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CIRCULAR

San Marino - Increased Port State Control Attention

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Notice to: Ship Owners / Managers / Operators / Masters

San Marino Ship Register (SMSR) issued [Marine Notice SMMN – 2026-TEC-008](#) dated 17 September 2026, concerning Increased Port State Control Attention.

The Notice establishes a risk-based approach to strengthen PSC performance, prevent deficiencies and detentions, and enhance monitoring of ships requiring increased Flag State attention. It also highlights the shared responsibility of Shipowners, ISM Companies, Masters, crews, Recognised Organisations (ROs) and the Flag Administration in maintaining continuous compliance.

1. RISK ASSESSMENT AND IDENTIFICATION OF HIGH-RISK SHIP

High-Risk Ship: A San Marino flagged ship which, on the basis of its PSC history and/or other compliance indicators, is assessed by the San Marino Maritime Authority as requiring enhanced Flag State monitoring. Indicators may include repeated deficiencies, a detention, serious or recurring deficiencies, poor Flag State Inspection outcomes, major ISM non-conformities, repeated equipment failures, or other evidence of elevated compliance risk.

The San Marino Maritime Authority applies a risk-based approach to identify ships requiring enhanced Flag State monitoring. The following may be taken into consideration:

- PSC detention history and the number, nature and recurrence of PSC deficiencies;
- deficiencies related to fire safety, life-saving appliances, safety of navigation, propulsion or steering, pollution prevention, watertight/weathertight integrity, ISM, MLC or other safety-critical matters;
- Flag State Inspection results and evidence of repeated findings;
- performance of the ISM Company and the effectiveness of corrective and preventive actions;
- performance of the ship's RO and any attribution of RO responsibility by a PSC authority;
- the ship's age, type, trading pattern and operational profile;

- casualties, incidents, breakdowns or repeated requests for exemptions, dispensations or conditional authorisations;
- any other information that, in the opinion of the Administration, indicates increased compliance risk.

2. MEASURES APPLICABLE TO HIGH-RISK SHIPS

Where a ship is identified as a High-Risk Ship, the San Marino Maritime Authority may apply enhanced monitoring measures, including increased frequency and/or scope of Flag State Inspections, as appropriate to the identified risk.

These measures may include:

- an additional or expanded Flag State Inspection;
- attendance by a Flag State Inspector during a statutory survey or audit performed by the RO;
- an additional statutory survey by the RO where justified by the nature of the deficiencies or by applicable convention requirements;
- an additional ISM verification or focused review of the shipboard Safety Management System and, where appropriate, the shore-based management system;
- submission of a corrective and preventive action plan with objective evidence of closure;
- enhanced monitoring of open recommendations, conditions of class, statutory conditions, memoranda or outstanding deficiencies;
- a review of the suitability of the current RO/class arrangements where performance indicates a concern falling within the scope of SMMAR – 2026-TEC-001_Rev01 and SMMAR – 2025-TEC-029_Rev01;
- any other proportionate measure considered necessary by the Administration to restore and demonstrate satisfactory compliance.

3. RECOMMENDED PRE-ARRIVAL PSC SELF-ASSESSMENT

Before arrival at a port where a Port State Control (PSC) inspection may reasonably be expected, particularly in major PSC regimes such as Paris MoU, Tokyo MoU, USCG, AMSA and China MSA, Owners, Managers and Masters are strongly recommended to conduct a structured self-assessment of the ship's condition and compliance.

SMSR Form 21 – PSC Pre-Arrival Self-Assessment Checklist, provided in Annex 5 of Marine Notice SMMN – 2026-TEC-008, may be used as a practical tool for this purpose.

Any deficiency identified during the self-assessment should be evaluated and, where possible, rectified before arrival. Where immediate rectification is not possible, the risk should be evaluated and the relevant corrective action and notifications made as applicable.

The self-assessment is recommended and is not required to be submitted to the Administration unless specifically requested. It does not replace the ship's SMS, the Master's responsibilities, RO surveys or Flag State Inspections.

For guidance on the assessment of Recognised Organisation (RO) responsibility for PSC deficiencies, reference should be made to Annex 2 – Tokyo MoU: Reference Notes on Attribution of Recognised Organisation Responsibility and Annex 3 – Paris MoU: Reference Notes on Assessment of Recognised Organisation Responsibility of Marine Notice SMMN – 2026-TEC-008.

4. MAINTENANCE OF CONDITIONS AND DEFECT REPORTING

Following any statutory survey, the condition of the ship and its equipment is to be maintained in conformity with the applicable convention requirements.

Where an accident occurs or a defect is identified that affects:

- the safety of the ship;
- the efficiency or completeness of essential equipment;
- pollution prevention arrangements; or

- statutory compliance,

the Master/Company shall report the matter at the earliest opportunity to the San Marino Maritime Authority and to the RO responsible for the relevant statutory certification, as applicable.

Where the ship is in, or proceeding to, a foreign port, and the matter is subject to notification under an applicable convention or may affect safe operation, the appropriate Port State Authority shall also be informed as required.

5. CORRECTIVE, PREVENTIVE AND FOLLOW-UP MEASURES AFTER PSC

Following a PSC inspection resulting in deficiencies, the Company and Master shall ensure that all deficiencies are rectified within the action code and time limit specified by the PSCO.

In cases of detention, serious or repeated deficiencies, ISM-related deficiencies, or when requested by the Administration, the following documentation shall be made available to the San Marino Maritime Authority without undue delay:

- the complete PSC inspection report and detention notice, where applicable;
- a corrective and preventive action plan addressing each deficiency and its root cause, where appropriate;
- objective evidence of rectification, including photographs, service reports, test records, invoices, log-book entries or RO attendance reports, as relevant;
- copies of any conditional certificate, short-term certificate, dispensation, exemption or authorization issued in connection with the deficiencies;
- any RO report, additional survey report or ISM verification report related to the PSC findings;
- the completed deficiency closure report in Annex 1, when requested by the Administration.

The ship shall maintain an onboard PSC Compliance File in accordance with Annex 4. For further details on the required contents of the PSC Compliance File, reference should be made to Annex 4 – PSC Notification and Onboard Compliance File of San Marino Marine Notice SMMN – 2026-TEC-008.

Corrective actions should address both the identified deficiency and, where appropriate, its root cause and measures to prevent recurrence.

Where a PSC deficiency is attributed to RO responsibility, the San Marino Maritime Authority may review the relevant statutory survey or audit and take appropriate oversight action.

6. SHIPS BELOW 500 GT – INCREASED PSC ATTENTION

The provisions of this Circular also apply to San Marino-flagged ships below 500 GT. These vessels are receiving increased PSC attention and therefore require effective technical management, maintenance and operational preparedness.

Particular attention should be given to:

- fire safety and fire-fighting equipment;
- life-saving appliances;
- emergency preparedness;
- navigation equipment and procedures;
- pollution-prevention arrangements;
- machinery maintenance;
- statutory and operational documentation;
- crew certification and familiarization;
- maintenance records and safety management procedures.

Owners and Operators are strongly encouraged to maintain effective and continuous technical oversight and to identify and rectify deficiencies before arrival at ports where PSC inspections may be expected.

Companies should also consider enhanced internal inspections, pre-arrival PSC checks and more frequent technical verification for ships with previous deficiencies, detention history or repeated safety-critical findings. Masters should be provided with the necessary support, resources and authority to ensure timely rectification of deficiencies.

Particular attention should be given to:

- preventive maintenance;
- condition and readiness of safety equipment;
- validity and consistency of statutory documentation;
- crew competence and familiarization;
- effective implementation of shipboard procedures;
- closure of previously identified deficiencies; and
- preparation for Port State Control inspections.

7. FLAG NOTIFICATION

The Flag Administration shall be notified immediately in the following cases:

- Any PSC detention of a San Marino flagged ship;
- Any PSC inspection resulting in a serious deficiency affecting safety, security, pollution prevention, labour conditions or seaworthiness;
- Any deficiency requiring rectification before departure, a conditional certificate, dispensation or special authorisation;
- Any repeated deficiency suggesting ineffective corrective action or a systemic ISM issue;
- Any allegation or finding that may involve RO responsibility.

8. PSC FOLLOW-UP AND ESCALATION

For the detailed steps to be followed after a PSC inspection, including notification, rectification, evidence of closure, root cause and preventive actions, RO/Flag attendance and escalation criteria, reference should be made to Annex 6 – PSC Follow-Up and Escalation Flow of San Marino Marine Notice SMMN – 2026-TEC-008.

Act now

Ship Owners / Managers / Operators / Masters are encouraged to review the requirements of this circular, assess the ship's PSC readiness and address any outstanding deficiencies before arrival at a port where PSC inspection may be expected. Particular attention should be given to maintenance, statutory compliance, crew familiarization and the availability of supporting records and evidence.