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# Belize – Handling PSC Inspections and Detentions

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### Notice to: Ship Owners/ Managers/ Operators / Surveyors

The International Merchant Marine Registry of Belize (IMMARBE) has issued Merchant Marine Notice [MMN-25-006](#), which details procedures for handling PSC inspections and detentions.

The Notice reminds that the Belize Administration is to be notified immediately after every PSC inspection. For vessels not detained, the notification is to include:

- A copy of the PSC Report Form A and Form B;
- Rectification Report (TDF-020\_ for each deficiency;
- Root Cause Analysis and Preventive Actions;
- Evidence of the rectification of each deficiency (including photographs).

In cases of PSC detentions, the Operator must:

- notify IMMARBE without delay, and e-mail the PSC Report Form A and B to [inspections@immarbe.com](mailto:inspections@immarbe.com);
- Arrange for RO attendance to verify the rectification of the deficiencies.

The RO must carry out a comprehensive inspection of the vessel to identify any other deficiencies not mentioned in the PSC report.

### Points to Note:

#### ISM Code Verification

Where deficiencies are related to the ISM Code, the RO responsible for ISM must perform an additional SMS audit onboard. The Administration may also require an additional audit of the company's DOC within thirty days if there are five or more ISM-related deficiencies.

#### Survey Requirements

If the detention occurred within the +/- 3 month window of the annual survey, the RO must conduct the annual survey at the port of detention. Should the surveys be impractical due to extenuating circumstances at the detention port, the

RO must notify IMMARBE and provide a detailed schedule for their completion at the next port of call. However, Safety Equipment and Radio Surveys must be completed at the detention port.

### **Certificate Downgrades and Dispensation**

Where deficiencies affect the validity of certificates and cannot be rectified immediately, the RO is to contact the flag, proposing temporary arrangements and providing supporting documents. The RO will then be granted authorization to downgrade the relevant certificate to a short-term one. The vessel is to be issued a dispensation letter via its designated office per MMN-24-003.

### **Responsibility**

#### **Operators/Owners are:**

- to immediately notify the Administration of PSC inspections and detentions, and submit the required documents;
- if disputing detentions, to instruct the Master to appeal with the PSC authority, then escalate to the RO and IMMARBE if needed;
- to apply, via their designated office, for dispensation letters per MMN-24-003 if deficiencies cannot be rectified at the detention port;
- financially responsible for all costs related to inspections, surveys, audits, fines, or detentions.

#### **ROs are to:**

- attend the vessel at the detention port to confirm rectification of deficiencies and conduct a general inspection;
- perform annual surveys if the detention falls outside the +/- 3 month window for mandatory surveys;
- notify IMMARBE if surveys cannot be completed, and provide a completion schedule;
- conduct an additional SMC audit if ISM deficiencies are recorded and conduct a DOC audit of the company if five or more such deficiencies are recorded;
- downgrade affected certificates to short-term, after obtaining Flag Administration approval;
- advise operators to apply for a dispensation letter when a short-term certificate is required;
- submit all required documents for PSC inspection and detention as required.

### **Escalation measures for repeated detentions**

The following measures will be taken by the Administration in case of first, second and third detention within 36 months. Detentions linked to critical safety failures may trigger immediate escalation, regardless of timeframes:

#### **First Detention**

The vessel will be issued with a warning letter and enrolled in an Occasional Survey Program (OSP) for 24 months per IMMARBE Policy TD-IMM-GOB001-25.

#### **Second Detention**

- A vessel detained twice within 18 months is deemed substandard and will be summarily deleted from the registry.
- A vessel detained a second time between 18 and 24 months from the first detention shall be fined USD 5,000 for minor deficiencies, escalating to USD 10,000 for major or repeated violations. A DOC audit is to be conducted within 30 days.

#### **Third Detention**

A vessel detained three times within 36 months, irrespective of the PSC MoU region, shall be deleted from the Belize Registry without further notice.

### **Process for Deletion**

- Deletion takes effect within 20 days from the date of issuance of the notice of deletion, or at the next port of call, whichever is earlier.
- Immediate deletion may be applied for detentions involving critical safety failures, falsification of documents, sanction violations, repeated ISM non-conformities, or threats to the crew's safety.

- For immediate cancellation, the Flag State may issue a Prohibition of Sailing Notice (PSN) together with the Notice of Cancellation. A copy is provided to the Authorities at the detention port.
- Every vessel being deleted is monitored to ensure that ships do not circumvent the above conditions.

#### **Appeals against PSC Detentions**

- If the Ship Owner/Operator believes the detention is unjustified, the Master must immediately submit an appeal to the PSC authority at the detention port, with copies to the Administration and the RO. The appeal is to follow the procedures given on the relevant PSC MoU website.
- The Master must request a written acknowledgement of the appeal from the PSC office.
- Within 14 days from the detention, the RO is to review the PSC detention report and provide comments on the deficiencies found and grounds for appeal.
- The Flag should be provided with:
  - Logs, certificates, photographs, and correspondence with the PSC;
  - A detailed statement explaining why the detention is unjustified;
  - The position of the RO on the appeal;
  - Any other relevant documentation or evidence.

#### **Financial Incentive**

The Belize Administration offers a financial incentive for vessels that achieve high performance during PSC inspections. These incentives apply to vessels with at least one PSC inspection during the period under consideration.

Owners/Operators of vessels inspected by PSC with no more than six deficiencies in a single Inspection within 12 months may be eligible for a reduction on the vessel's next annual taxes. Vessels with no more than six deficiencies in a single inspection within 24 months may be eligible for a higher reduction in the taxes. The incentive applies only once per vessel for either one or two consecutive calendar years within an annual tax period.

To claim the reduction, the owner/operator must submit a formal request through their designated Deputy Registrar when applying for the annual tax payment. The request must include a summary of PSC Inspection for the relevant period, along with copies of the PSC reports, including those with zero deficiencies.

#### **Mandatory Reporting of Ship Damage**

To ensure compliance and avoid potential detention, operators must notify the Flag State, Port State, RO, and Port Authority of any accidental damage to the ship.

Typically, a ship won't be detained if:

- The Flag Administration or RO responsible for the relevant certificate is promptly notified.
- The Master, or Company, provide the Port State Authority with full details of the incident, damage incurred, and confirmation of Flag State Notification before entering the port.
- The ship undertakes remedial action to the satisfaction of the Port State Authority.
- On completion of the remedial action, the Port State Authority confirms that any deficiencies posing a clear hazard to safety, health, or the environment have been rectified.

#### **Penalties for Non-compliance**

- An Owner/Operator who fails to notify IMMARBE or the RO immediately of a PSC inspection or detention – USD 1,000
- Failure to notify Flag State, Port State, RO and Port Authority of any accidental damage to the ship leading to detention – USD 5,000

#### **Act now**

Ship Owners/ Managers/ Operators/ Surveyors are to take note of the contents of the Merchant Marine Notice and be guided accordingly.