CIRCULAR LETTER No. 4/26

of MANAGEMENT BOARD OF POLSKI REJESTR STATKÓW S.A.

dated 20 of August 2026

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 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.

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 considered and followed 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 of the deficiencies being grounds for detention refers to the scope of PRS' surveys.

In such cases, 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.

However, in case PRS is acting on the ship as Recognized Organization, and detainable deficiencies fall into PRS' scope of certification, a survey, of the annual scope (for any statutory certificates related to the detainable deficiencies recorded on the inspection report), must be carried out. E.g. if the detainable deficiency is related to the condition of the emergency generator, then a Cargo Ship Safety Construction Annual Survey, in possible to execution scope, must be carried out.

If PRS issues the Safety Management Certificate (SMC) for the ship, the ship may be subjected to the additional ISM audit.

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 PRS/Flag detention, but also about each PSC/Flag 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.**

In such a case, in addition to measures described in Para. 1, 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 for the Company's Office in scope of an annual will be performed. In case 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 an additional survey/audit/inspection may be required if the circumstances require. The results of the above-mentioned survey, audit or inspection will be revised by PRS Classification Committee.

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

Additional measures may be taken to help the Shipowner and the vessel to improve compliance with requirements of the applicable conventions. These measures may include implementation of regime of additional surveys/audits every three or every six months. Results of such surveys/audits/inspections will be evaluated. Close cooperation with 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. **Owner's/ Operator's PSC/FSI detentions' rate.**

If the rate is higher than 2 (the number of PSC/FSI detentions of PRS classed/certified ships in the last 3 years divided by the number of PRS classed/certified ships), than the Classification Committee may consider invalidating the issued certificates and withdrawing all the vessels operated by the Company, which are classed/certified by PRS.

5. The Circular letter No 1/24 dated 17 of January 2024 on measures to minimize the number of detentions by Port State Control of PRS classed/certified vessels becomes obsolete.

6. The Circular letter enters into force on the date of signing.

Management Board

of Polski Rejestr Statków S.A.

For the Management Board,

Grzegorz Pettke, the Board President

Distribution list: **4**

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