

MMIA STEEL PRELOADING SURVEYS: GUIDANCE TO SURVEYORS

SURVEY APPOINTMENT	<ul style="list-style-type: none"> The attending surveyor must be approved by MMIA. The surveyor's fee and expenses will be paid directly by the instructing MMIA member/shipowner.
SURVEY SCOPE	<p>The survey required by MMIA P&I Rules of Entry, Rule 4.19 (xii) consists of 6 elements.</p> <p>ELEMENT 1 - Pre-Attendance Arrangements ELEMENT 2 - Steel Preloading Survey ELEMENT 3 - Cargoworthiness Assessment ELEMENT 4 - Steel Loading Survey ELEMENT 5 - Post Load Securing Check ELEMENT 6 - Bill of Lading Clauses and Signature</p> <p>The manner in which each Element is to be accomplished and reported is detailed below.</p>
ELEMENT 1 Pre-Attendance Arrangements	<p>A. Obtain details of all cargo information available from the local port agent inclusive of stowage plan, steel cargo description, quantity and weight.</p> <p>B. Ensure all survey equipment is ready inclusive of:</p> <ol style="list-style-type: none"> Silver nitrite for steel surface chloride testing Tools for taking samples of surface chloride and corrosion samples Sample jars which can be sealed and tagged for any subsequent lab analysis. Camera date and time data checked, set to imprint date and time to all photo images and tested. Camera Close-Up/Macro capability or equivalent system checked according to model and type and tested.
ELEMENT 2 Steel Preloading Survey	<p>It is accepted that permission to access port and terminal areas varies from port to port. <u>If permitted by port/terminal authorities</u>, surveyors should attend at the cargo storage site in advance of the vessel's arrival at the loading berth. If surveyors are not permitted access for cargo survey prior to the nominated vessel's berthing, then the condition of the cargo on the jetty must be surveyed and recorded before it is loaded on board the vessel.</p> <p>The Preloading Survey must include the following:</p>

	<p>A. Obtain and record the full details of whether the steel cargo has been stored, whether under full cover (e.g. warehouse) or outside and exposed to the weather. If stored outside, then make enquiries and record the time that the cargo has been stored and the general weather conditions experienced during that period.</p> <p>B. Record and photograph the nature, extent and cause of any corrosion (rust) and/or mechanical (handling) damage observed.</p> <p><i>NOTE: It is essential that Close-Up photo images be taken of observed damage using a camera with Macro or equivalent capability. This is to ensure the provision of the detailed evidence necessary to prove the precise nature, cause and extent of pre-existing damage.</i></p> <p>C. Describe any damage observed using only the words and phrases prescribed in ANNEX 1 to this Guidance Note. No other words or phrases should be used.</p> <p>D. If visible, note and photograph the shipment marking details of any damaged cargo unit.</p> <p>E. Steel surfaces with signs of staining or spotting should be tested for chlorides/sea water residue presence using silver nitrate. If the test is positive, then:</p> <ul style="list-style-type: none"> i. Surface scraping samples should be taken and secured in labelled and sealed containers for possible later lab analysis. ii. Mates Receipts should be noted as 'chloride contamination present prior to loading'. <p><i>NOTE: Two sealed sets of each sample should be prepared with one set retained by the surveyor and the other set handed to the Master. The Master should then provide a signed and dated receipt.</i></p> <p>F. A Pre-Loading Cargo Condition/Exceptions List should be prepared immediately and then transmitted to the shipowner and vessel Master, preferably before loading commences. A selection of about 5-6 photos should be included to provide a visual impression of cargo condition. An e-mail copy should also be sent to MMIA (enquiry@marpacfic.com; enquiry@fepandi.com).</p> <p><i>NOTE: If the cargo is observed as damaged before loading, early advice is essential to enable pre-load agreement with shippers/charterers to permit rejection of damaged cargo or agree other acceptable protective terms.</i></p>
<p>ELEMENT 3</p> <p>Cargoworthiness Assessment</p>	<p>The Master's attention should first be directed to MMIA Risk Bulletins:</p> <ul style="list-style-type: none"> i. No. 5, SHIP'S HATCH COVERS: KEEPING CARGOES DRY ii. No. 24, 'DUE DILIGENCE' AND CARGO DAMAGE DUE TO HOLD PIPING FAILURES

A Cargoworthiness Assessment should be then accomplished, as detailed below. Any defects noted should be brought to the immediate attention of the Master and rectification, prior to completion of loading, recommended.

A. Hatch covers, inclusive of:

- i. Steel structure and general maintenance of the hatch covers, coamings and opening/closing systems.
- ii. Rubber seals and hatch coaming compression bars.
- iii. Hatch cover securing system inclusive of cleats and compression washers.
- iv. Hatch coaming drains and non-return valves.
- v. Any evidence of sea water ingress e.g. rust staining on the inside of the hatch coamings.
- vi. Any evidence of the supplementary use of hatch sealing tape and/or expanding foam, or the use of supplementary tarpaulins, which may indicate that the steel hatch covers are not fully weathertight.

NOTE: It is generally recognised that the use of supplementary hatch cover sealing materials may be permitted as a temporary measure only. The attending surveyor should record the reason and length of time any such materials may have been in use, their apparent effectiveness and the weather conditions forecast for the forthcoming voyage. The surveyor must then discuss with the Master and report his professional opinion as to whether the hatch cover sealing will prove sufficiently weathertight to prevent ingress of sea water and damage to the cargo.

B. Hold ventilation system, inclusive of:

- i. Steel structure and general maintenance.
- ii. Maindeck ventilation closure systems and heavy weather securing system.
- iii. Any evidence of prior sea water ingress into the cargo ventilation system.
- iv. Any evidence of use of sealing tape or expanding foam, etc. indicating that the weather deck ventilator openings may not be weathertight.

C. Cargo hold condition in relation to:

- i. Cleanliness and suitability for steel cargo, inclusive of rinsing of hold surfaces with fresh water and subsequent testing with silver nitrate.
- ii. Structural condition, including integrity of cargo hold piping systems.
- iii. Tank top condition and securing of manhole covers to double bottoms and void spaces.

NOTE: If there are any concerns as to tank top condition and integrity in way of water ballast double bottom tanks, the surveyor

	<p><i>should request that these tanks be pressurised but always subject to port authority regulations.</i></p> <p>iv. Bilge well suction cleaning and pumping system testing.</p>
<p>ELEMENT 4</p> <p>Steel Loading Survey</p>	<p>The surveyor must ensure that:</p> <ul style="list-style-type: none"> A. The details of the weather experienced both immediately before and during the loading process are recorded, together with any weather related stoppages and related closures of the hatch covers. B. The Master is advised that, subject to the shipper's agreement, MMIA recommends that any damaged cargo is returned ashore and replaced by sound cargo. C. The Master is able to confirm that, by reference to the cargo unit weight, the stowage plan and the vessel's stability booklet, the cargo stow will not exceed the maximum permissible cargo hold tanktop load capacity. D. The loading process is attended by a suitably experienced surveyor throughout. E. Cargo tallying arrangements are sufficient to provide an independent check of the cargo quantity loaded. F. Any stevedore cargo handling damage (to ship or cargo) or any unsafe cargo stowage is informed to the Master. <p><i>NOTE: The Master should also be advised to issue a formal Note of Protest (NOP) holding both the Stevedore Company and the Shipper/Charterer responsible for any associated cargo claims and/or damage to the vessel.</i></p> <ul style="list-style-type: none"> G. Any mechanical or other damage to the cargo suffered during loading is added to the ELEMENT 2 - Preload Cargo Condition/Exceptions List in order to update this document to an ELEMENT 4 - As Shipped Cargo Condition/Exceptions List. <p><i>NOTE: The recommended clauses contained in Annex 1. must be used. Additionally, the cause of damage must also be clearly stated.</i></p> <ul style="list-style-type: none"> H. Mate's Receipts are presented by cargo shippers to the Master and Chief Officer for their notation and signature as to cargo condition and quantity. Notations should be made on the Mate's Receipts in accordance with and by specific reference to the surveyor's final ELEMENT 4 - As Shipped Cargo Condition/Exceptions List.

<p>ELEMENT 5</p> <p>Post Load Securing Check</p>	<p>The surveyor must ensure that:</p> <ul style="list-style-type: none"> A. Enquiries are made and recorded as to which party (shipowner or charterer) is responsible for cargo dunnage and cargo securing, inclusive of lashing materials. B. Subject to regulation at the port of discharge, all wood dunnage used meets International Standards for Phytosanitary Measures No. 15 (ISPM 15) standards and is clearly marked and provided with a certificate to confirm this. C. The cargo is properly secured in accordance with the procedures detailed in the vessel's flag state approved SOLAS or NCVS Cargo Securing Manual.
<p>ELEMENT 6</p> <p>Bill of Lading Clauses and Signature</p>	<p>The Master's attention should first be directed to MMIA Risk Bulletin No. 6, CLEAN BILLS, DIRTY BILLS AND LOI'S – BE VERY CAREFUL!</p> <p>The surveyor should then assist the Master by ensuring that:</p> <ul style="list-style-type: none"> A. If the Bills of Lading (B/Ls) are to be signed by the Master, they are claused as to the condition of the cargo. <ul style="list-style-type: none"> i. If no damage, then as either 'In apparent good condition' or 'Clean on board'. ii. If damaged, then it should be noted on the front of the B/Ls that 'Cargo condition is as stated in the Mate's Receipts and the As Shipped Cargo Condition/Exceptions List.' <p><i>NOTE: MMIA Risk Bulletin No 6 advises that if the cargo is damaged, the shipper/charterer may request signature of 'Clean Bills of Lading' in exchange for a Letter of Indemnity (LOI). An LOI of this nature may not be legal or enforceable in law. It must also be understood that MMIA P&I will not provide cover for any claims which may arise from the signature of Clean B/Ls or the acceptance of an LOI in the aforementioned circumstances.</i></p> <ul style="list-style-type: none"> B. If the B/Ls are to be signed by the ship's agent, after the vessel's departure, then the surveyor should advise the Master that: <ul style="list-style-type: none"> i. The Master's Letter of Authority (LOA) for the agent to sign B/Ls on his behalf must be provided in MMIA's recommended terms as provided at ANNEX 2. ii. The LOA terms must include the requirement for all B/Ls to be claused in strict accordance with the clausing of the Mate's Receipts and the content of the As Shipped Cargo Condition/Exceptions List. iii. A copy of the Master's LOA should be attached to the surveyor's Final Report. <p><i>NOTE: If the agent does not comply with the instructions in the LOA, then the agent and their principal will become liable for the consequences for their misconduct.</i></p>

<p>REPORT PRODUCTION STAGES</p>	<p>STAGE 1 - Element 2 - Pre-Load Cargo Condition/Exceptions List, should be completed on a priority basis and preferably before cargo loading commences. A copy should be handed/transmitted to the Master with e-mail copies to the shipowner and MMIA.</p> <p>STAGE 2 - Element 4 - As Shipped Cargo Condition/Exceptions List, should be completed on site and before the Mate's Receipts and the Bills of Lading are claused and signed. A copy must be made available to the Master with e-mail copies to the shipowner and MMIA.</p> <p>STAGE 3 - Final Steel Loading Survey Report should be completed within 48 hours of the surveyor's departure from site, with e-mail copies to the shipowner and MMIA (enquiry@marpacific.com; enquiry@fepandi.com).</p>
<p>ANNEXURES</p>	<p>ANNEX 1 – Damage Description/Clausing Terms ANNEX 2 – Master's Letter of Authority to Agents to Sign Bills of Lading</p>