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**Konu** : EQUASIS Bilgi Sistemlerinde Liman Devleti Kontrol Denetimleri ile İlgili Dublikasyon Veri Girişi Hk.

**SİRKÜLER NO: 583/ 2019**

**İlgi** : Uluslararası Deniz Ticaret Odası (ICS)'nin 14 Ağustos 2019 tarihli ve SPC(19)19 sayılı yazısı

Uluslararası Deniz Ticaret Odası (ICS) tarafından gönderilen ilgi yazıda; EQUASIS ve Uluslararası Denizcilik Örgütü (IMO) Küresel Entegre Deniz Taşımacılığı Bilgi Sistemi (GISIS) gibi, Liman Devleti Kontrolü (PSC) bilgi sistemleri tarafından dağıtılan bazı Liman Devleti Kontrolü (PSC) denetim verilerinin birden fazla Memorandumda girişinin yapılması neticesinde dublikasyona yol açtığı bu sebeple söz konusu denetime tabi tutulan gemilerin kalite ve performans görünümüne olumsuz etki yarattığı bildirilmektedir.

Ülkelerin Liman Devleti Kontrolü kapsamında oluşturulan denetim verilerinin, geminin diğer memorandumlar kapsamındaki ülkelere girişlerinde denetlenme için hedef haline getirebileceği gibi, ticari faaliyetlerini de etkilediği belirtilmektedir.

Birden fazla memorandumun üyesi olan ülkelerin PSC denetim verilerinin dublikasyon olarak girişi sebebiyle örneğin aynı tarih ve yerde denetime tabi olarak tutulan bir geminin, farklı memorandumlarda görüntülediği ve böylelikle farklı iki noktada tutulmuş gibi görüldüğü ifade edilmektedir.

GISIS ve EQUASIS sistemlerindeki veri dublikasyonu sorununun, daha çok ticari amaçlarla kullanılması sebebiyle EQUASIS veri tabanında birincil öncelik taşıdığı, 2018 yılının Eylül ayına kadar EQUASIS sisteminde 7000 kadar dublikasyon veri girişi tespit edildiği, en kısa sürede bir çözüm bulunmazsa bu durumun EQUASIS'in güvenilir bir bilgi kaynağı olarak kalmasını zorlaştıracığı belirtilmektedir.

ICS tarafından sorunun çözümüne yönelik IMO ve EQUASIS nezdinde yapılan görüşmelerde, sorunun PSC Bilgi Sistemlerine (GISIS ve EQUASIS) giriş yapan yetkililerden kaynaklandığı, kendileri tarafından veri girişi yapan kişinin yetkisine müdahale edilemediği ifade edilmektedir.

Ekte sunulan detaylı bilgi ve yukarıda bahsi geçen konular kapsamında 9 Eylül 2019 tarihinde gerçekleştirilecek ICS Denizcilik Politikaları Komitesi toplantısında Odamız görüşlerine esas teşkil etmek üzere varsa görüş ve önerilerinizin 6 Eylül 2019 tarihi mesai bitimine kadar Odamıza ([serkan.inal@denizticaretodasi.org.tr](mailto:serkan.inal@denizticaretodasi.org.tr)) iletilmesi hususunda bilgilerinizi ve gereğini arz/rica ederim.

Saygılarımla,

**İsmet SALİHOĞLU**  
Genel Sekreter

**Ek:** İlgi ve Ekleri (7 sayfa)

**DAĞITIM:****Gereği:**

- Tüm Üyelerimiz (Web Sayfasında ve e-posta ile)
- Türk Armatörler Birliği
- S.S. Gemi Armatörleri Mot. Taş. Koop.

**Bilgi:**

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- Deniz ve İçsular Düzenleme Genel Müdürlüğü
- Meclis Başkanlık Divanı



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14 August 2019

SPC(19)19

**TO: SHIPPING POLICY COMMITTEE**

**Copy: MARINE COMMITTEE  
ALL FULL AND ASSOCIATE MEMBERS (For Information)**

**EQUASIS INFORMATION SYSTEM - DUPLICATE ENTRIES OF NATIONAL PORT STATE CONTROL (PSC) INSPECTION DATA**

**Action required: To note that an issue has been identified regarding duplication of some Port State Control (PSC) inspection data disseminated by PSC information systems, such as EQUASIS and IMO's GISIS, leading to misrepresentation of the overall quality/performance of a particular ship. Based on this information, ICS national associations are requested to consult with their respective member companies and provide comments on this issue to the Secretariat as soon as possible ([helio.vicente@ics-shipping.org](mailto:helio.vicente@ics-shipping.org)), with a view to further discussion during the upcoming SPC meeting on 9 September 2019.**

As members will be aware, Port State Control (PSC) information systems, such as EQUASIS and IMO's GISIS, disseminate PSC inspection data to provide a global overview of the world merchant fleet's performance and to help improve the safety and quality of ships.

This inspection data, which is provided by national PSC authorities to regional PSC regimes (e.g. Paris MoU) for inclusion on databases of PSC information systems can be used, inter alia, for enforcement purposes (e.g. to target ships for inspection) and for various commercial purposes (e.g. by charterers).

In this respect, it has been determined that in cases where national PSC authorities are members of two or more regional PSC regimes, the entries of a single PSC inspection may be duplicated on the databases of PSC information systems (i.e. inserted more than once as separate entries), since the data is received from more than one regional PSC regime.

An example of such cases include the 'Venture Luck' (IMO No. 9670743, date: 25/8/2017). The data was reported by two or more PSC regimes for the same ship, on the same date, and was listed separately on the EQUASIS and GISIS databases. As if they were two different detentions.

More concerning, in some cases (for unknown reasons) data related to the same inspection of the same ship is provided to EQUASIS and GISIS by different PSC regimes with different dates, even though they are clearly the same case (e.g. the 'PROSPEROUS', IMO No. 9591741, dates: 13/2/2017 and 14/2/2017). In such cases not

only was the data for the same inspection and ship listed separately in EQUASIS, but the individual average (%) of ship inspections leading to a detention (in the last 36 months) is also counted as two detentions. Thus misrepresenting the overall performance of the ship.

While the problem is with both GISIS and EQUASIS, the latter is a bigger concern since (unlike GISIS), it is more likely to be used for commercial purposes, e.g. by Charterers. According to Equasis, up until September 2018, there were a total number of 7,000 known cases of duplication, averaging 14,000 reports, which clearly undermines the credibility of Equasis as a trusted data source, unless a solution is reached as soon as possible.

This duplication issue has been extensively discussed in recent meetings of the EQUASIS Editorial Board, where ICS (supported by other industry representatives), continues to lead industry calls for a prompt permanent solution. However, the role of EQUASIS is limited to presenting the data it receives, not to interpret it or make assumptions about it. Therefore, finding a solution requires a joint effort between the regional PSC regimes, EQUASIS and national PSC authorities, especially those that currently submit data to more than one regional PSC regime.

In this respect, ICS in co-operation with a number of industry co-sponsors (BIMCO, INTERCARGO, INTERTANKO and IPTA) brought this issue to the attention of the IMO Sub-Committee on Implementation of IMO Instruments (III 5) in September last year – through the submission attached at **annex A**. During the meeting EQUASIS also put forward a so called interim measure (attached at **annex B**), whereby some fields for two separate reports about the same inspection of the same ship have been merged. This includes the 'Detention' field, but not the 'Number of deficiencies' field, which continues to be duplicated.

For this reason, the industry continues to advocate for data about a single PSC inspection to be recorded only once on the databases of PSC information systems such as EQUASIS, to ensure that they accurately reflect the quality of an individual ship. Based on private discussions with representatives from PSC regimes, the Secretariat understands that the concern for some of the regimes, at least in part, centres around the potential cost implications associated to any possible permanent technical solution for eliminating the duplications.

Disappointingly, during discussions at EQUASIS and at IMO, some PSC regimes (the Paris MOU in particular) have expressed the view that this was a problem for the custodians of PSC Information Systems (e.g. EQUASIS and IMO) to sort out, disregarding the fact that they are unable to do so on their own, since they are not permitted to interpret or modify the data they receive from the various PSC regimes.

More recently, in light on the continued pressure from the industry (led by ICS), IMO III 6 agreed earlier this year to include this issue for further discussion at the next IMO 'Workshop for PSC MoU/Agreement Secretaries and Database Managers' – expected to take place sometime in 2020 (date to be determined) – where it is anticipated that all the relevant stakeholders will be in attendance.

A news article released by TradeWinds on 3 July 2019, sheds some light on the issue:  
<https://bit.ly/2Z7O2Le>.

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Since this came to light, EQUASIS continues to receive a substantial number of complaints from shipping companies on a monthly basis. ICS national associations are therefore requested to consult with their respective member companies and provide comments to the Secretariat ([helio.vicente@ics-shipping.org](mailto:helio.vicente@ics-shipping.org)) as soon as possible, with a view to further discussion during the upcoming SPC meeting on 9 September 2019 and to help shape the ICS approach to addressing this issue going forward.

Helio Vicente  
Senior Adviser

SUB-COMMITTEE ON IMPLEMENTATION  
OF IMO INSTRUMENTS  
5th session  
Agenda item 5

III 5/5/4  
6 July 2018  
Original: ENGLISH

**MEASURES TO HARMONIZE PORT STATE CONTROL (PSC) ACTIVITIES AND  
PROCEDURES WORLDWIDE**

**Comments on document III 5/5/3**

**Submitted by ICS, BIMCO, INTERCARGO, INTERTANKO and IPTA**

**SUMMARY**

*Executive summary:* This submission comments on document III 5/5/3 regarding the EQUASIS information system, and draws attention to some industry concerns arising from duplicate entries of national port State control (PSC) inspection data, submitted by regional PSC regimes for inclusion on databases of PSC information systems

*Strategic direction, if applicable:* Other work

*Output:* OW 10

*Action to be taken:* Paragraph 9

*Related document:* III 5/5/3

**Introduction**

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.1) and comments on document III 5/5/3 (Secretariat) containing information on the recent developments concerning the EQUASIS information system, and draws attention to some industry concerns arising from duplicate entries on databases of port State control (PSC) information systems such as EQUASIS and GISIS.

2 In order to provide a global overview of the performance of the world merchant fleet and to help improve the safety and quality of ships, PSC information systems such as EQUASIS and GISIS disseminate PSC inspection data. This inspection data, which is provided by national PSC authorities to regional PSC regimes for inclusion on databases of PSC information systems, can be used, inter alia, for enforcement purposes (e.g. to target ships for inspection) and for various commercial purposes (e.g. by charterers).

## Discussion

3 The co-sponsors have identified that, in cases where national PSC authorities are members of two or more regional PSC regimes, the entries of a single PSC inspection may be duplicated in the databases of PSC information systems (i.e. inserted more than once as separate entries), since the data is submitted by more than one regional PSC regime.

4 This has raised concerns within the industry, particularly in cases where an inspection has resulted in a detention. Given that a single PSC inspection can be listed as different separate entries in databases of PSC information systems, this can lead to an individual ship being perceived as having received two or more detentions when, in reality, it was only detained once. In some cases, the same inspection has been listed under different dates. As a result, this can provide the wrong impression regarding the performance of a particular ship and, therefore, lead to serious commercial consequences for shipowners and operators in all sectors and trades, while also negatively affecting the effective deployment of PSC resources.

5 EQUASIS is a good example of such a PSC information system, as it receives inspection data for the same incident from more than one regional PSC regime, and subsequently lists them as separate entries in its database. The role of EQUASIS is simply to present the data it receives, not to interpret it or to make assumptions about it. Therefore, finding a solution to help eliminate duplicate entries in EQUASIS would require a joint effort between the regional PSC regimes, EQUASIS and national PSC authorities, especially those that currently submit data to more than one regional PSC regime.

6 The co-sponsors consider that options exist to address these issues, for example, by improving the initial filtering processes of databases of PSC information systems to remove duplicate entries upon receipt from regional PSC regimes. In addition, lessons might be learned from other data systems which may also be faced with the risk of duplicate entries, e.g. casualty data in the aviation sector.

7 The co-sponsors consider that data about a single PSC inspection must be recorded only once in the databases of PSC information systems such as EQUASIS. This would ensure that PSC information systems accurately reflect the quality of an individual ship. Noting that the credibility of PSC information systems is based on the provision of accurate inspection data about ships, failure to address this situation risks undermining that credibility.

## Proposal

8 Therefore, taking into account the issues highlighted in this document, the co-sponsors propose that the Sub-Committee should encourage the custodians of PSC information systems, regional PSC regimes and national PSC authorities to:

- .1 coordinate and jointly consider measures to eliminate duplicate entries on databases of PSC information systems, in cooperation with other relevant stakeholders, as appropriate (e.g. flag Administrations, and non-governmental organizations);
- .2 cooperate and coordinate to the best extent possible, in order to safeguard the quality and accuracy of the data made available by PSC information systems; and

- .3 coordinate and jointly explore, preferably under the auspices of the Organization for harmonization purposes, potential remedial mechanisms and possible lessons which might be learned from the aviation industry, as proposed in paragraph 6 of this document.

**Action requested of the Sub-Committee**

- 9 The Sub-Committee is invited to consider the comments and proposal in paragraph 8 of this document, and take action as appropriate.
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ANNEX

TECHNICAL SOLUTION TO RESOLVE THE DISCREPANCIES CREATED DUE TO DOUBLE REPORTING OF PSC DETENTIONS  
TO EQUASIS BY STATES BEING MEMBERS OF MORE THAN ONE PSC MOU



1000 Active Company

Home Administration My Equasis About Equasis Statistics

Ship info		Inspections (30)					Ship History	
Authority	Port of inspection	Type of inspection	Date of report	Detention	PSC Organisation	Duration (days)	Number of detentions	Details
Japan	Nagoya, Aichi	Initial inspection	20/12/2016	N	Tokyo MeU			→
Australia	Gladstone	Initial inspection	25/06/2016	N	Indian Ocean MeU			→
Australia	Newcastle	Followup inspection	11/09/2013	N	Tokyo MeU		1	→
Australia	Newcastle	Followup inspection	12/07/2013	N	Tokyo MeU		1	→
Australia	Newcastle	Followup inspection	11/12/2012	N	Tokyo MeU		2	→
Australia	Newcastle	Initial inspection	01/12/2012	Y	Indian Ocean MeU	1	9	→
Australia	Portland	Initial inspection	03/06/2012	N	Tokyo MeU	N/A	9	→
Australia	Newcastle	Initial inspection	31/10/2011	N	Indian Ocean MeU		1	→
Australia	Newcastle	Initial inspection	22/03/2011	N	Indian Ocean MeU		6	→
Belgium	Ghent	Initial inspection	23/12/2010	N	Indian Ocean MeU		4	→
Canada	Hamilton	More detailed inspection	05/08/2010	N	Paris MeU		1	→