Turkey is in a position to implement international instruments into national law. Once an instrument is accepted or amended and subsequently published in the Official

Gazette of the country, it becomes legally binding to Turkish ships and forms a basis for PSC of foreign ships calling Turkish ports. The Ministry of Transport, Maritime Affairs and Communications maintains expertise in various departments to provide additional guidance in the form of byelaws and to establish policies for the implementation and enforcement of these instruments.

8.2.2 The Ministry of Transport, Maritime Affairs and Communications publishes the byelaws on the website of the ministry. The procedures for the formulation and publication were explained to the audit team. The audit team did random checks in order to identify if and how several provisions of the instruments covered by the Code were implemented into national law.

***Issues covered under “to the satisfaction of the administration”***

8.2.3 Special importance was given to items covered under the issue of “to the satisfaction of the administration.” It was established that comprehensive implementation orders cover all relevant aspects of these regulations in the instruments under the Code. However, it was not possible to verify if they are effectively implemented, as some of the orders (mainly relating to SOLAS and MARPOL) were only approved and released within ten days before the audit. However, it is noted that earlier regulations were available before the new Ministerial Orders were published.

***Type approval of equipment***

8.2.4 As far as type approval of equipment is concerned, it was established that Turkey has the “Regulations for Ships Equipment” which follows an EU Directive related to marine equipment. This system is implemented since 2005 and provides for an adequate handling of this issue.

***Other obligations, such as stability calculations etc.***

8.2.5 As far as certain other mandates under the IMO instruments (e.g. stability calculations etc.) are concerned, Turkey has delegated these tasks to Recognized Organizations (ROs). This does not apply to tonnage measurement that is carried out by the Ministry of Transport, Maritime Affairs and Communications.

***STCW***

8.2.6 The total number of Turkish officers and engineers in 2013 is 44,706. The total number of Turkish ratings in 2013 is 131,786. The certification of officers, engineers and ratings is done by the Harbourmasters’ offices. Pursuant to regulation I/8 of the STCW Convention, 1978, as amended, an independent evaluation was conducted and the report was forwarded to IMO in 2009. It has been approved by IMO.

***Reporting to IMO***

8.2.7 The maritime Administration confirmed that all responsibilities with regard to reporting to IMO are fully met. The reporting is done by the Ministry of Foreign Affairs and the European Union General Directorate on the basis of the Ministerial Circular 2013/4 dated 6 March 2013. Reporting to IMO GISIS system can be directly done by involved technical departments. A random check related to a Load Line Exemption

Certificate issued in 2011 (MV **Bogazici 9** dated 15 June 2011) not reported to IMO in time revealed that reporting deficiencies existed in the past. The new arrangements made in March 2013 are supposed to address these deficiencies.

### ***General conclusions for implementation***

8.2.8 A number of instruments were implemented in this period of time. However, it also was found that a substantial number of circulars and guidelines were only adopted and published within the last few weeks and days prior to the audit. As such it was not fully possible for the audit team to verify the effectiveness of the implementation of the newly adopted guidelines. At the same time it is noted that Turkey has made substantial efforts to address relevant key safety issues and made them priority areas for the maritime administration.

### ***Delegation of authority***

#### ***Agreements between the member State and the ROs***

8.2.9 Turkey has authorized nine recognized organizations (ROs) to carry out surveys and issue certificates on behalf of the maritime Administration. Among the ROs are eight IACS classes and one non-IACS class (Turkish Lloyd).

8.2.10 For the delegation of authority agreements have been used in line with the Guidelines for the Authorization of Organizations Acting on behalf of the Administration (resolution A.739(18)). Copies of the annexes to the agreements reflecting the scope of authorization of the individual ROs have been submitted to the Organization and are available in GISIS.

### ***Monitoring of ROs***

8.2.11 Turkey has established a monitoring and oversight program for the ROs. The national legislation of Turkey requires any RO to maintain a representation office in Turkey. The monitoring and oversight program consists of annual office audits of these representation offices. All nine ROs are typically audited within the last two months of a year. The audit plans for 2012 and 2013 were verified. The audit is based on a checklist that is intended to cover the relevant provisions of the Guidelines for the Authorization of Organizations Acting on behalf of the Administration (resolution A.739(18)) and Specifications on the Survey and Certification Functions of Recognized Organizations Acting on Behalf of the Administration (resolution A.789(19)). However, it is typically assumed that just because a specific RO is an IACS member the relevant requirements of Modules 1 and 2 of resolution A.789(19) are complied with by the individual RO. The audit team has not been able to find any evidence that these modules were verified in more detail during the audits of Turkish Lloyd.

8.2.12 While it was found that one question in the audit check list relates to the country specific information given to surveyors of a RO for carrying out surveys or audits on ships entitled to fly the flag of Turkey, this information is verified only once a year during the annual audit of the RO office within the State. The requirement for individual ROs is otherwise that they have to follow all new regulations implemented by the various entities in the maritime administrative framework of Turkey independently and act accordingly in order to implement these national requirements in their surveyor

information system. Even though there are no specific descriptions of information flows and responsibilities between a flag State administration and an RO given, it was felt that this practice can easily lead to information deficits and deviating standards.

### ***RO monitoring on surveying of ships***

8.2.13 It was noted that effective enforcement provisions as a follow-up to port State control were in place. However, it was not possible to confirm the monitoring of ROs in terms of conducting supplementary surveys by the maritime administration to ensure organizations recognized by the administration are in full compliance with the provisions of the mandatory instruments referred to in the Code.

### **8.2.14 Findings**

#### ***Observation (OB)***

- .1 **Although the maritime administration very recently published an implementation order that include among others regulations for the monitoring of ROs, it was not possible to confirm the monitoring in terms of conducting supplementary surveys by the maritime administration to ensure organizations recognized by them are in full compliance with the provisions of the mandatory instruments referred to in the Code (Code, part 2, paragraphs 20.1 and 20.2). See Form A-OB-01.**

#### ***Corrective action***

*Related existing regulations will be amended and new implementation orders (as necessary) to conduct supplementary surveys will be issued for more effective monitoring of RO's implementation will be closely monitored by the responsible department and records will be kept. The date for implementation of this finding is first quarter of 2015.*

#### ***Root Cause***

As the performance of National flag ships are continuously on the rise around the world, and the RO performances are within acceptable limits, it was regarded as "pre-departure surveys" and annual RO audits were sufficient for the monitoring of RO's. This issue was identified and related "Implementation Order" was issued recently before the audit. Implementation has already started for the monitoring of RO's during supplementary surveys.

#### ***Preventive action***

Once the required regulations and implementation orders are in place, it is unlikely that there will be any non-conformities for this issue. The implementation of corrective action concerning this issue is also stated in the performance targets of the Ministry (IMO-PERGE). The State will use its periodical performance evaluation system to continuously monitor the

implementation of obligations regarding monitoring of ROs. (evaluation reports and meetings in every six months).

### ***Enforcement***

8.2.15 It was established that Turkey has a system to impose fines and penalties in case of violations of any of the requirements under the mandatory instruments. The system is embedded in the national legal framework of Turkey. The various provisions for penalties and fines in different national legislations were presented to the audit team. The key personnel for penalties and fines are the harbour masters in the various port facilities of the country.

8.2.16 Examples of statistics and records were presented to the audit team demonstrating that penalties and fines on various levels are applied for several years. Especially ISM related deficiencies are given a high priority and lead to severe measures against a company (e.g. monthly audits for a period of three years in case of detention during a PSC as a result of ISM related deficiencies).

8.2.17 Turkey is in a position to impose penalties and fines against foreign ships through a system that requires foreign ships entering Turkish ports or passing through the Turkish straits to work with a Turkish agent. If a ship commits a violation against any of the instruments covered by the Code, the agent is notified and necessary action on rectification measure by the agent is expected. There are appeals provisions and procedures in case of unjustified penalties and fines after the fines were paid initially.

8.2.18 Penalties and fines are covered by the performance monitoring system IMO-PERGE. They are reported twice a year to higher administrative levels. However, no evidence was presented that a systematic review and evaluation of underlying causes and factors leading to penalties and fines is undertaken.

8.2.19 It was established that Turkey has a structure in place that allows for effective enforcement of the national regulations given meaning to the mandatory IMO instruments.

### ***Flag State surveyors***

#### ***Training and qualifications of the flag State surveyors***

8.2.20 The maritime administration has introduced a coordinated technical training system called "UDHB Certificated Technical Training Program (STEP)" in order to ensure that the personnel of the Ministry assigned to technical maritime responsibilities perform their duties in an efficient way. The purpose of the training system is to qualify the personnel for various technical surveys by means of initial training and refresher training sessions.

8.2.21 It is planned to provide periodic training for the specialists and the personnel performing technical maritime duties of the Ministry. The specialists and the personnel performing technical maritime duties including flag State surveyors are recorded in the STEP system with their authorizations to carry out their specific tasks and duties. Furthermore, plans for their future training are recorded in a centralized corporate training plan of the STEP system.

8.2.22 The Harbourmasters review the qualifications of the flag State surveyors on a running basis in cooperation with the surveyors and they will communicate their proposals to the STEP Executive Secretariat of the Ministry regarding upgrading of the individual flag State surveyor including new training modules to be completed.

8.2.23 The Secretariat ensures the updating and execution of the STEP system.

8.2.24 During the audit examples of good practice to administer and monitor the qualification and further development of individual flag State surveyors were found. The STEP system as an administrative tool for these purposes should be mentioned here specifically. As a result the retention rate of employees in the administration is high and employment is in general considered attractive.

### ***Work performance of the of the flag State surveyors***

8.2.25 Flag State surveys – both scheduled and unscheduled surveys - are performed on a level defined in the national legislation. In addition, for the last eight years the maritime administration implements a proactive “PSC preparation survey scheme” and targets high risk ships, before they are subject to PSC abroad. These preparatory surveys are only carried out on board Turkish vessels before leaving Turkish ports. This proactive system is highly useful as the performance of ships entitled to fly the flag of Turkey on foreign PSC inspections is continuously improving over the last eight years.

8.2.26 Flag State surveyors approach the scheduled and unscheduled inspections in a very systematic manner. The maritime Administration conducts about 2200 unscheduled surveys annually. Most of these extra surveys are for domestic ships, but a large portion is under “PSC preparation inspections” as defined above. The surveyor is planning the survey through review of all available information sources and records include the flag State inspection system (the specific database for this purpose). The inspection is carried out using a manual checklist which is updated in the electronic database (flag State inspection system) after the inspection has been completed on board.

8.2.27 The ID cards of the surveyors were presented to the audit team.

8.2.28 During the audit, it was only possible to show one example of RO monitoring on surveying of ships done in 2012. The record was a copy of a letter from the RO with a handwritten note from the surveyor regarding the necessary follow up upon a RO related deficiency noted during an inspection on board. It was noted that the deficiency was reported locally by telephone to the relevant RO, but it was not reported to the Ministry of Transport, Maritime Affairs and Communication for a more systematic follow up or learning of lessons (Refer to paragraph 8.2.15 of this report and the related observation A-OB-01).

### ***Flag State investigations***

8.2.29 It was noted that Turkey has made substantial efforts to meet the requirements of the IMO Casualty Investigation Code, 2008 (resolution MSC.255(84)). An independent accident investigation board was established in 2011. There are a number of items of positive development implemented in the standard practice of the accident investigation

board, such as international cooperation with other member States during accident investigations and reporting into the GISIS system.

8.2.30 However, it was also noted that relevant chapters of the mandatory part of the IMO Casualty Investigation Code are not accepted in Turkey's national law. One vital issue in this respect was that until very recently surveyors of the Harbourmasters' offices who are otherwise involved in implementation and enforcement tasks were involved in safety accident investigations.

8.2.31 It was also found that on 4 out of 11 very serious accidents that occurred in 2013 which would require investigation under the Casualty Investigation Code, no action was taken.

### **8.2.32 Findings**

#### ***Non-conformity (NC)***

- .1 The provisions of the IMO Casualty Investigation Code, 2008 (resolution MSC.255(84)) are not fully implemented. The provisions that are not met are:**
  - .1 that not all very serious casualties have been investigated;**
  - .2 flag State inspector involved in enforcement tasks could also be used for casualty investigation;**
  - .3 casualty investigation reports were not published; and**
  - .4 a systematic analysis of casualty investigations was not performed.(IMO Casualty Investigation Code, 2008 (resolution MSC.255(84), Part II, paragraphs 6.1 and 6.2, 11.1 and 14.4; Code, part 1, paragraph 7, part 2, paragraphs 40, 41). See Form A-NC-01.**

#### ***Corrective action***

*The Casualty Investigation Board will complete its legal, logistics and human resources needs as soon as possible and correct the findings accordingly. There are already two new technical investigators appointed to the Board. The date for the implementation of this finding is second quarter of 2015.*

#### ***Root cause***

As the Casualty Investigation Board was recently established at the end of 2011, its legislative, administrative, logistics and personnel resources needs were not yet fully obtained and realized. The Board was working with limited resources.

### ***Preventive action***

Once the required resources are in place, it is unlikely that there will be non-conformities regarding the marine casualty investigations. The implementation of corrective action concerning this IMO audit finding is already included in the performance targets of the Ministry (IMO-PERGE). The State will use its periodical performance evaluation system for continuous monitoring of the implementation of obligations regarding casualty investigations. (evaluation reports and meetings in every six months).

### ***Evaluation and review***

8.2.33 Respective departments of the maritime administration have implemented their own sub-systems for performance evaluation. The general approach is similar to the broader IMO-PERGE system mentioned in paragraph 8.1.13. Different “specialized” key performance indicators are used by each department. The heads of the departments evaluate and report twice a year about the performance.

## **9 Port State activities**

9.1 The audit team assessed the activities of Turkey on port State control and port reception facilities, as tasks under the port State activities of a member State.

### ***Port State control***

9.2 Turkey has been a member of the Mediterranean MOU on PSC (Med MoU) since 1997. It has also been a member of the Black Sea MOU on PSC (BS MoU) since 2000.

### ***Training and qualifications of the Port State control officers (PSCOs)***

9.3 PSCOs are recorded in the STEP system with their authorizations to carry out PSC inspections. Furthermore their future planned training is recorded in the centralized corporate training plan of the STEP system.

### ***Performance of the of the PSCOs***

9.4 PSC is performed in Turkey on a level defined by the MOUs. PSC is carried out on board foreign vessels calling Turkish ports and it was confirmed that the objectives regarding the number of PSC inspections to be carried out exceed the requirements of both the Med MoU and the BS MoU (national target inspection percentage in 25%, MoU target 20%).

9.5 PSCOs conduct inspections in a systematic manner. The PSCOs plan the survey through review of all available information sources and records; include the information available through the MoUs. Guidance on applicable international regulations (rule finder) is also available for PSCOs.

9.6 PSC is carried out using a manual checklist which is updated in the electronic database of the MoU once an inspection is completed on board.

***Port reception facilities***

9.7 Port reception facilities fall under the responsibility of the Ministry of Environment and Urbanization. The information provided to the audit team was that reception facilities are available in 233 port facilities in Turkey. One hundred and three individual waste reception facilities have been established to receive the waste from these port facilities.

9.8 These reception facilities are typically managed by the individual municipalities. Agreements between the Ministry of Environment and Urbanization and the individual Municipalities have been concluded. The facilities are certified and monitored by the Ministry of Environment and Urbanization. Relevant IMO guidance is taken into consideration for the establishment and dimension of individual reception facilities. An online system (GATS) allows individual ships via their agents to report their intentions to discharge waste and make the necessary arrangements. During the audit one reception facility was visited in Istanbul.

9.9 Port reception facilities are available in Turkish ports taking the relevant provisions of MARPOL Annexes I, II and V into account. The maritime administration confirmed that all port reception facilities are operational.

**10 Coastal State activities**

10.1 The audit team inspected Vessel Traffic Service (VTS), aids to navigation, promulgation of navigational warnings, hydrographic services, charts and nautical publications, search and rescue (SAR), emergency response to marine pollution as tasks under the coastal State activities of a member State.

10.2 The coastal State safety activities are effectively carried out in accordance with two main national legislations published in the Official Gazettes nos. 27238 and 26475. They are under the responsibility of the Director General of Coastal Safety to minimize the accidental damage to life, property and marine environment. Safe navigation systems have been established in the Turkish Straits and territorial waters.

***Vessel traffic services and ship routeing***

10.3 The traffic separation scheme and the reporting system for the Turkish Straits were adopted by IMO through resolution A.827(19).Rev.1 on Ships' Routeing. The maritime Administration established the Turkish Straits Vessel Traffic Services (TSVTS) with a view to enhance the safety of navigation, life, property and protection of the marine environment. The system of the TSVTS was put into operation in 2003. This system enables safe passage of approximately 55,000 ships per year by way of continuous monitoring the ships and providing the necessary navigational guidance and assistance.

10.4 Another Vessel Traffic Management System (VTMS) project was contracted out in 2009 and is still in the installation phase. With this project, it is planned to establish a Vessel Traffic Management Centre in Ankara and its back-up in Izmit and three vessel traffic service centres in the areas of İzmit, İzmir, Mersin and İskenderun. This new VTS system will consist of 24 remote sensor sites and three VTS centres, allowing for

effective services of information, navigational assistance and traffic organization on the highest level in the areas indicated above.

10.5 The maritime administration completed studies regarding maritime traffic separation schemes (TSSs) for the areas around İzmir, İzmit, İskenderun, Nemrut and Aliğa. They were implemented by the "Ports Regulations" (Official Gazette no. 28453) published in 2012. The TSSs for İzmit Bay was reported to IMO through NAV 57/INF.9.

10.6 During the audit VTS were found to exist in Turkey. The relevant guidance for establishing such services, including the training and qualification requirements were applied in those VTS centres reviewed during the audit.

### ***Aids to navigation (AtoN)***

10.7 Turkey maintains AtoN in line with the relevant provisions of SOLAS Chapter V. Currently, a total of 1118 visual AtoN deliver service all around the Turkish coast. Relevant IALA guidance for AtoN is taken into consideration.

10.8 Principles and procedures, duties, authority and responsibilities for installation, operation and maintenance of all aids to navigation which are installed or are to be installed are identified in the "Regulations on Navigational Aids" established in 2009 (Official Gazette no. 27238).

10.9 The control of all AtoN is handled by a fully integrated system called SOTAS. This system allows for a verification of the functioning of each individual AtoN. A technical service network established along the coast with one central workshop and ten technical offices provides maintenance services.

10.10 Provisions reviewed during the audit related to aids to navigation were found to be in line with the relevant provisions of SOLAS Chapter V. The fully integrated SOTAS system for the remote control and monitoring of the functioning of the AtoN can be considered as an example of good practice.

### ***Promulgation of navigational warnings***

10.11 Navigational warnings are promulgated by Turk Radio on the basis of shared responsibilities between the Directorate General of Coastal Safety (DGCS) and the Office of Navigation, Hydrography and Oceanography (ONHO). The information services provided by Turk Radio relate to navigation, meteorology and SAR.

10.12 Relevant national legislation provisions as a basis for these services have been established.

10.13 The services reviewed during the audit with regard to the relevant requirements of SOLAS Chapter V related to navigational warnings and meteorological services.

### ***Hydrographic services, charts and nautical publications***

10.14 The Department of Navigation and Hydrography carries out navigation and hydrography services within the territories of Turkey under the supervision of the Navy command on the basis of Law no. 1738. The services include:

- .1 conducting hydrographic, oceanographic and geophysical surveys, research and assessments for military, economic and scientific purposes;
- .2 coordinating hydrographic, oceanographic and geophysical surveys and studies conducted by public and private organizations and persons;
- .3 assessments to ensure safety of life and property in oceans and to give opinions during the preparation of projects and plans for various facilities to be built or contracted to third parties by competent bodies as well as regulations concerning maritime traffic, ports and waterways for safety and facilitation of navigation; and
- .4 assuring the safety of life and property in and on the seas, to review and verify notices and to publish them accordingly.

10.15 It should also be noted that, in order to ensure that the navigation, hydrographic, oceanographic, and geophysical works are functional, the Department of Navigation and Hydrography prepares, compiles and publishes special maps, plans, books and brochures, sea maps and nautical publications for relevant units, organizations and persons.

10.16 The arrangements reviewed during the audit were in compliance with the relevant provisions of SOLAS Chapter V in relation to hydrographic services, charts and nautical publications.

#### ***Search and rescue (SAR) services***

10.17 The Turkish search and rescue organisation consists of the Main Search and Rescue Coordination Centre (MSRCC) under the Directorate General of Marine and Inland Waters and the Turkish Coast Guard Command (TCGC) under the Ministry of Interior.

10.18 The MSRCC is responsible for the COSPAS-SARSAT System, Automatic Identification System (AIS), activities against piracy, tele-medical system, pollution prevention at sea and long range identification and tracking system (LRIT).

10.19 The TCGC is responsible for conducting search and rescue operations, law enforcement activities and prevention tasks related to pollution at sea and the protection of natural resources.

10.20 Periodic “communication” exercises as mentioned in MSC Circ. 1079 paragraph 9.5 are regularly carried out.

#### ***Emergency response to marine pollution***

10.21 Emergency response to marine pollution tasks are jointly undertaken by the Ministry of Environment and Urbanization and the Ministry of Transport, Maritime Affairs and Communication. A joint Marine Environmental Coordination Committee is coordinating the activities between the two ministries.

10.22 Several examples of good practice were found during the audit showing that Turkey is taking the response to marine environmental pollution very seriously. Among these examples were risk based assessments of the whole coastline in order to determine where stockpiles of emergency response capabilities should be stored, substantial investments into a national emergency response centre with training and research capabilities as well as regular training measures for individual staff members and the various organizations which are part of the emergency response framework in Turkey.

10.23 Emergency response measures to marine pollution reviewed during the audit were considered to be in line with the requirements of the relevant IMO instruments.

## **11 Conclusions**

### **11.1 Areas of positive development**

11.1.1 Areas of positive development include:

- .1 the availability of a strategy required by the Code. The strategy was obviously developed in close cooperation among all entities concerned. There were consultations among the various organizations that allowed for input of all parties concerned. The strategy was known to various persons that were interviewed on this issue on a random basis. The strategy was also on display in various government offices visited during the audit;
- .2 the systematic approach to record keeping and evaluation of overall performance. It was noted that Turkey has made substantial efforts to systematically identify and administer the obligations with regard to record keeping and evaluation and review of performance. The IMO-PERGE system is a central component and a good example for many databases that have been established in order to allow for the systematic work mentioned above;
- .3 a proactive approach to maritime safety with demands beyond the requirement of the instruments covered by the Code. It is noted that Turkey has made substantial efforts to address relevant key safety issues and made them priority areas for the maritime administration. It should be highlighted that the implementation of the ISM Code and the additional requirements for the approval of DPAs can be considered as an example for good practice in this respect;
- .4 the maritime administration has a proactive approach to maritime safety with demands beyond the requirement of mandatory IMO instruments. For the last eight years the administration implements a proactive "PSC preparation survey scheme" and surveys high risk ships, before they are subjected to PSC inspections abroad. These preparatory surveys are carried out on board Turkish vessels before leaving Turkish ports. This proactive system is useful as the performance of ships entitled to fly the flag of Turkey on foreign PSC inspections has improved over the last

eight years. Turkey as a flag State has moved from the black to the grey list of Paris MoU in 2006 and is now on the white list since 2008;

- .5 the maritime administration implements a systematic, formal and periodical technical training system for all technical personnel of the administration. The system consists of basic and refresher trainings and 385 officers and other personnel are recorded in the system so far.
- .6 provisions reviewed during the audit related to aids to navigations were found to be in line with the relevant provisions of SOLAS Chapter V. The fully integrated SOTAS system for the administration and monitoring of the functioning of the AtoN can be considered as an example of good practice; and
- .7 the arrangements made in recent years with regard to emergency response capability. The current establishment of a national emergency response centre with training and research capabilities as well as the risk based distribution of emergency response material are examples of good practice.

## **11.2 Areas for further improvement**

### 11.2.1 Areas for further development include:

- .1 the continuous implementation of international requirements in relevant guidelines and policies. While it is noted that substantial efforts were made in recent years to implement international instruments under the Code, it was also noted that a large number of guidelines and circulars were only adopted in recent weeks and days before the audit. The maritime administration may also reconsider in this respect the way how new or revised orders and circulars are announced to stakeholders in the maritime community. It was noted so far, that all stakeholders, such as ROs are requested to check the websites of the Ministries frequently. It might be worthwhile to consider additional communication options. Simple email alerts when new or revised regulations are available may help to inform all stakeholders in a more efficient way;
- .2 effective training between SAR services and passenger ships. It is noted that MSC Circ. 1079 (10 July 2003) specifies three different types of exercise, i.e. full-scale or live, coordination, and/or communications exercises may all be appropriate, so long as the fundamental principle of cooperation between the ship, the company and SAR services is exercised. Table-top exercises, SAR seminars and liaison exchanges involving ship's personnel, shore-based company emergency response personnel and SAR service personnel can also be beneficial. The audit has shown a number of issues where Turkey goes beyond the requirements in the regulations of the instruments covered by the Code. In the light of the importance of Turkey as a major cruise line destination and by considering the large number of passenger ships, it would be worthwhile to consider if the SAR exercises with passenger ships other

than just communication exercises could be another area for special attention and requirements; and

- .3 other areas where improvement is possible relate to the publication of accident reports which so far is not done, as well as the systematic evaluation of accident trends with the help of databases etc. This is specifically related to the human element contribution in maritime accidents that so far is not systematically evaluated.

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**12 Annexes**

**Annex 1**

**12.1 *Observations***

Form A-OB-01  
Form B-OB-01

**Annex 2**

**12.2 *Non-conformities***

Form A-NC-01  
Form B-NC-01

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## ANNEX 1

## VOLUNTARY IMO MEMBER STATE AUDIT SCHEME

(Form A)

<b>FINDINGS</b>	
<b>Member State:</b> Turkey	<b>Audit Period:</b> 30 September - 07 October 2013
<b>Department:</b>	<b>File No.:</b>
<b>Non-Conformity No.:</b>	<b>Observation No.:</b> OB-01
<p><b>FINDINGS:</b></p> <p>It was not possible to confirm the monitoring of ROs in terms of conducting supplementary surveys by the maritime administration to ensure ships entitled to fly the Turkish flag are in full compliance with the mandatory instruments under the Code.</p>	
<p><b>APPLICABLE PROVISIONS OF THE AUDIT STANDARD:</b></p> <p><i>Code, part 2, paragraphs 20.1 and 20.2 – Delegation of authority – The flag State should establish or participate in an oversight programme with adequate resources for monitoring of, and communication with, its recognized organizations in order to ensure that its international obligations are fully met, by:</i></p> <ul style="list-style-type: none"> <li><i>.1 exercising its authority to conduct supplementary surveys to ensure that ships entitled to fly its flag in fact comply with mandatory IMO instruments;</i></li> <li><i>.2 conducting supplementary surveys as it deems necessary to ensure that ships entitled to fly its flag comply with national requirements which supplement the IMO convention requirements.</i></li> </ul>	
<p><b>Auditor:</b> Jens Schröder-Hinrichs Hemming Hindborg Ibrahim Yasir Seymur Mirzayev</p>	<b>Date:</b> 02 October 2013
<b>Team Leader:</b> Jens Schröder-Hinrichs	<b>Date:</b> 05 October 2013
<b>Member State:</b>	<b>Date Received:</b> 07 October 2013

## (Form B)

<b>CORRECTIVE ACTION PLAN AND FOLLOW-UP ACTION</b>					
<b>Member State</b>		Turkey		<b>Audit Period :</b> 30 Sep-07 Oct 2013	
<b>Department:</b>		Ministry of Transport, Maritime Affairs and Communications, General Directorate for the Regulation of Maritime and Internal Waters		<b>Auditor:</b>	
<b>Findings Type:</b>		Observation	<b>No.</b> 1	<b>File No:</b>	Form B-OB-01
<b>Proposed Corrective Action:</b>					
<i>Related existing regulations will be amended and new implementation orders (as necessary) to conduct supplementary surveys will be issued for more effective monitoring of RO's.</i>					
<i>Implementation will be closely monitored by the responsible department and records will be kept.</i>					
Target date First Quarter, 2015					

<b>For Action:</b>		
Member State:	Ministry of Transport, Maritime Affairs and Communications / General Directorate for the Regulation of Maritime and Internal Waters	06 Dec 2013
	_____	_____
	Name	Date
Copies to:	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	_____	_____
	Name	Name
(Date Received):	_____	_____
	Date	Date



<b>Verification of Effective Implementation:</b>			
Sign-off, as appropriate:			
<b>Member State Representative</b>	<b>Date</b>	<b>Audit Team Leader</b>	<b>Date</b>
<b>Relevant Department Head</b>	<b>Date</b>	<b>IMO Secretariat</b>	<b>Date</b>

<b>Comments (if any):</b>	
<b>Audit Team Leader</b>	<b>Date</b>

## ANNEX 2

## VOLUNTARY IMO MEMBER STATE AUDIT SCHEME

(Form A)

<b>FINDINGS</b>	
<b>Member State:</b> Turkey	<b>Audit Period:</b> 30 September - 07 October 2013
<b>Department:</b>	<b>File No.:</b>
<b>Non-Conformity No.:</b> NC-01	<b>Observation No.:</b>
<p><b>FINDINGS:</b></p> <p>The provisions of the IMO Casualty Investigation Code are not fully implemented. The provisions that are not met are:</p> <ul style="list-style-type: none"> <li>.a that not all very serious casualties have been investigated,</li> <li>.b flag State inspector involved in enforcement tasks could also be used for casualty investigation,</li> <li>.c casualty investigation reports were not published, and</li> <li>.d a systematic analysis of casualty investigations was not performed.</li> </ul>	
<p><b>APPLICABLE PROVISIONS OF THE AUDIT STANDARD:</b></p> <p><i>Casualty Investigation Code, 2008, Part II, Chapter 6.1 – Requirement to investigate very serious marine casualties – A marine safety investigation shall be conducted into every very serious marine casualty.</i></p> <p><i>Casualty Investigation Code, 2008, Part II, Chapter 11 – Investigation not to be subject to external direction – Marine safety investigating State(s) shall ensure that investigator(s) carrying out a marine safety investigation are impartial and objective. The marine safety investigation shall be able to report on the results of a marine safety investigation without direction or interference from any persons or organizations who may be affected by its outcome.</i></p> <p><i>Casualty Investigation Code, 2008, Part II, Chapter 14.4 – Marine safety investigation reports – The final marine safety investigation report shall be made available to the public and the shipping industry by the marine safety investigating State(s), or the marine safety investigating State(s) shall undertake to assist the public and the shipping industry with details, necessary to access the report, where it is published by another State or the Organization.</i></p> <p><i>Code, part 1, paragraph 7 – Initial actions – When a new or amended IMO mandatory instrument enters into force for a State, the Government of that State must be in a position to implement and enforce its provisions through appropriate national legislation and to provide the necessary implementation and enforcement infrastructure. This means that the Government of the State must</i></p>	

have:

- .1 *the ability to promulgate laws which permit effective jurisdiction and control in administrative, technical and social matters over ships flying its flag and, in particular, provide the legal basis for general requirements for registries, the inspection of ships, safety and pollution-prevention laws applying to such ships and the making of associated regulations;*
- .2 *a legal basis for the enforcement of its national laws and regulations including the associated investigative and penal processes; and*
- .3 *the availability of sufficient personnel with maritime expertise to assist in the promulgation of the necessary national laws and to discharge all the responsibilities of the State, including reporting as required by the respective conventions.*

**Code, part 2, paragraph 40 – Flag State investigations** – *Any accidents involving personal injury necessitating absence from duty of three days or more and any deaths resulting from occupational accidents and casualties to ships of the flag State should be investigated, and the results of such investigations made public.*

**Code, part 2, paragraph 41 – Flag State investigations** – *Ship casualties should be investigated and reported in accordance with the relevant IMO conventions, and the Codes developed by IMO. The report on the investigation should be forwarded to IMO together with the flag State's observations, in accordance with the guidelines referred to above.*

<b>Auditor:</b> Jens Schröder-Hinrichs Ibrahim Yasir	<b>Date:</b> 04 October 2013
<b>Team Leader:</b> Jens Schröder-Hinrichs	<b>Date:</b> 05 October 2013
<b>Member State:</b>	<b>Date Received:</b> 07 October 2013

## (Form B)

<b>CORRECTIVE ACTION PLAN AND FOLLOW-UP ACTION</b>					
<b>MemberState</b>	Turkey		<b>Audit Period:</b>	30 Sep-07 Oct 2013	
<b>Department:</b>	Ministry of Transport, Maritime Affairs and Communications, Casualty Investigation Board		<b>Auditor:</b>		
<b>Findings Type:</b>	Non-conformity	<b>No.</b>	1	<b>File No:</b>	Form B-NC-01
<b>Proposed Corrective Action:</b>					
<i>The Casualty Investigation Board will complete its legal, logistics and human resources needs ASAP and correct the findings accordingly. There are already 2 new technical investigators appointed to the Board.</i>					
Target date Second Quarter, 2015					

<b>For Action:</b>		
MemberState:	Ministry of Transport, Maritime Affairs and Communications / Casualty Investigation Board	06 Dec. 2013
	_____	_____
	Name	Date
Copies to:	<input type="checkbox"/> _____	<input type="checkbox"/> _____
	Name	Name
(Date Received):	_____	_____
	Date	Date

<b>Root Cause:</b>
<i>As the Casualty Investigation Board was recently established in end of 2011, its legislative, administrative, logistics and personnel resources needs were not yet fully obtained and realized. The Board was working with limited resources.</i>

**Proposed Preventive Action:**

*Once the required resources are in place, it is unlikely that there will be non-conformities regarding the marine casualty investigations.*

*The implementation of corrective action concerning this IMO audit finding is already included in the performance targets of the Ministry (IMO-PERGE). The State will use its periodical performance evaluation system for continuous monitoring of the implementation of obligations regarding casualty investigations. (evaluation reports and meetings in every 6 months)*

**Action Plan Submitted:**

By Capt. H. Cahit YALCIN On 06 December 2013

To: Audit Team Leader: \_\_\_\_\_ IMO Secretariat: \_\_\_\_\_  
Name Name

For Review:  For Information:

Signature Date Signature Date

Copies to:  Mr.SuatHayri AKA, Deputy Undersecretary, Ministry of of Transport, Maritime Affairs and Communications

**Action Implemented:**

By \_\_\_\_\_ On \_\_\_\_\_

**Verification of Effective Implementation:**

Sign-off, as appropriate:

<b>MemberState Representative</b>	<b>Date</b>	<b>Audit Team Leader</b>	<b>Date</b>
<b>Relevant Department Head</b>	<b>Date</b>	<b>IMO Secretariat</b>	<b>Date</b>
<b>Comments (if any):</b>			
<b>Audit Team Leader</b>		<b>Date</b>	

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**Appendices**

Appendix 1 Organizations visited during the audit

Appendix 2 Participants, programme and timetable for the audit of Turkey, 30 September to 7 October 2013

Appendix 3 Agenda of the opening meeting

**APPENDIX 1**

**ORGANIZATIONS VISITED DURING THE AUDIT**

- 1 Ministry of Transport, Maritime Affairs and Communications (MTMAC)
- 2 Ministry of Environment and Urbanization (MEU)
- 3 Turkish Coast Guard Command (TCG)
- 4 Main SAR Coordination Center (SARCC)
- 5 Directorate General of Coastal Safety (DGCS)
- 6 Office of Navigation, Hydrography and Oceanography (ONHO)
- 7 Commission for the Investigation and Analysis of Casualties (CIAC)
- 8 Istanbul Municipality, Port Reception Facility of Haydarpasa Port (Istanbul)  
(IMPRF)

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## APPENDIX 2

**PARTICIPANTS, PROGRAMME AND TIMETABLE FOR THE AUDIT OF TURKEY  
30 SEPTEMBER TO 7 OCTOBER 2013**

Monday September 30 Day 1	Tuesday October 01 Day 2	Wednesday October 02 Day 3	Thursday, October 03 Day 4 – ISTANBUL	Friday October 04 Day 5
<p>1000-1030 Opening Meeting. (All interested parties) (Ministry conference hall)</p> <p>1045 – 1130 Structure and division of responsibilities of Administration (Cisel ASLAN Head of Dept., DG Foreign Relations; Hanifi GULER, Expert, DG Foreign Relations ; Ozgur AVCI, Ass. Expert, DG Foreign Relations) (Building C – 3<sup>rd</sup> floor meeting room)</p> <p>1145 – 1230 Overall Maritime Policy and Strategy (Cisel ASLAN Head of Dept., DG Foreign Relations; Hanifi GULER, Expert, DG Foreign Relations; Ozgur AVCI, Ass. Expert, DG Foreign Relations) (Building C – 3<sup>rd</sup> floor meeting room)</p>	<p>0930 – 1030 Overall process description for enforcement, assessment of fines and penalties. Review of selected cases. (Nesra DOGAN, Lawyer, DG Maritime Regulations ; Eren UNAL Lawyer, DG Foreign Relations ; Alper KECELI, Expert, DG Maritime Commerce) (Building C – 3<sup>rd</sup> floor meeting room)</p> <p>1040 – 1130 STCW Implementation, manning (Team 2) (Okay KILIC, Head of Dept. DG Maritime Regulations ; Cagdas GURBUZ, Expert, DG Maritime Regulations ; Sakir DEMIREL, Expert, DG Maritime Regulations) (Building C – 3<sup>rd</sup> floor meeting room)</p> <p>1140 – 12:30 COLREGS, SOLAS Chapter IV &amp; V, navigation safety - implementing legislation and policy development (Team 2) (Omer OZCAN, Head of Dept. DG Maritime Regulations ; Tuncer URGANCI, Expert, DG Maritime Regulations : Onur SARI Expert, DG Maritime Regulations) (Building C – 3<sup>rd</sup> floor meeting room)</p> <p>1040 – 1230 SOLAS &amp; MARPOL (design and constructional issues, stability, equipment approval) , Codes and Resolutions associated with above - implementing legislation and</p>	<p>0930-1015 MARPOL pollution control, monitoring, penalties, Port Reception Facilities, Bunker fuel monitoring. Hazardous waste disposal.(MOE) (Team 1) (Murat TURAN,Head of Dept.MoE, Sedat KOCAK, Engineer, MoE, Kerem NOYAN, Expert, MoE) (MoE, 2<sup>nd</sup> floor meeting room)</p> <p>1030 – 1115 MARPOL environmental issues(Team 1) (Okay KILIC, Head of Dept. DG Maritime Regulations ; Yilmaz TASCI, Expert, DG Maritime Regulations ; Cem Orkun KIRAC) Expert, DG Maritime Regulations) (Building C – 1<sup>st</sup> floor meeting room)</p> <p>0930 – 1015 Policies and implementation on Flag State Inspections/ surveys (Team 2) (Giray YUKSEL, Head of Dept. DG Maritime Regulations ; Tamay CETIN, Expert, DG Maritime Regulations ; Alper KARAEYVAZ Expert, DG Maritime Regulations) (Building C – 3<sup>rd</sup> floor meeting room)</p> <p>1030-1115 PSC, organization, training and records (Team 2) (Giray YUKSEL, Head of Dept. DG Maritime Regulations ; Tamay CETIN, Expert, DG Maritime Regulations ; Alper KARAEYVAZ Expert, DG</p>	<p>0930 – 1100 Implementation of survey, PSC, flag state inspection policies, Implementation of MARPOL (Team 2) Interview of FSCO and PSCO (Can CILMI, FSS, Ozer OZBEY, FSS ; Muhammed KART, FSS, Onur TURHAN, FSS, Onder EYIGUN, PSCO,Zafer AKYOL, PSCO ) (GSK meeting room)</p> <p>1115 – 1230 Surveyor training, assignment and qualification, ship survey files ( Team 2) Interview of FSCO and PSCO (Can CILMI, FSS, Ozer OZBEY, FSS ; Muhammed KART, FSS, Onur TURHAN, FSS, Onder EYIGUN, PSCO,Zafer AKYOL, PSCO) (GSK meeting room)</p> <p>0930 – 1030 VTS &amp; Routeing (Team 1) (Levent KALFA Head of Dept. DG Coastal Safety ; Yavuz GUNDUZ, Manager, Hasan TERZI, VTS Operator) (KEGM crisis meeting room)</p> <p>1045 – 1145 Aids to Navigation - Implementation policy, reporting procedures, maintenance and future planning. (Team 1) (Celalettin UYSAL, Head of Dept. DG Coastal Safety ; Muhammed</p>	<p>1000 – 1130 Casualty Investigations procedures, training, records and examples of recent investigations (Team 1) (Atilla PIRALIOGLU, Expert, Accident Investigation Board) (KAİK meeting room)</p> <p>0930 – 1030 SAR (MSRCC), incident control, pollution control, rescue facilities area coordination. (Team 2) (Hakan DURMAZ, Ministerial Counsellor, MSRCC ; Omer Faruk ARAT, Expert, DG Maritime Regulations ; Omer Adem GAZIOGLU Expert, DG Maritime Regulations) (AAKKM meeting room)</p> <p>1100 – 1200 SAR &amp; pollution monitoring (Coast Guard) (Team 2) (Murat SEZGIN, Capt, Coast Guard, Kerem TAMKOC, Statistician, Ayten ATAMIS, Engineer) (Coast Guard Command, 4<sup>th</sup> floor meeting room)</p> <p>-----</p> <p>1230 – Auditors private debriefing and follow up as needed for outstanding information requested from various</p>

Monday September 30 Day 1	Tuesday October 01 Day 2	Wednesday October 02 Day 3	Thursday, October 03 Day 4 – ISTANBUL	Friday October 04 Day 5
Lunches: 12:30-13:30	<p>policy development . (Team 1) (Umut SENTURK, Head of Dept. DG Shipyards and Coastal Facilities ; Murat DINCER, Coordinator, DG Shipyards and Coastal Facilities ; Yakup KOCAMAN Expert, DG Shipyards and Coastal Facilities ) (Building C – 4<sup>th</sup> floor meeting room)</p> <p>Lunch: 12:30-13:30</p>	<p><i>Maritime Regulations</i> (Building C – 3<sup>rd</sup> floor meeting room)</p> <p>1130 – 1230 Surveyors Training, Recruitment, Qualification, record keeping (Giray YUKSEL, Head of Dept. DG <i>Maritime Regulations</i> ; Tamay CETIN, Expert, DG <i>Maritime Regulations</i> ; Alper KARAEYVAZ Expert, DG <i>Maritime Regulations</i>) (Building C – 3<sup>rd</sup> floor meeting room)</p> <p>Lunch: 12:30-13:30</p>	<p>NAR, Asst. Manager) (KEGM crisis meeting room)</p> <p>1200-1230 Promulgation of Nav. Warnings (Team 1) (Mehmet COLAK Manager, DG Coastal Safety, Pervin KESER Manager, DG Coastal Safety) (KEGM crisis meeting room)</p> <p>Lunch: 12:30-13:30</p>	<p>interviews during the week</p> <p>Lunch: 12:30-13:30</p>

Monday September 30 Day 1	Tuesday October 01 Day 2	Wednesday October 02 Day 3	Thursday, October 03 Day 4	Monday October 07 Day 6
<p>1330 – 1430 Performance Measurement (Taki SAHAN – Engineer, Strategy Dept. Gevher KAHRAMAN Expert, Strategy Dept. ; Hanifi GULER Expert, DG Foreign Relations) (Building C – 3<sup>rd</sup> floor meeting room)</p> <p>1445-1530 Legislation: Overview. Convention implementation processes, Periodic review and update, Implementation of explicit/implicit amendments. Review of recent legislative projects, (Cisel ASLAN Head of Dept., DG Foreign Relations; Hanifi GULER, Expert, DG Foreign Relations, Eren UNAL, Lawyer, DG Foreign Relations ) (Building C – 3<sup>rd</sup> floor meeting room)</p> <p>1545 – 1630 IMO non mandatory instruments- general arrangements. IMO reporting – general arrangements (Cisel ASLAN Head of Dept., DG Foreign Relations; Hanifi GULER, Expert, DG Foreign Relations ; Ozgur AVCI, Ass. Expert, DG Foreign Relations) (Building C – 3<sup>rd</sup> floor meeting room)</p> <p>1630 – Auditors private debriefing</p>	<p>1330 – 1430 - Tonnage, Load Line implementing legislation and policy development. (Team 2) (Umut SENTURK, Head of Dept. DG Shipyards and Coastal Facilities ; Murat DINCER, Coordinator, DG Shipyards and Coastal Facilities ; Yakup KOCAMAN Expert, DG Shipyards and Coastal Facilities ) (Building C – 4<sup>th</sup> floor meeting room)</p> <p>1500-1600 - Dangerous goods &amp; carriage of cargoes (Team 2) (Hakki GEDIKOGLU, Expert, DG Dangerous Goods ; Unal BAYLAN, Expert, DG Dangerous Goods) (Maltepe Building – 7<sup>th</sup> floor meeting room)</p> <p>1330 – 1600 SOLAS &amp; MARPOL operational issues, ISM, Codes and Resolutions associated with above - implementing legislation and policy development . (Team 1) (Giray YUKSEL, Head of Dept. DG Maritime Regulations ; Tamay CETIN, Expert, DG Maritime Regulations ; Alper KARAEYVAZ Expert, DG Maritime Regulations) (Building C – 3<sup>rd</sup> floor meeting room)</p> <p>1600 – Auditors private debriefing</p>	<p>1330 – 1400 Continued - Surveyors Training, Recruitment, Qualification, record keeping (Giray YUKSEL, Head of Dept. DG Maritime Regulations ; Tamay CETIN, Expert, DG Maritime Regulations ; Alper KARAEYVAZ Expert, DG Maritime Regulations) (Building C – 3<sup>rd</sup> floor meeting room)</p> <p>1400 – 1545 Recognized Organizations Delegation policy, agreements, record keeping and monitoring (Giray YUKSEL, Head of Dept. DG Maritime Regulations ; Tamay CETIN, Expert, DG Maritime Regulations ; Alper KARAEYVAZ Expert, DG Maritime Regulations) (Building C – 3<sup>rd</sup> floor meeting room)</p> <p>Evening: 19:00 Travel to Istanbul</p>	<p style="text-align: center;"><b>ISTANBUL</b></p> <p>1500 – 1600 Hydrographic services, Charts &amp; Nautical publications. Provision of weather/storm information. Provision of navigational warnings(Team 2) (Burak INAN, Lt. Comm, Hydrographic Off. Esref GUNSA Y, Capt. Hydrographic Off. ) (SHOD briefing room)</p> <p>1500- 1600 Istanbul Port Reception Facility visit (Team 1) (Halil GULUMSEYEN, PRF coordinator, Istanbul Municipality, Ruhi KELLECI, Istanbul Municipality, Rabia ZAFER, MoE) (PRF Haydarpasa Port)</p> <p>Evening: 22:00 Return to Ankara</p>	<p>10:00 Closing Meeting -Submission of draft interim report (All interested parties) (Ministry conference hall)</p>

**APPENDIX 3****AGENDA OF THE OPENING MEETING**

Ministry of Transport, Maritime Affairs and Communications, Ankara  
Monday, 30 September 2013, 9:30 a.m.

- Welcome by the CPC (Capt. Cahit Yalcin)
  - Welcome by Deputy Under-Secretary of Ministry of Transport, Maritime Affairs and Communications (Mr. Suat Hayri Aka)
  - Introduction of the Audit Team (Mr. Jens-Uwe Schröder-Hinrichs)
  - Introduction of Key Personnel in the Ministry of Transport, Maritime Affairs and Communications and other organizations participating in the audit (Mr. Suat Hayri Aka)
  - Outline of the Audit Scope and Function (Mr. Jens-Uwe Schröder-Hinrichs)
    - background history and purpose of the audit;
    - review and confirmation of the provisional audit programme, including the purpose, scope and objectives of the audit;
    - a short summary of the methods and procedures to be used in conducting the audit;
    - agreement on official communication links between the audit team and the Member States officials
    - review of facilities and administrative arrangements;
    - confirmation of an appropriate programme of visits to the Member States regional offices and other involved organizational elements;
    - agreement on time, date and place of the closing meeting and any interim meetings of the audit team and the Member States senior management;
    - agreement on procedures for documenting audit findings, providing response to such findings and agreeing them;
    - confirmation of the confidentiality of findings, i.e. the auditors are to agree with the auditees on any controls on evidence obtained during the audit and on disposal of report findings and report copies; and
    - agreement that a draft interim audit report should be tabled during the closing meeting.
  - Concluding remarks (Mr. Suat Hayri Aka).
-