

Local Vessel Advisory Committee

**Revision to Marine Department Notice
in relation to Towing Voyage Survey**

Purpose

This paper informs members on the proposed revision to Marine Department Notice No. 68 of 2016 “Acceptance of Towing Voyage Survey Conducted by Non-Government Surveyors” (the Notice) as attached at **Annex 1**.

Background

2. Hong Kong, as an associate member of the International Maritime Organization (IMO), adopts the advisory guidance set out in the IMO circular MSC/Circ.884 “Guidelines for Safe Ocean Towing” (IMO Guidelines) for ocean towing.

3. For the issuance of port clearance to a non-self-propelled vessel leaving Hong Kong to other area/country under tow, the Notice requires that the tug and tow are to be subject to a towing voyage survey. Currently, the survey should be conducted either by surveyor of a Marine Department (MD) recognized organization (RO)¹ or Authorized Surveyors (AS) appointed under the Merchant Shipping (Local Vessels) Ordinance² according to their intended voyages.

4. However, there were a number of cases that the ROs to MD could not carry out towing voyage surveys as the concerned vessels were not classed with them; or that the foreign flag States of the concerned vessels had assigned their own recognized surveyors instead of MD’s ROs or AS to complete the towing voyage survey. Under such circumstance, the shipping industry has

¹ MD recognized organizations included: - (i) American Bureau of Shipping (ABS); (ii) Bureau Veritas SA (BV); (iii) China Classification Society (CSS); (iv) DNV AS (DNV); (v) Korean Register (KR); (vi) Lloyd's Register Group Limited (LR); (vii) Nippon Kaiji Kyokai (NK); (viii) RINA Services S.p.A. (RINA); and (ix) Russian Maritime Register of Shipping (RS).

²The List of Recognized Authorities, Authorized Organizations and Authorized Surveyors is available at https://www.mardep.gov.hk/en/pub_services/ocean/pdf/lvs_list.pdf

requested that towing voyage survey conducted by vessel's flag State should be included in the Notice.

Proposed Amendments

5. For facilitating the operation of shipping industry more efficiently, it is considered that a towing survey conducted by foreign flag State's authorized surveyor/inspector is acceptable, provided that there are proof to show that such survey has been conducted in accordance with the IMO Guidelines. In this respect, MD will make the following amendments (with updates highlighted in blue) to paragraphs 4(b), 5(b) and 6 of the Notice: -

(a) Paragraph 4(b): "for long distance coastal towing voyages to Mainland ports outside (a) above and ocean towing voyages to other countries, surveys conducted by either surveyor of a MD recognized organization or the concerned vessel's flag State will be accepted.";

(b) Paragraph 5(b): "issue an appropriate recognized organization or concerned vessel's flag State survey report for voyages prescribed in paragraph 4(b) above.";

(c) Paragraph 6: To facilitate the survey for short distance coastal towing voyages, guidance notes are provided at Annex 2. For long distance coastal and ocean towage, surveyors of MD recognized organization or flag State are required to take into account the guidance provided in IMO circular MSC/Circ. 884, and any relevant requirements of the MD recognized organization or flag State (where applicable) in respect of the concerned vessels involved in towing.

Comments from Members

6. Members are welcome to provide comments on the above arrangement.

Way Forward

7. If no comment is received from the Member, MD will issue a revised MDN to reflect the amendments as stated in paragraph 5 above.

December 2022
Local Vessel Safety Section
Marine Department

Enclosure:

Annex 1: Marine Department Notice No. 68 of 2016 - Acceptance of Towing Voyage Survey Conducted by Non-Government Surveyors

Marine Department Notice No. 68 of 2016
(Statutory Requirements and Related Information)
**Acceptance of Towing Voyage Survey Conducted by
Non-Government Surveyors**

NOTICE IS HEREBY GIVEN that the arrangement in conducting towing voyage surveys for issuing port clearance has been adopted by the Marine Department, as described in the following paragraphs.

2. For issuing port clearance to a non self-propelled vessel leaving Hong Kong to other areas/countries under tow, the tug and tow are required to undergo a towing voyage survey conducted by a non-government surveyor. The purpose of this towing voyage survey is to ensure that the vessel and the towing arrangement are fit for the intended voyage.

3. With a view to allowing ship owners in choosing non-government professional bodies to survey their vessels, it is decided that towing voyage surveys conducted by Marine Department recognized organizations (http://www.mardep.gov.hk/en/pub_services/surveycs.html) and Authorized Surveyors appointed under the Merchant Shipping (Local Vessels) Ordinance (http://www.mardep.gov.hk/en/pub_services/ocean/lvs.html) would be accepted for issuing port clearance to vessels under tow leaving Hong Kong.

4. Taking into account that there are substantial differences in risk levels, competence and technical support requirements in conducting surveys between vessels engaging on short coastal towage and ocean towage, the following acceptance criteria are adopted:

- (a) for **short distance coastal towing voyages** to Mainland ports within Chinese waters extending from Guangxi to Xiamen (including Macau), surveys conducted by either a surveyor of a recognized organization or an “Authorized Surveyor” can be accepted;
- (b) for **long distance coastal towing voyages** to Mainland ports outside (a) above and **ocean towing voyages** to other countries, only surveys conducted by a surveyor of a recognized organization will be accepted.

5. To ensure that the survey by these professional bodies can adequately cover the safety of the tug and tow for the intended voyage, the attending surveyor is required to:

- (a) complete a declaration with a checklist (a copy is attached at Annex 1) for voyages prescribed in paragraph 4(a) above, or
- (b) issue an appropriate recognized organization survey report for voyages prescribed in paragraph 4(b) above.

6. To facilitate the survey for short distance coastal towing voyages, guidance notes are provided at Annex 2. For long distance coastal and ocean towage, surveyors of the recognized organization are required to take into account the guidance provided in IMO circular MSC Circ. 884, and any relevant requirements of the recognized organization in respect of vessels involved in towing.

7. To apply for port clearance for a towing voyage, the Master of the tug is required to submit a completed application form (a copy is attached at Annex 3), together with the declaration or survey report issued by the attending surveyor, to the Licensing and Port Formalities Section of the Marine Department.

8. For enquires, please contact the Passenger Ships Safety Section, 24/F Harbour Building, 38 Pier Road, Central, Hong Kong, telephone number 2852 4500, facsimile number 2545 0556, email : sspax@mardep.gov.hk.

9. Marine Department Notice No. 56 of 2007 is hereby revoked.

Maisie CHENG
Director of Marine

Marine Department
Government of the HKSAR
Date: 31 May 2016
Action file ref.: SD/S 117/1/1

To: Director of Marine
 Hong Kong Marine Department
 c/o: Master of Towing Vessel named below

Declaration of Survey for Towing Voyage

Port / country* of Licence / Registration* of Towing Vessel : _____

Name of Towing Vessel : _____ Licence / Registration No. _____

Name of Vessel(s) being towed : _____ Licence / Registration No. _____

Name of Vessel(s) being towed : _____ Licence / Registration No. _____

No.	Survey Items for <u>Towing Vessel</u>	Y/N	Remark (If any)
1	Valid certificates/licences for towing vessel for the intended voyage		
2	Valid certificates/licences for Master, Engineer		
3	Updated nautical charts for the intended voyage		
4	Appropriate navigational lights, shapes & radio equipment in working condition		
5	Appropriate fire-fighting & lifesaving appliances in working condition		
6	Towing & emergency/spare towing gear and arrangement in working condition		
7	Sufficient fuel for the intended voyage		
	Survey Items for <u>Vessel(s) being towed</u>		
8	Vessels(s) are seaworthy for the intended voyage		
9	Drafts of vessels are checked with adequate intact stability		
10	Appropriate navigation lights and shapes in working condition		
11	Sufficient battery capacity for navigational lights for the intended voyage		
12	Spare light bulbs for navigating lights available		
13	Closing arrangement for deck openings in satisfactory condition and secured properly		
14	Cargo, equipment & store are properly secured		
15	Equipped with anchor for emergency use		
16	Boarding facilities are properly rigged on the tow		

Note : All check boxes should be filled as appropriate

The undersigned declares that the towing voyage survey covering the items in the checklist above has been carried out and found satisfactory.

It is recommended that Port Clearance be issued to the subject vessels for the towing operation.

Remark (if any)

Signed : _____
 (Name of attending Surveyor) ^(note 1)

 (*RPE registration No./Name of recognized organization)

* delete where not applicable

Date : _____

Note 1 : Surveyor of recognized organization or Registered Professional Engineer (Marine Engineering and Naval Architecture discipline)(“RPE”) appointed as Authorized Surveyor under Cap 548, as appropriate.

Guidance Notes on Survey Checklist for Towing Voyage

These guidance notes are for general guidance only and are not conclusive. The attending surveyor should exercise his professional knowledge and judgment in conducting the survey. Where necessary, survey notes should be recorded against individual survey items:-

No.	<u>Survey Items for Towing Vessel</u>	<u>Guidance Notes</u>
1	Valid certificates/licences for towing vessel for the intended voyage.	Check validity of vessel's certificates/licences, and note down all information on issued date, expiry date, issuing organization etc. If the tug is registered in Hong Kong or holds a valid Hong Kong Licence for the intended voyage, inspection for the tug is not required.
2	Valid certificates/licences for Master, Engineer.	Check validity of Master/Engineer's certificate/licence. Note down the name of certificate holder and number, issue date and validity date etc and also entered in "remark column" the name of certificate holder and number.
3	Updated nautical charts for the intended voyage.	Check availability and updating of all charts that would be used for the towing operation. Information on updated charts are available at following web-sites:- http://www.ukho.gov.uk/nmwebsearch/ for Admiralty Charts http://www.hydro.gov.hk/product/ntm.htm for Hong Kong Charts http://hydro.ngd.gov.cn/chartdaili.aspx for Chinese Charts The above web sites are for reference only and subject to change by the concerned organization.
4	Appropriate navigational lights, shapes & radio equipment in working condition.	Check availability of equipment required for towing, and their general and working condition.
5	Appropriate fire-fighting & lifesaving appliances in working condition.	Check service records and general condition.
6	Towing & emergency/spare towing gear and arrangement in working condition.	Check general condition and arrangement. Emergency/spare towing gear should be ready for immediate use.
7	Sufficient fuel for the intended voyage.	Verify the amount of fuel on board against consumption rate and voyage plan to confirm that fuel is sufficient for the intended voyage.
	<u>Survey Items for Vessel(s) being towed</u>	
8	Vessels(s) are seaworthy for the intended voyage.	Check general condition and integrity of hull and deck. Damaged vessel should at least have been temporarily repaired or securely patched to withstand the weather during the voyage.
9	Drafts of vessels are checked with adequate intact stability.	Check and record drafts. Confirm adequacy of intact stability.
10	Appropriate navigation lights and shapes in working condition.	Check availability of equipment required for towing, and their general and working condition.
11	Sufficient battery capacity for navigational lights for the intended voyage.	Evaluate the battery capacity against length of voyage and check that the batteries are fully charged.
12	Spare light bulbs for navigating lights available.	Check availability of spare light bulbs of the correct type.
13	Closing arrangement for deck openings in satisfactory condition and secured properly.	Check closing arrangement for deck openings to see if they are in satisfactory condition and secured properly.
14	Cargo, equipment & store are properly secured.	Check if they are properly secured.
15	Equipped with anchor for emergency use	Checked availability and readiness.
16	Boarding facilities are properly rigged on the tow.	Check if such facilities are properly rigged on the tow.

To: Licensing and Port Formalities Section
 Hong Kong Marine Department
 Harbour Building
 38 Pier Road, Central
 HONG KONG
 Tel: 2852 3080
 Fax:2545 1535

Application for Port Clearance on Towing Voyage

(To be completed/confirmed by Towing Master)

Name of Towing Vessel : _____ License / Registration No. _____

Name of Vessel(s) being towed : _____ License / Registration No. _____

Name of Vessel(s) being towed : _____ License / Registration No. _____

Particulars of towing voyage

Destination : _____

Estimated time/date of Departure : _____ Estimated time/date of Arrival : _____

No. of hours required for Towing : _____ Fuel required for the voyage : _____

I attach a copy of "Declaration of Survey for Towing Voyage/Survey report*" in connection with subject application. The following recommendations for vessels engaged in Towing Operations have been read and understood by me and I undertake to comply with the same.

* ***delete where appropriate***

Signed : _____

Towing Master

M.V. _____

Date : _____

(Towing Vessel with stamp)

Recommendations for vessels engaged in Towing Operations

- (1) Towing Master should ensure navigation lights or shapes are properly displayed to indicate the towing operation.
- (2) The voyage should proceed only when there is a favorable weather forecast. Towing Master should be aware of the onset of bad weather particularly in respect of arrangements for heaving to or taking shelter.
- (3) The vessel being towed should remain unmanned, except in emergency, for the duration of the voyage.
- (4) Proper look out under the International Regulations for Preventing Collisions at Sea 1972, as amended (Rule 5) should be maintained .
- (5) When appropriate the rudder of the vessel being towed should be secured in the amidships position and measures are to be taken to prevent the propeller shaft from turning.
- (6) To reduce the risk of pollution, the amount of oil carried on the tow should be limited to what is required for the safety of the tow and for its normal operation.