

CIRCULAR LETTER No. 5/21

of MANAGEMENT BOARD OF POLSKI REJESTR STATKÓW S.A.

dated 30 June 2021

on measures to minimize the number of detentions by Port State Control of PRS
classed/certified vessels.

The following is communicated and is to be followed:

In order to ensure the adequate standards of safety of ships classed/certified by Polish Register of Shipping (PRS), as well as to provide support to the flag State Administrations and International Organizations in their endeavors to continuously maintain the quality of international shipping, the Board of Polish Register of Shipping implements, on 28th of June 2021, an updated policy for proceeding with ships detained by Port State Control (PSC) and their Owners, with special regard given to the vessels being subject to multiple detentions.

The updated policy involves mainly an extended scope and increased number of PRS' surveys of such ships.

Principles of the policy, given below, should be treated as general guidelines. Actual scope of PRS' proceeding will depend on the character of the deficiencies being grounds for detention. In all cases special requirements of flag State Administrations will be taken into account in detail.

1. The first detention of the ship within 24 months period.

PRS reserves the right to attend the vessel, even if the visit is not required by other Authorities and regardless if the deficiencies being grounds for detention refer to scope of PRS' surveys.

In such case, during the visit, the surveyor/auditor/inspector will verify the rectification of the deficiencies and, additionally, the ship may be subjected to an extended survey, within the scope specified by PRS Head Office. If PRS issues the Safety Management Certificate (SMC) for the ship, the ship may be subjected to the additional ISM audit. After such visit the additional survey/audit/inspection may be required if the circumstances require.

Appropriate IO shall be issued to the vessel's status, by which the Shipowner will be obliged to inform PRS not only about any case of detention by PSC, but also about each PSC inspection, which took place and to provide the report of inspection for PRS' consideration. In case there are any deficiencies, which in opinion of PRS require attendance, the vessel will have to be submitted for additional survey.

2. The second detention of the ship within 24 months period.

PRS surveyor/auditor/inspector's visit will be required, even if it is not required by other Authorities.

During this visit, after verifying the rectification of the deficiencies, the ship will be subjected to an extended survey, within the scope of at least annual survey. Actual scope of the survey may be extended by PRS Head Office or by surveyor/auditor/inspector on board after

acquaintance with the actual technical condition of the vessel. In case PRS issues the vessel with SMC, additional ISM audit in scope as deemed by the auditor or Head Office will be carried out. If PRS issues a Document of Compliance (DOC) to the Owner's Company, an additional ISM audit of the Company's Office in scope of an annual will be performed. In case if any deficiencies are in scope of MLC Convention, additional MLC inspection may be carried out to address the MLC issues and verify that the full compliance has been restored. After such visit the additional survey/audit/inspection may be required if the circumstances require. The results of the a/m survey and/or audit will be revised by PRS Classification Committee.

Failure to comply with the survey/audit/inspection as above, unsatisfactory review of the additional survey or audit after detention, or if measures taken by the Owner in order to prevent another detention will be considered by PRS as insufficient, which may lead to subsequent detention, PRS will consider the necessity to take further steps against the ship and Shipowner, such as suspension and invalidation of certificates or withdrawal from class.

Appropriate IO will be issued to the vessel's status, by which the Shipowner will be obliged to inform PRS not only about any case of detention by PSC, but also about each PSC inspection which took place and to provide the report of inspection for PRS' consideration. In case there are any deficiencies, which in opinion of PRS require attendance, the vessel will have to be submitted for additional survey/audit/inspection. Additional measures may be taken to help the Shipowner and the vessel to improve compliance with the regulations of applicable conventions. This measure may include implementation of regime of additional surveys/audits every three or every six months. Results of such surveys/audits will be evaluated and may be the basis of invalidation of certificates and withdrawal from class, in case if the condition, maintenance and management of the vessel is observed worsening. Close cooperation of the Shipowner with PRS is expected and appreciated at all stages.

3. The third detention of the ship within 24 months or second detention within 12 months period.

The ship may be subject to invalidation of certificates and withdrawal from class. Final decision will be taken by PRS Classification Committee. If the Committee decides to maintain ship's Class, then measures described in Para. 2 apply

4. The Circular letter No.4/19 dated 12 March 2019 on measures to minimize the number of detentions by Port State Control of PRS classed/certified vessels becomes obsolete.
5. The Circular letter enters into force on the date of signing.

Management Board
of Polski Rejestr Statków S.A.

For the Management Board
Dariusz Rudziński, Member of the Board

Distribution list: 4

Note: Signature of the approving person is in the directive original kept in BO.