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CIRCULAR

Belize – Attributing PSC Detentions to ROs

C25028 | 29 May 2025

Notice to: Surveyors / Auditors

The International Merchant Marine Registry of Belize (IMMARBE) has issued Merchant Marine Notice [MMN-25-005](#), which specifies the circumstances under which detentions will be attributed to Recognized Organizations (ROs) acting on behalf of IMMARBE.

Points to Note:

Circumstances for the attribution of detentions to ROs

The Notice advises that detentions will be attributed to the RO under the following circumstances:

Statutory Certification Failures

Detentions will be attributed to the RO if statutory certificates were not issued/endorsed by the RO, unless the Belize Registry received prior written notification from the RO that the survey was not conducted, or certificates would not be issued. Examples include:

- where a vessel is detained for lacking a valid Statutory Certificate and the RO failed to notify the Registry that the certificate was refused due to unresolved deficiencies, or
- a Load Line Certificate is issued without verifying watertight door operability, leading to a detention for defective doors.

Detentions resulting from a failure to implement the IMMARBE Occasional Survey Programme

ROs are to ensure that any vessel included in the Occasional Survey Programme is inspected every six (6) months. Any detention where it is noted that the occasional survey was not completed by the due date, without any notification given to IMMARBE, will be attributed to the RO due to non-compliance with flag requirements.

Detentions within 90 days of a RO Survey

Detentions will be attributed to the RO if the vessel is detained within 90 days of surveys performed by the RO, and it is concluded that the RO did not exercise due professionalism and skill in conducting the survey/audit. Examples of deficiencies that Flag will consider for attributing the detention to the RO include:

- Equipment deficiencies (missing or improperly maintained).
- Serious wastage or structural defects missed during recent Statutory Surveys.
- Failure to systematically implement ISM Code requirements.
- Missing or expired items with no RO notation during recent surveys.
- No evidence of maintenance records for critical machinery, despite the RO issuing a DOC/SMC audit 90 days prior.
- Items being unchecked during the RO's annual survey, e.g. fire extinguishers with expired hydrostatic tests (5+ years overdue) found during PSC Inspections.

Circumstances when a detention may not be attributed to a RO

The Notice also advises that detentions may not be attributed to the RO under the following circumstances:

Operational failures:

- Deficiencies arising from crew negligence (e.g. improper use of equipment, failure to follow procedures).
- Lack of crew training or drills (e.g., unconduted fire drills, mishandling of safety systems).

Documentation Issues Unrelated to Surveys

- Missing or expired crew certificates, which could not be verified during surveys, audits (e.g. STCW endorsements, medical fitness certificates).
- Inaccurate or outdated ship records (e.g., garbage record books, oil record books) unless linked to RO certification.

Temporary or Emergency Conditions

- Breakdowns or malfunctions occurring after the last RO survey (e.g., engine failure, sudden electrical faults).
- Emergency repairs or temporary fixes pending completion (if documented and justified).

Third-Party or External Factors

- Cargo-related issues (e.g., improper stowage, shifting cargo) unless tied to structural defects overlooked by the RO.
- Delays in spare parts delivery or external servicing (e.g., awaiting replacement lifeboat parts).

Flag-State Specific Requirements

Non-compliance with Belize-specific regulations not covered by RO statutory surveys (e.g., administrative reporting failures).

Punitive Measures

ROs with significant attribution of detentions may be targeted for withdrawal of recognition under the following criteria:

- ROs with the highest number of PSC detentions attributed to them;
- ROs with significant deficiencies identified during Flag or Port State inspections;
- ROs with overall poor performance in Administration reviews and MoU annual reports.

The Administration may impose the following enforcement actions on underperforming or targeted ROs, in lieu of automatic withdrawal of recognition:

- Increased FSI on vessels certified by targeted ROs;
- Enhanced RO audits for compliance with IMO Resolutions MSC.349(92) and MEPC.237(65) RO Code and IMMARBE Agreement concerning delegation of authority;
- Restrictions on the delegation of authority granted by the Administration to conduct Statutory Services.
- Any other measures the Administration may consider necessary in the circumstances.

Act now

Surveyors / Auditors are to take note of the contents of the Maritime Notice and be guided accordingly.