

**BELÇİKA LİMANLARINDA TÜRK BAYRAKLI GEMİLERDE 2022-2025 YILLARI ARASINDA TESPİT EDİLEN EKSİKLİKLER**  
(Tutulma maddeleri Gri Renkli olarak verilmiştir)

DENETİM LİMANI	DENETİM TARİHİ	NO	REFERANS	EKSİKLİK
ANTWERPEN	21.09.2022	1	SOLAS ch.V R.19.2.3	Radar scanners (X- and S-band) are not installed clear of obstructions (just in front of top mast) resulting in false echoes. Recurrent deficiency, see inspection 10/2018 (Belgium).
		2	BWM Con. R B-2	Ballast operations are not recorded after installing the BWMS (07/2022).
		3	SOLAS ch. III R.20	Combined RB/LR davit is not ready for launching the RB by stored mechanical power. The davit is stowed above the DL LR and the accumulator bottle capacity is insufficient for launching the RB from the stowed positionThe manual slewing of the davit is hampered by the ship's railing and could not be demonstrated
		4	SOLAS CV R27	The ECDIS is not updated for more than 4 weeks, voyage ENC are not updated.
		5	SOLAS CV R.19	Nautical publications electronic back-up is not provided
		6	STCW Code Part A / PART 3	Watchkeeping officers are not familiarized with the ship's ECDISECDIS voyage planning and route monitoring, e.g. visual and radar position fixes, safety contour and safety depth settings.
		7	STCW Code Part A / PART 2	Voyage plan monitoring not conducted in accordance with the prepared plan: no manual position fixes found on the ECDIS as required by the voyage planVoyage ENC are not up to date. Back-up electronic nautical publications are not
		8	BWM. R.B-1	The amended BWMP for D2 compliance is not available in the working language (Turkish)
		9	SOLAS C II-2 R10.5	On water mist system the delivery valve between the pump and the actuators found closed
		10	ICLL ANI / R20	WBT vent heads are not properly maintained: several bolts are missing from the top covers.
		11	STCW Code Part A /Section A-VIII/1	UMS call-outs are not recorded on the rest hour recordsThe total minimum hours of rest in any 24h and any 7 day period is not calculatedcompliance with the minimum rest hour requirements is not verified.
		12	SOLAS ch. II-1 R45	earth fault on 220v and 440v
	13	ISM Code SOLAS 99/00 Amend /IX/R3	Corrective action taken on the ISM system by the Company is required within 3 monthsDeficiency(s) marked ISM is (are) objective evidence of a failure, or lack of Effectivenessof the implementation of the ISM CodeThe ship will be eligible for reinspection after 3 months from the final date of the report	
	26.04.2023	1	MLC 2006 Standard A4.3	The hobby room is the citadel according to the fire plan. The door to the hallway has therefore been changedA wooden door has been used for outer. Doors not according the A-division
		1	SOLAS CH.XI-1	ESP documentation is missing. Only the executive hull summary of the 2nd special survey could be shown.
	2	SOLAS CH.II-1	During the last repeated load tests, the accommodation ladders were not operationally tested with the specified designed load. As per initial test/delivery certificate dated 20 Jan 2011 the design load/test load equals 2.52 Ton. The load test (after 5y) dated 23-12-2015 was carried out with a reduced weight of only 330 kg. This incorrect test weight of 330 kg has again been used during the last 10y survey date 13 January 2021.	
	3	NOx TECHNICAL CODE CH. II	The EIAPP certificates, available on board, for all applicable diesel engines have not been issued by or on behalf of the current Flag state Administration (only certificates available on behalf of the Hong Kong Administration). As per Master statement, the R.O. is busy with issuing the certificates remotely. Needs to be	

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4	NOx Code / Chapter 6	Whenever there is a change of components and/or adjustable features of the engine that affect NOx emission levels , these changes shall be kept in a chronological order. For main engine and all auxiliaries on board , 1 entry could be ascertained dated 04/2022. Prior and after this date no records of components changes found. Master instructed to have the record of changes on all NOx influencing components for Main engine and auxiliaries updated.
5	SOLAS ch. V	The 2nd engineer on board Mr. Küçükali Besir, is in possession of an STCW III/3. As per minimum safe manning document, an STCW III/2 is required.
6	MLC 2006 Title 2	Refer to deficiency01209: Current 2nd engineer missing proper STCW licence. The current 3rd engineer on board (Mr. Akçeltik Onur) is in the possession of a proper STCW licence, however he is currently employed as 3rd engineer (with the applicable wages)
7	MLC 2006 Title 1	The chief engineer presently onboard has following limitations on his medical certificate and can therefore not be employed on current trading area of the vessel : -Only fit for near coastal waters -Not fit for solo watchkeeping
8	SOLAS ch. II-2	The isolation valve located amidships wich segregates the emergency fire pump from the fire main line is frozen/ rusted in open position and not closable by hand .
9	SOLAS ch. II	Steering gear no 2: abnormal noise noted when running the pump.
10	SOLAS ch. II	The engine room ventilator no 1, connected to the emergency switchboard: when starting the ventilator no 1 from within the emergency gen. set room, no load came on the emergency generator. When disconnecting the ventilator no 1 by use of its breaker, the indicator light came on when starting the ventilator no 1.
11	ICLL / ANNEX I / Reg. 14	The closing mechanism on e.g. maindeck access door to accomodation on PS ,skylight hatchway from steering gear room , ... are
12	MLC 2006 Title 3	Galley: some water taps are missing opening/closing cocks, floor is very dirty underneath e.g. the sinks, cabinets and cooking area. Leftovers of (old?) food noted on the floor in the previous mentioned area. Freezer (boxtype) with meat packed but no markings regarding content expiry date, ...?) The combination fridge: freezer with packed food without any marking, the fridge is storing food at a to high temperature. The installed thermometer is inoperative or out of its range.
13	SOLAS ch. V	Not any NAVTEX message plotted on the ECDIS, NAVTEX receiver setup on wrong stations , no inventory log maintained of received messages for the past route from the voyage from Chornomorsk towards port of Antwerp . Bridge team could not plot (demonstrate) any received message on the ECDIS. No proof that navigational hazards were taken into account during last voyage .
14	SOLAS ch. II	1) Cable penetrations though electric motors glands; poor, broken, excessive clearance, .... e.g. alternator on emergency generator, main fire pumps, main sea water cooling pumps, selector switch (local, remote aux. eng no 3, .... 2) Emergency air compressor: automatic drain is inoperative, the pressure gauges are malfunctioning. The equipment is not readily available (compressor not in 'auto' mode, valves are kept closed, emergency starting air bottle is not kept under pressure, ...)
15	MLC 2006 Title 3	Faucets on sinks (e.g. E.R. changing room, public toilet) loose, not fixed, broken.

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16	STCW Code Part A ch.I	<p>During the inspection crew was not able to demonstrate or show familiarisation with e.g.</p> <ul style="list-style-type: none"> <li>- ECDIS operation: plotting line of position demonstrate present zone of accuracy, guaranteed depth alongside</li> <li>- Properly resetting the quick closing valves (eg. emergency generator)</li> </ul> <p>Local manoeuvring of propulsion engine (including changing telegraph to local station)</p> <ul style="list-style-type: none"> <li>- No knowledge which pump is connected to the emergency bilge suction engine room.</li> </ul>
17	MLC 2006 Title 3	Moulded/rotten fresh vegetables stored in the fresh vegetables room
18	LSA Code CHAPTER V / 5.1	<p>The rescue boat's compass is stored in a separate wooden box. Drilled holes inside the rescue boat's frame next to release mechanism are suggesting these were from the original mounting place of the compass.</p> <p>The proper deployment / mounting of the radar deflector could not be demonstrated.</p> <p>On top of the rescue boat on port side, a plug is missing to prevent ingress of water.</p>
19	SOLAS ch. II-1	The engine room is, as per MSMD and Class Notation, an 'unmanned engine room', however 1) the automatic standby function of some pumps can not be maintained, as these pumps (in parallel configuration) have their in-and outlet butterfly constantly closed. No non-retur valves are provided in the piping (e.g. main sea water cooling) 2) following alarm noted: F.O. service tank 511 °C; Main air reservoir no. 1 at 511, 2 bar
20	SOLAS ch. VI	No agreed plan available in which the master and the terminal representative ensuring that the permissible forces and moments on the ship are not exceeded during loading or unloading, and shall include the sequence, quantity and rate of loading or unloading, taking into consideration the speed of loading or unloading, the number of pours and the deballasting or ballasting capability of the ship. the plan and any subsequent amendments thereto shall be lodged with the appropriate authority of the port State. At time of boarding by PSC, cargo operations had been started without mentioned agreed plan countersigned by the terminal representative.
21	SOLAS ch. II-2	The F.O. and MGO tanks, situated in the engine room, are all equipped with a sounding device in compliance with the regulations. Most of these sounding pipes have been 'bypassed' and are now equipped with a (non-approved) flexible hose, strapped against the original sounding pipes, that serves as the sounding pipe. It is also noted that on several of these configurations, no valve is installed. 2) The remotely operated valve installed in the fuel oil piping to the auxiliary engine no 2 did not close when activated remotely
22	MLC 2006 Title 4	Hazards identified wich might cause an occupational injury eg. Several mooning ropes are properly belayed on the desgnated mooring bolards but simply on the warp ends of the mooring winch. All safety pins from on the clutches to engage/disengage the mooring winches on forward and aft are not put in place. Hydraulic hoses connections on the provision crane mounted PS are detenorated / rusted,
23	SOLAS ch. II-1	Priming/vacuum systema, installed on the pumps connected to the engine room bilge pumping arrangements (main fire pompe), are found frozen, inoperative when tested
24	SOLAS ch. II-2	Loose floor plates in engine room, e.g. purifier room, auxiliary engines area, lower platform, ...-

<b>ANTWERPEN</b>	<b>31.07.2024</b>	25	MLC 2006 Title 4	On several places found contamination by oil and/or fuel oil: e.g. below the auxiliary engines, purifier room, ...
		26	ICLL 2003 Amend / ANNEX I / Reg. 20	Several soundings pipes as F.O, drain tank, stem tube, F.O. overflow tank, L.O. drain tank, ...etc. do not fully or don't close at all: on several sounding pipes, the counterweights are missing and on others the counterweights have been adjusted to keep the sounding pipes open at all times. On the deck area closing caps can not be closed properly, i.e. up to its end. Some could only be screwed down by a quarter of a tum.
		27	MARPOL Annex V	Incorrect onboard garbage segregation, In the galley, the dedicated storage facilities as per the garbage management plan are not adhered to 0.0 Receptacles dedicated for food waste are containing plastic, carton, etc Receptacles dedicated for domestic waste are containing food, glans, etc This objective evidence might ascertain improper garbage disposal record keeping
		28	SOLAS ch. II-2	Both main fire pumps are not ready for immediate use: valves attached to the fire pumps are kept closed. Fire pumps, however, can be remotely started.
		29	SOLAS ch. XII	The manometer installed on the ejector line located in the bosun store forward to indicate it's suction pressure on the water ingress system, is defective.
		30	ICLL 03 Amend / B / I / II / Reg. 18	The manhole to the sterntube tank was not bolted down.
	31	ISM Code – SOLAS Chapter IX / Reg. 3	Safety management audit by the Administration is required before departure of the ship. Deficiency(s) marked ISM is (are) objective evidence of a serious failure, or lack of effectiveness, of implementation of the ISM Code.	
	<b>29.01.2025</b>	1	NOx Code / Chapter 2	Original technical file for ME could not be located during the inspection. IMO number as indicated in the technical file should be recorded whenever relevant parts are changed in the Engine (e.g. fuel nozzle exchanged on ME 28/11/24 were not properly recorded).
		2	STCW Code Part A ch.VIII	The current table of shipboarded working arrangements does not cover for a lookout on the bridge (when required) for the following periods: from 1200 till 1300 and from 1700 till 2000.

<b>GENT</b>	<b>15.07.2022</b>	1	SOLAS ch. II-1 R.43	Emergency generator reported out of order upon arrival. Shore service engineer ordered. During the inspection repairs were still ongoing. Prior departure the proper functioning of the emergency generator is to be confirmed to PSC Belgium by the attending class surveyor.
		2	BWM Con. R.B-2,5	Not each operation concerning Ballast Water is fully recorded without delay in the Ballast Water record book, e.g. in ports and during exchange of ballast water at sea, only 1 entry is made for all separate ballast operations conducted. Master instructed to comply with the Ballast Water Management from today, 2022-07-15.
		3	MARPOL Annex IV ch.2-2.1	The onboard available Engine International Air Pollution Certificates have not been issued on behalf of current Flag Administration.
		4	SOLAS C V R 23	Pilot ladder on deck. lower rubber step is damaged, manila rope in poor condition.
		5	SOLAS ch. II-2 R.4.2	Quick closing valve on e.g. Main engine storage tank (at SB) blocked when tested. Prior departure proper functionality of all quick closing valves in engine room to be confirmed by the attending Class surveyor.
	<b>22.09.2023</b>	1	MLC/STD. A2.2	Seafarers are not given their monthly account of payments due and amounts paid, including wages and additional payments. Seafarers are only given the general payroll stating the wage information of the other crewmembers as well.
		2	SOLAS/CH.-2/R.4.2.2.5.5	Means of isolating the fuel supply and spill piping to individual auxiliary engines in accordance with SOLAS II-2 4.2.2.5.5 and MSC.1 Circ 1321 are not available. Manually operated valves are present to shut off the fuel supply and spill lines however these are located in the direct vicinity of the engine and thus not satisfying the distance criterion of chapter 4, paragraph 2 of aforementioned circular. At the time of inspection, shipowner was consulting with flagstate.
	<b>04.04.2024</b>	1	SOLAS CH. V	S-band radar not working properly. Picture quality in confined waters (e.g. channel from Ghent to Terneuzen) is very bad. Radar scanners (X- and S-band) are not installed clear of obstructions (just in front of top mast) resulting in false echoes. Carried out alterations in the past are clearly not sufficient and efficient. To be investigated properly and dealt with asap since this is a recurrent deficiency since 2018!
		2	MLC 2022	Safety stoppers not applied on both sides on open cargo hatch covers.
		3	MLC 2006	Several mooring lines under tension are kept on the capstans instead of on the dedicated mooring bits.
		4	MLC 2006	Seafarers are not given a monthly account of the payments due and the amounts paid, including wages, additional payments and the rate of exchange used where payment has been made in a currency or at a rate different from the one
		5	ISM CODE SOLAS AMED/IX/REG.3	Corrective action taken on the ISM system by the Company is required within 3 months. Deficiency(s) marked ISM is (are) objective evidence of a failure, or lack of effectiveness, of the implementation of the ISM Code. The ship will be eligible for re-inspection after 3 months from the final date of the report.
		6	SOLAS CH.III	In the case of a lifeboat arranged for free-fall launching, at least once every three months during an abandon ship drill the crew shall board the lifeboat, properly secure themselves in their seats and commence launch procedures up to but not including the actual release of the lifeboat (i.e., the release hook shall not be released). The lifeboat shall then either be free-fall launched with only the required operating crew on board, or lowered into the water by means of the secondary means of launching with or without the operating crew on board. In both cases the lifeboat shall thereafter be

				manoeuvred in the water by the operating crew. At intervals of not more than six months, the liteboat shall either be launched by free-fall with only the operating crew on board, or simulated launching shall be carried out in accordance with the guidelines developed by the Organization*. The last time that this drill was performed was on 1November 2023.
<b>GENT</b>		7	SOLAS CH. VI.	Before the solid bulk cargo is loaded or unloaded, the master and the terminal representative did not agree on plan which shall ensure that the permissible forces and moments on the ship are not exceeded during loading or unloading, and shall include the sequence, quantity and rate of loading or unloading, taking into consideration the speed of loading or unloading, the number of pours and the de-ballasting or ballasting capability of the ship. The plan and any subsequent amendments thereto were not lodged with the appropriate authority of the port State.
	<b>17.09.2024</b>	1	SOLAS CH. V	S-band radar not working properly. Picture quality in confined waters (eg. channel from Ghent to Ternouzen) is very bad Radar scanners (X- and S-band) are not installed clear of obstructions just in front of top mast) resulting in false echoes Carried out alterations in the past are clearly not sufficient and efficient. To be investigated properly and dealt with asap since this is a recurrent deficiency since 2018!
		2	ICLL	Serious corrosion and pitting observed all over the hull of the ship
		3	STCW CODE	The emergency bilge suction valve in the engine room bilge area was stuck and could not be opened by hand without the use of an extension rod.
		4	STCW CODE	No evidence found of integration of applicable NAVTEX data, temporary and/or preliminary notices, into the ECDIS voyage plan.
<b>WILLEBROEK</b>	<b>09.08.2022</b>	1	BWM Conv. R.D-2	Forward ballast water treatment system (fore peak and 21C tanks) sensor in alarm and not properly working.