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WORLD MARITIME UNIVERSITY
Malmö, Sweden

**ANALYSIS OF FLAG STATE
IMPLEMENTATION OF MARPOL BY
SAUDI ARABIA WITH REFERENCE TO III
CODE**

By

MOHAMMED MESHAL M ALMUTAIRI
Saudi Arabia

A dissertation submitted to the World Maritime University in partial
fulfilment of the requirements for the reward of the degree of

MASTER OF SCIENCE
In
MARITIME AFFAIRS

(MARITIME LAW AND POLICY)

2020

Declaration

I certify that all the material in this dissertation that is not my own work has been identified, and that no material is included for which a degree has previously been conferred on me.

The contents of this dissertation reflect my own personal views, and are not necessarily endorsed by the University.

(Signature):

Mohammed Meshal M Almutairi

(Date):

September 20, 2020

Supervised by: **Dr. Aref Fakhry**

Supervisor's affiliation: **MLP**

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Abstract

Title of Dissertation: **Analysis of Flag State Implementation of MARPOL by Saudi Arabia with Reference to III Code**

Degree: **Master of Science**

The dissertation is a qualitative analysis of the flag state implementation of MARPOL convention by Saudi Arabia with reference to the criteria of flag state obligations as laid down in the III Code. In addition, the study assesses the extent to which Saudi Arabia has or not met the implementation requirement and to identify potential gaps on the technical and legislative level in relation to the implementation and enforcement of this convention

The study looked at the main factors for the effective implementation of MARPOL provisions onboard the Saudi vessel which start from the ratification of the convention and the incorporation of its provisions into the national legislation to the extent of adequacy of the administrative capacity of the flag state in performing duties set out by the convention.

The primary data of the research was based on the mock audit report written by two IMO consultants during their assignment, to assist the maritime administration of Saudi Arabia in the process of preparing for an audit under the IMO Member State Audit Scheme and to conduct an audit and post-audit work to address findings from the audit. The other data utilised for the purpose of the study were gathered from information provided at the official Saudi governments websites.

Finally, the study analysis and suggest recommendations for the flag state administration to achieve effective implementation and enforcement of IMO conventions.

KEYWORDS: Flag State implementation, MARPOL, Maritime Administration, Delegation of Authority, III Code, National Legislative Process

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List of Abbreviation

ABS	American Bureau of Shipping
BV	Bureau Veritas
CML	Commercial Maritime Law
COLREG	The Convention on the International Regulations for Preventing Collisions at Sea, 1972
DNV-GL	Det Norske Veritas and Germanischer Lloyd
GISIS	Global Integrated Shipping Information System
GT	Grosse Tonnage
HSSC	Harmonized System of Survey and Certification
ICLL	International Convention on Load Lines, 1966
III Code	IMO Instrument Implementation Code
IMO	International Maritime Organization
ISM	International Safety Management Code
LR	Lloyd's Register of Shipping
MARPOL 73/78	The International Convention for the Prevention of Pollution from Ships, 1973 as modified by the Protocol of 1978
MoT	Ministry of Transport
NKK	Nippon Kaiji Kyokai
PME	The General Authority of Meteorology and Environmental Protection
PSC	Port State Control
RINA	Registro Italiano Navale
RO	Recognized Organization
SOLAS	International Convention for the Safety of Life at Sea, 1974 including 1988 Protocol
SPA	Saudi Ports Authority
STCW	International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended

TGA	Transport General Authority
UNCLOS	United Nations Convention on the Law of the Sea
UNCTAD	United Nations Conference on Trade and Development

1.0 Chapter One

1.1 Introduction

For centuries maritime transport has been synonymous with global trade, throughout the years it has developed to account for 90% of the world's trade transport making it the backbone of global trade. The Kingdom of Saudi Arabia due to its geographically strategic location retains the leading maritime role as it links the continents of Asia, Africa and Europe. The kingdom's extensive coastlines run 2,400 kilometres along the Red Sea shores westward and a thousand kilometres along the Arabian Gulf eastward. Furthermore, 13% of the global trade as well as 95 percent of Saudi Arabia's imports transit through its several seaports across the Red Sea and the Arabian Gulf which are considered amongst the largest and most efficient ports around the world increasing the regional and international maritime value of the kingdom (TGA, 2019). Saudi Arabia has been an active member of the IMO since 1969 and has ratified (40) conventions and protocols issued by the International Maritime Organization (IMO) (IMO, 2020). These conventions are shown figure 1 (IMO, Status of Conventions, 2020).

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2030	X	IMSO amendments 2031	X	IMSO amendments 2032	X	IMSO amendments 2033	X	IMSO amendments 2034	X	IMSO amendments 2035	X	IMSO amendments 2036	X	IMSO amendments 2037	X	IMSO amendments 2038	X	IMSO amendments 2039	X	IMSO amendments 2040	X	IMSO amendments 2041	X	IMSO amendments 2042	X	IMSO amendments 2043	X	IMSO amendments 2044	X	IMSO amendments 2045	X	IMSO amendments 2046	X	IMSO amendments 2047	X	IMSO amendments 2048	X	IMSO amendments 2049	X	IMSO amendments 2050	X	IMSO amendments 2051	X	IMSO amendments 2052	X	IMSO amendments 2053	X	IMSO amendments 2054	X	IMSO amendments 2055	X	IMSO amendments 2056	X	IMSO amendments 2057	X	IMSO amendments 2058	X	IMSO amendments 2059	X	IMSO amendments 2060	X	IMSO amendments 2061	X	IMSO amendments 2062	X	IMSO amendments 2063	X	IMSO amendments 2064	X	IMSO amendments 2065	X	IMSO amendments 2066	X	IMSO amendments 2067	X	IMSO amendments 2068	X	IMSO amendments 2069	X	IMSO amendments 2070	X	IMSO amendments 2071	X	IMSO amendments 2072	X	IMSO amendments 2073	X	IMSO 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Saudi Arabia to comply with international standards to preserve and protect the marine environments and secure safety of navigation.

1.2 An overview of the Executive Agencies to implement International Convention related to Maritime Transport ratified by Saudi Arabia

The Kingdom of Saudi Arabia has established the flag State authority, coastal State authority and port State authority under its executive arm of government to implement the international conventions related to maritime transport. The jurisdiction to oversee the flag state authority has been assign to the Transport General Authority in 2013 (SPTA, 2013). The other implementing agencies are Saudi Ports Authority (SPA), the Border Guard and Presidency of Meteorology and Environment (PME) (MOT, 2011).

1.2.1. The Transport General Authority

Previously, the maritime department was part of the Ministry of Transport (MOT) until the year 2012. However, in 2002 the Ministry of Transport was mandated by Royal Decree to coordinate the development of the National Transport Strategy (NTS) (MOT, 2011). The ministry carried out studies and researches to measure the performance and identify the challenges and issues facing the transportation sector in Saudi Arabia. The studies resulted in the National Transport Strategy (NTS) that has been approved by the Council of Ministers' decree No. (4), on 28/11/2011 (MOT, 2011). NTS analysis revealed that there was a lack of enforcement and oversight structures for the safety of transport at the national level. Moreover, there was a need for improving the administrative processes and the implementation of regulations.

Nevertheless, the increasing complexity of safety regulations compliance with safety standards also calls for proper oversight and coordination regimes. Hence, NTS priorities one of the main goals which is "Assigning the tasks of regulating, planning and follow-up of road transport and maritime transport to one agency" to Improve organizational, administrative, and managerial function as well to develop human resources required and provide the necessary legal and regulatory framework for efficient operation by service providers (MOT, 2011, p. 13). The year 2012 witnessed

the born of the Transport General Authority (TGA). The TGA is a Saudi government body that enjoys financial and administrative independence and was established following the Cabinet Resolution No. (373) on 01/10/2012 (TGA, 2019). Subsequently, the Law of the Public Transport Authority was issued by Cabinet Resolution No. (323) on 22/08/2013, to define the functions and objectives of TGA, regulate its field of work and the limits of its responsibilities (SPTA, 2013). As stipulated in Article 4 that "the Authority aims to organize, supervise and regulate the public transport activity, assure proper operations and well management of facilities and equipment, provide service with professional level and appropriate cost, encourage investment in accordance with the economic and social development objectives in the Kingdom, taking into account the technical and environmental aspects and integration with Air Transport Laws." (translated by the author). At the beginning of the establishment of the Law of the Public Transport Authority, TGA was organizationally related to the minister of transport. However, the law was amended by Cabinet Resolution No. (707) on 08/08/2017, linking TGA directly to the Saudi Prime Minister, and appointing TGA Board Chairman with a Royal Decree. The TGA role and responsibilities can be summarised into regulation, supervision, investment encouragement and development that need to be in line with the 2030 ambitious vision of Saudi Arabia which represents the country's roadmap to a prosperous future (TGA, 2019). The current organizational structure of the Transport general authority is shown in figure 2.

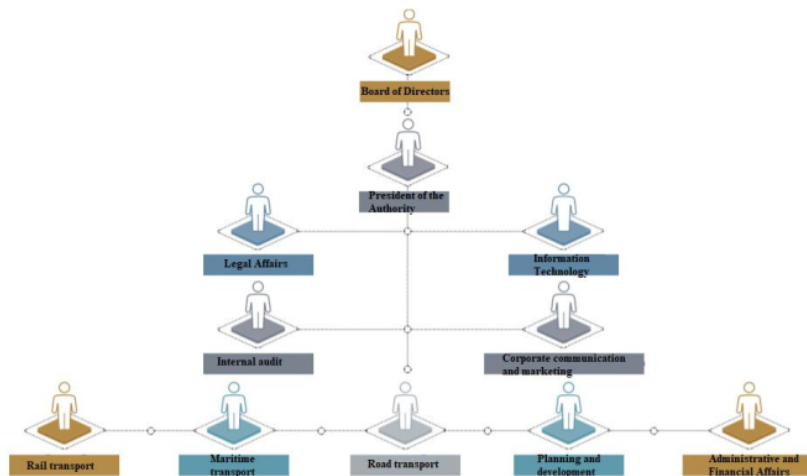


Figure 2: The current organizational structure of the Transport general authority (TGA, 2019).

1.2.2. Port state and Costal state authorities

SPA represents the port state authority in Saudi Arabia responsible for the port State control, flag State inspection, reception facilities, providing and maintaining navigation aids, vessel traffic service, Dangerous Cargo, maintaining the register for fuel suppliers and the navigation warnings. SPA is operating and managing nine ports and its headquarter located in Riyadh. Furthermore, Saudi Arabia is a member of the Riyadh Memorandum of Understanding on PSC (Riyadh MoU) (SPA, 2019).

The costal state activities is mainly managed by the General Directorate of Border Guard which is responsible for monitoring and protect maritime areas, ensuring compliance of persons with regulations governing the presence in each region, fighting organized crime across borders in the maritime field, maritime terrorism, and other maritime crimes, and detain the violators. Furthermore, the border guard carryout search and rescue operations and for this reason Saudi Arabia has established a Joint Maritime Rescue Coordination Centre (JMRCC) under the responsible entity the General Directorate of Border Guard and stakeholders such as the Saudi royal Navy in addition to there are additional 4 MRCC centres in Saudi Arabia. The JMRCC is

based in Jeddah and covers the coast of the Saudi Arabia. The JMRCC is equipped with modern communication equipment (e.g. LRIT, VHF DSC, MF/HF, Inmarsat C, NAVTEX, ISDN telephone), AIS access through a Vessel Monitoring System and access to VTS (Hindborg & Ghorbel, 2019). Another important role of the border guard is to observe the maritime and coastal environment and notify the competent authorities about any environmental hazards or pollution.

Another important agency in Saudi Arabia related to the protection of marine environment is the General Authority of Meteorology and Environmental Protection (PME) which responsible for The Saudi Arabian National Contingency Plan for Combating Marine Environment Pollution by Oil and Other Harmful Substances that has been approved in February 1991 (PME, 2019). The plan seeks to develop mechanisms for a coordinated and rapid response to protect the marine environment and the Saudi coast from the effects of pollution by making the most of available regional and international resources. the Kingdom of Saudi Arabia recognise that exploration for oil and the handling and transportation of oil and other harmful substances is to be carried out risks for environmental and economic damage or threat to public health. Therefore, in the event of a spill, swift and effective action will be taken to minimize environmental and public health and well-being risks resulting from such a spill. The plan assigns the General Authority of Meteorology and Environmental Protection as the national response coordinator for oil spill activities (PME, 2019). The plan also defines national, regional and local responsibility for the prevention and control of oil spills, as well as for the implementation of regional and local response plans. PME is responsible for the various activities related to response to pollution incidents at national level. Under the National Plan, PME shall establish, publish, and track the implementation of policies, regulations and procedures for combating and controlling pollution, in addition to undertakes the surveillance and studies required to monitor oil spills. The also performs environmental assessments to assess the effects of pollutants (PME, 2019). Throughout the response to the major spill crisis, PME has the duty to determine the required equipment to implement the National Plan.

1.3 Saudi Commercial Fleet

In normal circumstances, nationality is considered a legal link between a natural person and a specific country and is not usually granted for non-living things. However, since ships are of great importance to the country's economy and foreign trade as well due to its presence on the high seas, which are places that no one has control over, it was necessary to establish a link between the ship and a country in order to know that this ship is subjected to the protection and laws of that country.

The Saudi merchant fleet witnessed a remarkable growth in the number of registered vessels from 241 ships in 2016 to 387 ships in 2019, with a total tonnage of 7,733,649 gross tonnage (TGA, 2019).

1.4 Maritime Legal Framework in Saudi Arabia

One of the challenges Saudi Arabia was facing is that the legal regime for maritime transport was over 40 years old and does not fully reflect the needs of today's maritime industry. Previously, Saudi Arabia did not have a particular legislation on maritime trade, but these rules included in a set of existing regulations in the Kingdom, as shown in the following table:

Table 1 The previous Maritime Legal regimes in Saudi Arabia (Translated by author)

Regulation	Date of Issue	Approval Tool
Chapter Two of the Law of Commercial Court	01/06/1931	Royal Decree No. M/32
The Law of seaports, harbours and marine lighthouses and its executive regulations	14/07/1974	Royal Decree No. M/27
The executive regulations of The Law of seaports, harbours and marine lighthouses and its executive regulations	14/10/1975	Ministerial Resolution No. 181
Rules and conditions for granting a license to engage in maritime transport business	08/01/1983	Ministerial Resolution No. (53)

Conditions and rules for registering ships under the Saudi flag	08/01/1983	Ministerial Resolution No. (54)
Amendment of the rules and conditions for granting a license to engage in maritime transport business	02/08/1984	Ministerial Resolution No. (230)
Regulations for organizing the work of non-governmental international supervision and classification societies mandated to carry out inspection and examination work for Saudi ships and issue certificates	03/07/1985	Ministerial Resolution No. (147)
Regulations for organizing the activity of the office of the sales agency for sea tickets in the Kingdom	04/12/1985	Ministerial Resolution No. (20)
Regulations for the control and inspection of ships	07/04/1986	Ministerial Resolution No. (42)
Regulations for the safety and validity of navigation for fishing and recreational craft	01/07/1989	Ministerial Resolution No. (25)
The law of Ship and floating unit registration fee	21/07/1993	Royal Decree No. M/4

Source: (Saleema, 2017, pp. 24-25)

1.4.1 Saudi Commercial Maritime Law

The maritime transport in Saudi Arabia was previously subject to chapter two of the commercial court law issued by Royal Decree No.(M/32). The provisions of the commercial court law were based on the commercial ottoman code which in turn quoted the old French law " Code de Commerce " of 1807 (Darwish et al, 2019). Additionally, other considered regulations were the law of seaports, harbours and marine lighthouses of 1974, and many scattered ministerial resolutions that dealt with

organizing the legal framework for the maritime transport in the Kingdom. Furthermore, a lot of Saudi owned ships were generally registered abroad due to that the Saudi shipping register did not provide the requisite level of acceptance for foreign lenders or national banks to grant loans to shipowners, and previous register procedures are exhaustive and complicated (MOT, 2011).

In view of the successive developments in the field of shipping industry, the Kingdom's accession to many international agreements in the field of maritime transport and the urgent need for an independent maritime trade law. The Saudi regulator recently reviewed the provisions and rules relating to maritime transport, which came as scattered as mentioned in table 1, and take a significant step to develop the maritime transport sector and lay the basis for regulating maritime trade in the country by introducing new law, namely the law of Commercial maritime that was laid at the beginning of January 2019. The rules of this law are in line with the developments of maritime trade in the Kingdom of Saudi Arabia with a view to unifying the laws on maritime transport for all the parties concerned in a systematic and coherent legal framework. The new law also addressed and touched on several important topics in maritime trade, such as: the registration of vessels under the Saudi nationality, investment mechanisms in commercial ships whether by chartering, transporting goods or transporting passengers, In addition to laying down clear rules related to marine insurance and liabilities.

The law of Commercial Maritime issued by Royal Decree no. (M/33) Dated 12/12/2018 and published in the official newspaper on Friday, 04/01/2019. The Law came into effect 180 days after it was published on the official gazette on 03/07/2019 (Hashem, 2019). Furthermore, the new law is a comprehensive collection of the maritime regulations issued in the Kingdom. Accordingly, the new commercial maritime law supersedes Chapter two of the Commercial Court Law, the law of seaports, harbours and marine lighthouses and any other provision that contradicts it (Lawrence, Khurram , & Alhudaithi, 2019).

The commercial maritime law contained 391 articles distributed in ten chapters and applies to all Saudi ships, Offshore rigs and foreign vessels visiting the ports or maritime area of the Kingdom. While excluding warships and public vessels for non-commercial purposes (Mahayni, 2019). The chapters overview the key issues covered by the maritime law regarding the nationality, vessel Registration, Non-Saudi Vessels, and the Limitation of Liability as well vessel exploitation (Lawrence, Khurram , & Alhudaithi, 2019).

The law also contains provisions related to marine mortgages, including how to register them, as well as seizing ships due to marine debts, and details of their release against a guarantee. These include provisions related to judicial seizure and sale of ships, and the liability and limits of ship owners and managers. The new regulation also covers the authority and duties of the captain of the ship and the rights and obligations of the freight forwarders and shop agent (CML, 2019).

Furthermore, the law set requirements for maritime contracts, including the contracts for ship crew, passenger transportation, charter parties and the transportation of cargo by sea under bills of lading. The law provides procedures for filing claims and arbitration agreements. Moreover, the new law contains provisions relating to marine insurance contracts that cover vessel and cargo liability. In addition to, a whole of maritime issues are dealt by the new commercial maritime law which includes pilotage, towing, salvage, accidents and marine pollution. Aside from that, under the new law, the ship can be arrested for a precautionary measure, and this will also help the creditors to track down and arrest ships in the Kingdom of Saudi Arabia to secure and implement their maritime claims (CML, 2019).

1.5 Research objectives and Methodology

The study analysis flag state implementation of IMO convention by Saudi Arabia with reference to the criteria of flag state obligations as laid down in the III Code. For this purpose, the study will look at the flag state implementation of MARPOL as a model or example with a view to assessing the extent to which Saudi Arabia has or not met the implementation requirement and to identify potential gaps

in the implementation and enforcement of this convention. Research objectives are the following:

- a) Assessing and reviewing the current level of implementation of MARPOL by Saudi Arabia in its capacity as a flag State.
- b) Identifying areas where Saudi Arabia may have difficulties in fully performing its obligations as a flag state.
- c) Consideration of recommendations to assist Saudi Arabia in implementing and complying with IMO instruments.

This research aims to shed light on some of the challenges that Saudi Arabia is facing on the technical and legislative level in relation to the implementation of MARPOL. It is also hoped that practical solutions may be developed in line with the Implementation of IMO Instruments Code (III Code).

This research is conducted as a qualitative analysis based on data obtained from the General Transport Authority, Saudi government websites, and information available at the country profile in the Global Integrated Shipping Information System (GISIS). One of the main data received from TGA and used in this research is from the mock audit report written by two IMO Consultants, Mr. Hemming Hindborg and Mr. Mourad Ghorbel in April 2019. The mock audit report was based on the advisory mission undertaken by the two IMO consultants, from 14 to 18 April 2019, to assist the maritime administration of Saudi Arabia in the process of preparing for an audit under the IMO Member State Audit Scheme and to conduct an audit and post-audit work to address findings from the audit. The Assessment of the maritime administration of Saudi Arabia carried out using the III Code as the standard, with the aim of identifying any gaps in the implementation and enforcement of the provisions of the mandatory IMO instruments to which Saudi Arabia is Party (Hindborg & Ghorbel, 2019). The executive summary from the written report is provided in the Appendix at the end of this research.

The purpose of the study is not to attempt a comprehensive discussion on all identified findings and observation described in the mock audit report. Owing to the time constraints and words limits for making this research. Therefore, the author focuses on analysing the flag state implementation of MARPOL convention.

The analysis covers some key requirements for the implementation of IMO convention by a flag state as set out in MARPOL, III code and relevant IMO documents. In addition, most of the data used in this research were taken from secondary academic sources, supported by official primary sources. Some published literature related to international maritime law, international law of the sea, and other relevant articles were examined for a comprehensive insight into the technical aspects of the flag state administrative functions. The data collected and analysed were processed using the qualitative analysis method in order to demonstrate discussion of the data relevant to the analysis.

2.0 Chapter Two

2.1 Flag State Duties and Responsibilities

MARPOL Convention encourages all flag States to take part in the process of implementing and enforcing international marine regulations and standards aimed at preventing marine pollution by both merchant and fishing vessels. The International Maritime Organization (IMO) and the United Nations Conventions on the Law of the Sea (LOSC or UNCLOS) nicknamed as the Constitution of the Oceans assign flag States several duties to control and manage their vessels (Zwinge, 2011). MARPOL, an International Convention for the Prevention of Pollution from Ships under IMO specifies duties and responsibilities for its member States. LOSC outlines several “generally accepted” international practices, procedures, and regulations observed by all flag States regardless of whether a flag State adopts the LOSC Convention or not (IMO, 2014). Even though most of these conventions are framed at the international level, ships are normally under the obligations and rights of their nationality States. “Ships themselves cannot incur responsibilities by international law as they are not subjects of international law. It is instead the flag State who bears the duty to comply with international law” (Zwinge, 2011, p. 298). This implies the main duty and responsibility of flag States is to control their ships. The flag State duties and responsibilities can be classified as technical, social, and administrative. Since the MARPOL Convention is focused on preventing pollution of the marine environment, the flag state duties and responsibilities outlined here are directly or indirectly related to MARPOL convention and measures of curbing marine pollution.

2.2 Flag state Administrative function

A flag State should frame an overall strategy to guide the fulfilment of international responsibilities and obligations. It should also create a mechanism of assessing if the laid-out strategies yield effective enforcement and implementation of international conventions. The flag States have the responsibility of constantly reviewing their strategies aimed at achieving, maintaining, and improving the performance and capability of IMO to control marine pollution (Julian, 2000). Given what has been said, Saudi Arabia has not developed and implemented an overall Strategy

covering all relevant stakeholders in the Maritime Administrations including flag, port and coastal State. The lack of documentation setting out the strategy, absence of continuous review and verification of the effectiveness of the State in respect of its international obligations and obscurity of accessing the overall organizational performance and capability are evidences that the Kingdom of Saudi Arabia is in a challenging position to fulfil its comprehensive obligations and responsibilities contained in the mandatory IMO instruments to which it is a party (Hindborg & Ghorbel, 2019). According to the III Code a State should "develop an overall strategy to ensure that its international obligations and responsibilities as a flag, port and coastal State are met" in addition to creating a methodology for monitoring and evaluating that the strategy attain the successful implementation and compliance of applicable international mandatory instruments (IMO, 2013). Moreover, one of the critical issues was the unavailability of reliable records and there are no documented procedures for handling of records (Hindborg & Ghorbel, 2019). Also based on the interview conducted with TGA employees, it was found that TGA did not have a clear number of how many ships carrying the Saudi flag and requests IMO to provide them with this information. The III Code advice that "records should remain legible, readily identifiable and retrievable. A documented procedure should be established to define the controls needed for the identification, storage, protection, retrieval, retention time and disposition of records" (IMO, 2013).

The approach of implementing mandatory IMO instruments such as the "generally accepted" conventions is outlined in III Code. Part 2 of III Code states that if a flag State is a party to a certain convention, then the State should implement policies required in implementing and enforcing safety protocols and pollution prevention conventions through national legislation. In other words, a State should create a clear legal framework of assigning such responsibilities to the national maritime agencies. In this context, the essence of national policies is to define principles of supporting consistent governance and avoiding substandard performance. Note that international instruments such as conventions only establish standards maritime operations, but it is the responsibility of flag State's national government to create necessary guidelines required in enforcing standards stipulated in the international instruments (Hosanee, 2008). For example, if an international instrument orders its Member States to investigate accidents, it is upon the flag State to specify

the qualifications of a suitable investigator, reporting requirements, and training intervals for investigators. Here we are talking about building qualified MARAD personnel in marine safety and environmental protection activities. Saudi Arabia should implement a documented system for personnel qualification and continuous updating of their knowledge in proportion to the tasks they are authorized to perform. Among the positive indications is that the state is keen to develop its human resources in the field of maritime activities by providing them with appropriate training through courses, seminars or scholarships to study abroad (TGA, 2019). However, maritime administration in Saudi Arabia like the TGA has not develop and implemented Quality Management System, such as the PDCA (Plan Do Check Act) method, to ensure monitoring, controlling and the improvements of its management (Hindborg & Ghorbel, 2019).

Quality Management aims to optimize the available capabilities and energies to achieve the highest levels of performance and administrative efficiency in order to provide high quality services. The need for change in government work methods has become more urgent, especially with the beginning of the new millennium, due to the rapid development in technology, the demographic intention of the workforce and the increasing emphasis on quality and flexibility in providing services to its beneficiaries (Mohamed, 2010). And that the growing awareness of the citizens has led to the demand for high-quality service levels and this demand is increasing day by day, which calls for the need to improve and develop the method of providing services, performing duties, simplifying procedures and providing services quickly, due to the consequent saving of time and cost of performance (Mohamed, 2010).

The era of openness and globalization that characterizes our world today and the consequent inevitability of change and the transition to the more open and flexible democratic and participatory pattern, has become a topic of interest by various successful government entities in order to achieve the following goals:

- Ensuring the achievement of good performance of services.

- Ensuring the achievement of reliability in the various services provided.
- Achieving conformance of the service provided with the expectations of the beneficiaries before they receive it.
- Achieving technical and aesthetic characteristics in government agencies such as appearance and elegance.
- Creating a good image and reputation about the performance of government agencies for their functions towards their beneficiaries.

To achieve these goals, the maritime administration should focus on efficient design of the jobs and activities that the institution or department provides, and the focus should also be on simplifying procedures for providing services to beneficiaries. In addition, there must be sound standards for government services and duties in order to compare the actual performance of services with such criteria to identify deviations in performance. Finally, maritime administration should pay attention to the corrective measures in the event of such deviations, especially the negative ones.

In order for the concerned government department to apply the principles of quality to its services, it is imperative to follow the continuous development of employees, to periodically review the description of jobs and the tasks assigned to them, to focus on the decision-making process, to review and develop it, and to always focus on meeting their duties. The senior management of government administration must take into account the importance of developing and training its employees and encouraging them to participate in developing strategies and making decisions that pertain to the concerned government agency (Mohamed, 2010).

Additionally, in this context the III Code outlines the need for a flag state to avail processes and resources necessary in the administration of environmental protection and safety programs (IMO, 2013). In this case, resources may include administrative instructions for disseminating interpretative national regulations and implementing international regulations. Also, a flag State may establish an inspection and audit program perhaps an independent body to foster compliance international

instrument requirements. There should be a framework defining the scope of investigating deficiencies like delayed handling of cases and casualties. Through national legislation, a flag State is required to develop, document, and provide guidance of fulfilling international instruments in a manner that is suitable and appropriate for the State (Hosanee, 2008). Instructions and well-framed procedures are the main resources needed by administrative staff, ship owners, and ROs in executing their assigned duties. The administration should allocate resources in accordance with actual development needs and at the same time analyse the specific areas of expertise in which implementation personnel requires further and regular training. Therefore, if a flag State is a party to a certain international instrument, it is supposed to assign its national maritime administrative agencies like port authority with the responsibilities of revising and updating relevant policies. Also, it is important to evaluate implications and potential consequences if a State is not a party to certain international instruments. For example, if a State is not a party to the MARPOL convention, it is important to analyse if such a decision translates to increased marine pollution.

Finally, it is recommended for TGA, which assigned to perform the flag state duties, to establish implementation and enforcement guidelines to achieve successful implementation and compliance of IMO instruments. The guideline should include the following four main elements. First, the guideline should specify measures undertaken in ratifying and implementing international instruments. Secondly, the guideline should stipulate a procedural national legislative process to be followed in adopting an international instrument. Once the instrument is adopted, the implementation guideline should also include procedures of drafting and enacting policies to support its implementation. Lastly, the guidance outlines how communications with relevant stakeholders like ROs, owners, and IMO are done (Hosanee, 2008).

2.3 MARPOL Convention

The establishment of the International Maritime Organization coincided with a period that witnessed a tremendous change in maritime transport in the world. Since its emergence, the organization has been busy developing new instruments and updating existing instruments to ensure that they keep pace with the technical

development in maritime work. Among the important instruments, MARPOL convention comes at the top of the list.

The year 1973 witnessed the adoption of the International Convention for the Prevention of Pollution by Ships which was subsequently amended by the 1978 Protocol. Therefore, the convention is commonly referred to as MARPOL 73/78. The Convention and Protocol came into force on 2 October 1983. Subsequently, the Convention Amendment Protocol was adopted in 1997 after that a new Annex VI has been added to the convention which came into force on 19 May 2005. MARPOL has been revised with amendments over the years (IMO, n.d.).

The convention currently consists of six technical annexes, which include provisions aimed at preventing and reducing pollution from ships (pollution from both accidents or due to routine operational operations). Most annexes have designated special discharge areas with strict controls on discharges. Annex I related to the provisions for the prevention of pollution by oil and came into force on 2 October 1983. The Annex I cover the prevention of oil source pollutions by Both from operational measures and accidental discharges. The amendments, which were added to this Annex in 1992, made it necessary for new oil tankers to be built with double-hull and set a gradual timetable for ships operating to meet the requirements of the double hull, which was subsequently amended in 2001 and 2003. Annex II, which came into force simultaneously with Annex I, provide regulations to control of pollution by Noxious Liquid Substances (NLS) in bulk. It demonstrates discharge standards and measures to control pollution from NLS transported in large quantities. Some 250 items have been named and included in a regulation attached to the convention. The residues of these substances are allowed to be discharged in waste reception facilities only after compliance with certain considerations and conditions (relating to the type of substance discharged). Regardless, waste containing noxious substances is not permitted to be discharged within 12 miles of the nearest land (IMO, n.d.). Annex III, which came into force on 1 July 1992, contains regulations for the prevention of pollution by harmful substances in packaged form. Annexe IV, which

came into force on 27 September 2003, contain regulations for the prevention of pollution by sewage from ships. Sewage water discharges into the sea are prohibited, except when the vessel contains an approved sewage treatment plant, or when the vessel discharges disintegrated and disinfected sewage using the approved system over a distance of more than three nautical miles (IMO, n.d.). Annex V came into force on 31 December 1988 with the regulation for prevention of pollution by garbage from ships. Annex V place requirements and procedures for the disposal of various types of waste and determines the distance from the land in which it can be disposed of and prohibit the dumping of all kinds of plastic into the sea. The last Annex of MARPOL is Annex VI, which came into force on 19 May 2005, provide regulation for the prevention of air pollution from ships. The Annex introduces regulation to limit the primary air pollutants contained in ships exhaust gas, including sulphur oxides (SO_x) and nitrous oxides (NO_x), and prohibits deliberate emissions of ozone-depleting substances (ODS). MARPOL Annex VI also regulates shipboard incineration and the emissions of volatile organic compounds (VOC) from tankers (Kantharia, 2019).

The MARPOL convention gives flag states the responsibility of protecting the marine environment from pollution especially by merchant and fishing ships. “MARPOL 73/78 also seeks to reduce vessel pollution by requiring that ships be specially designed or reconfigured so as to eliminate or reduce operational pollution” (Griffin, 1994, p. 496).

The Annexes I and II of MARPOL are mandatory and each requires flag States to prevent pollution of the marine environment through harmful liquid substances such as noxious and oil (IMO, 2014). Article 211 of LOSC gives flag States the responsibility of establishing international standards and rules concerning vessel-source pollution. The scope of “harmful substances” addressed by MARPOL is quite indefinite but can be described as all substances potentially capable of harming marine life, cause hazards to human health and reduce the natural use of the marine environment (Julian, 2000). Since a flag State is held responsible for preventing ships flying its flag from polluting the marine environment, it is the duty of the flag State to

facilitate the training of ship personnel concerning safe disposal of harmful wastes and availing shipping equipment meeting standards of IMO. Additionally, MARPOL encourages flag States to report all forms of MARPOL violation by any ship (including foreign ships). The protection of maritime pollution by merchant's vessels is a collective duty for all flag States (Griffin, 1994).

It is the duty of flag States to survey, inspect and audit ships. "MARPOL 73/78 requires that ships meet various technical standards. Responsibility for seeing that these standards are met lies with the various flag States" (Griffin, 1994, p. 489). A flag State is expected to investigate pollution incidences, casualties, collisions, and thereafter document and communicate measures of preventing similar incidences from reoccurring. Therefore, to ensure flag States meet their responsibility for surveying and monitoring ships is fulfilled, they should hire qualified flag State surveyors and establish training programs for such personnel. Also, the flag State is supposed to create a framework and guideline for conducting such surveys.

2.3.1 Ratification of MARPOL

In the context of international maritime instruments, ratification describes a situation whereby a country enters a formal agreement to be bound by one or more of such instruments (Julian, 2000). After ratification, the ships owned by the ratified country or State must comply with the instrument. None of the commercial ships approaching the shore of the ratified State is entitled to favourable treatment and excluded from compliance. The ratification process requires signature, approval, acceptance, and accession. The Kingdom of Saudi Arabia agreed to join the MARPOL convention, including all its annexes and protocol 1997 based on the royal decree No. M/33 on 19 July 2004 (UQN, 2018). Subsequently, the Kingdom deposited the instruments of accession to IMO on 23 May 2005 (Al-Suwailem, n.d.). Ratification or accession to the convention is not just a way of creating the impression that a country has good intentions of protecting the marine environment. Saudi Arabia is under obligation to promulgate regulations, decrees, laws, and orders besides undertaking any other action required to achieve objectives of the convention (Syafiuddin, 2016).

2.3.2 National legislative process

Legislation relates to the drafting and implementation of a law by a legislative body via the legislative process. There are two tier system of legislation in Saudi Arabia that is; primary legislation and secondary legislation. Primary legislation in Saudi Arabia entails Statutes, Royal Decree, and Council of Ministries resolution while secondary legislation entails Executive regulations, Circulars, regulations, or any other regulatory issuance. Primary legislation is created by the legislative body and secondary legislation is executed by government agencies like Transport General Authority or Saudi Port Authorities (Ansary, 2008).

The Primary legislative process take place at high governmental level when there is a new statutory law proposed or a request to join and implementing an international treaty. The legislative body in Saudi Arabia is consist of the King and the Council of Ministry and the Shura Council. Normally, the legislative process undergoes multiple steps start with proposing and preparation and end with the publication in the official gazette (Ansary, 2008).

The Council of Ministries is presided over by the king and exercises both administrative and legislative function at the same time as mentioned in article 1 of the Council of Ministers Law (CML, 1993) .The law empowers the minister with the right to propose a draft law in relation to the work of his ministry. The other members of the council (ministers) also have the right to do so as stated in article 22 " Each minister shall have the right to propose a draft law or regulation related to the affairs of his ministry. Each member of the Council of Ministers shall have the right to propose issues of interest to be discussed by the Council upon the approval of the President of the Council of Ministers. " (CML, 1993). In addition, the Law also authorizes the Shura Council to propose a new draft law or amendment to existing law according to article 23 of Shura Council Law (SCL, 1992). If the draft Law is accepted, it will be referred to the competent authorities in both Councils to study it and submit a report on it to the Council of Ministries. At this point, there can be two scenarios: The first situation: if the council of ministries viewpoint agrees with the Shura

Council's view, then the proposed law can move to the next step. The second situation: if the two councils' views differ, so it is up to the king (the Chair of the council of Ministries) to decide what it will do about it according to article 17 of Shura Council law (SCL, 1992) .

The Second step of the legislative process is the discussion and voting stage. After submitting the report to the Council of Ministers, it begins to carry out its work as a legislative body and reviews the report and discusses it article by article, then the council votes on it, and after approval, it is referred to the royal court to be endorsed, but if the council rejects it, then the matter is deemed finished and the submitted draft law is preserved.

The third step would be the approval of the new law, in this stage, the draft law is presented to the king to obtain his approval. the approval of law proposals and amendments shall not be deemed final unless approved by the King in his role as the chair of Council of Ministries as per article 7 " The resolutions of the Council of Ministers shall become final upon the King's approval ".

the forth step of the legislative process is the issuance of the law by a royal decree according to article 20 of Council of Ministries law, as it emphasize that any Laws, international treaties, and concessions must be issued and amended by royal decrees upon review by the Council of Ministers (CML, 1993). The final step is the publication of the new law in the official gazette as stipulated in article 23 and 71 of the Council of Ministries Law (CML, 1993).

The ratification or accession of international treaty follow the same concept as introducing a new law. When a government entity wants the country to join an international treaty, the concerned Ministry or Authority submit an application to join or ratify a treaty to the Council of Ministers. The application need to be supported by the reasons for ratification or accession to a treaty with a summary of its most important provisions and obligations, list of countries that have signed, ratified or acceded to it, the views and comments of the concerned entity on the treaty and an accurate translation of the treaty if it is not in Arabic. Then, the Council of Ministers

will conduct an initial appraisal for joining the international treaty and if the Council approves it, it will be sent to the Bureau of Experts for reviewing and judge if it would have achieve its purpose. If so, the Bureau submits its views and decision to the Shura Council, which determines whether it is compatible with Saudi Arabia's local and international policies. The Shura Council then sends the proposal for joining the international treaty for final approval to the Council of Ministers, which then submits it to the King for his consent. Finally, after the King approval and issuance of a royal decree to join the treaty, the concerned government entity which made the proposal for joining the treaty must promulgate it into the national legislation by issuing executive regulations for its implementation. It is necessary to remember that in the course of enacting such law, the statutory authority must take into account the new regulations do not interfere with the plain text of the Qur'an or authentic Sunnah. These are the Kingdom's rules, which take priority above all such laws in Saudi Arabia (Ansary, 2008).

2.3.3 National legislation of international maritime instruments

National legislation of international maritime instruments implies “the parties to the Convention undertake to give the effect to the provisions of the Convention...” (IMO, 2014). The IMO Member States are required to integrate international maritime treaties into their national legislation. In this case, States are expected to implement and enforce IMO instruments; that is; conventions, codes, amendments, and protocols besides adopting its provisions into its national legislation (IMO, 2013).

The legislative process involves seven sequential steps starting with studying the convention and its applicability. This can be achieved through identifying obligations or implications of being a Party to the convention, assessing the availability of the necessary resources, training needs, and manpower, preparing recommendations, and seeking approval from the management to launch the accession process (IMO, 2013). The second stage of the legislation process involves accession and implementation of the plan. During accession and implementation, relevant

measures include forming a working group, scheduling preparatory work, ascertain the most appropriate type of legislation depending on existing parameters and obtaining approval for the implementation plan. The third stage involves consultation with stakeholders to be affected directly or indirectly by the convention. The fourth stage of the legislation process is the approval of the convention by legislative body authority and assigning duties to relevant government entities. The next stage involves preparing draft legislation, preparing legislation for promulgation, obtaining bills, in case of Saudi Arabia would be obtaining royal decrees, where necessary and bringing the legislation into force. The sixth stage entails preparing instruments of accession, depositing instruments of accession and creating mandatory reports for IMO (IMO, 2013). The last legislative process is creating notifications and seminars perhaps through circulars and seminars. Internal briefings for the relevant personnel and authorities can be conducted.

By looking at the steps taking by Saudi Arabia to apply the MARPOL convention. There was a clear evidence that shows the State has not follow the correct path to enforce this convention. First of all, the accession to the convention took place after approving it by a royal decree No m/33 on 19 July 2004 and depositing the instrument of accession on 23 May 2005. However, the provisions of the convention has not been implemented and enforced through appropriate national legislation and provided by the necessary implementation and enforcement infrastructure, in addition the royal decree was not found published in the official gazette. (NCAR, 2018). There were no procedures, instructions or guidelines developed and implemented until 13 years later when the maritime administration become part of the Transport General Authority (UQN, 2018). During 2018, TGA began building its maritime regulatory framework substantially based on the authority granted to it under the TGA Statute to create secondary legislations including proposing public policies and legislation on public transport, and overseeing their implementation after approval as stipulated in Article 4 (TGAS, 2013). Furthermore, the Statute grant the President of TGA flexibility to Issue the necessary decisions to implement the provisions of the Statute, the regulations issued accordingly, and the approved rules and procedures as per

Article 10 of TGA Statute (TGAS, 2013). Most importantly, and as seen in the table below, TGA has recently adopted Executive Regulations, which are set of rules, to implement provisions of the following conventions (Mahayni, 2018).

Table 2 The Executive Regulations issued by TGA.

CONVENTION	Adopted by Transport General Authority	DATE OF PUBLICATION IN THE SAUDI OFFICIAL GAZETTE
the International Convention for the Prevention of Pollution from Ships for the year 1973 and its amendments for the year 1978 and 1997	Resolution No. 07177 on 2/10/2018	02/11/2018
International Convention on Tonnage Measurement of Ships (1969)	Resolution No. 07176 dated 02/10/2018	02/11/2018
Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW, 1978)	Resolution No. 07178 dated 02/10/2018	09/11/2018
International Convention on Load Lines (1966)	Resolution No. 07179 dated 02/10/2018	26/10/2018
International Convention for the Safety of Life at Sea (SOLAS, 1974)	Resolution No. 07181 dated 02/10/2018	26/10/2018
Convention on the International Regulations	Resolution No. 07182 dated 02/10/2018	2/11/2018

for Preventing Collisions at Sea (COLREGs, 1972)		
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Source: (TGA, 2019)

Moreover, despite the remarkable efforts done by TGA to promulgate IMO instruments into the national legislation, Saudi Arabia has not implemented all the required policies (procedures) through national legislation and guidance to assist in the implementation and enforcement of the requirements of the IMO Conventions (Hindborg & Ghorbel, 2019). In addition, the latest amendments to the MARPOL, SOLAS, Load Line and the Tonnage Conventions has not been promulgated into national legislation (Hindborg & Ghorbel, 2019). One aspect of legislating maritime conventions is the review of existing legislation. National governments of each flag State should be actively involved following amendments of the international instruments. The governments need to participate actively in understanding, tracking, and monitoring marine issues as guided by IMO. National legislation gives a flag State enough power to enforce international instruments among its ships and within its marine territories. Before conventions are enacted at the national government level, the necessary preparatory work on legislation should be done (IMO, 2013).

2.3.4 Saudi Executive Regulations of MARPOL

The Executive Regulations, issued by the Transport General Authority in 2018, give a legal basis for the enforcement and implementation of MARPOL convention and it consist of nine chapters (shown in the below table), ninety-eight articles and sixty pages (UQN, 2018). Moreover, as per article 4, the Executive Regulations apply to all ships flying the Saudi flag wherever they are, and foreign ships while they are in the territorial waters of the Kingdom. However, warship, naval auxiliary or other ship owned or operated by a State and used are excluded from the scope of application. It also stipulated in article 2 that "Ships flying the flag of the Kingdom as well as foreign vessels when they are in the kingdom's territorial waters are obliged to comply with the provisions of the MARPOL convention and to take the necessary measures to prevent pollution of the marine environment resulting from the discharge of

contaminated materials in violation of the Convention." (translated by the author) (UQN, 2018).

Table 3 Titles of the Executive Regulations of MARPOL chapters

Chapter one	General Provisions
<i>Chapter Two</i>	Prevention of Pollution by Oil
<i>Chapter Three</i>	the Control of Pollution by Noxious Liquid Substances
<i>Chapter Four</i>	Harmful Substances Carried in Sea in Packaged Form
<i>Chapter Five</i>	Prevention of Pollution by Sewage from Ships
<i>Chapter Six</i>	Prevention of Pollution by Garbage from Ships
<i>Chapter Seven</i>	Prevention of Air Pollution from Ships
Chapter Eight	Penalties
Chapter Nine	Final Provisions

Source: (UQN, 2018)

The Executive Regulations is not a very detailed document, nor does it provide an interpretation of MARPOL provisions. In general, the Executive Regulations is nothing but a combination of a translation of the text of the convention to the Arabic language and provide a direct reference to a provision in the convention. Despite that, Chapter 8 of the Executive Regulations specified penalties for non-compliant ships. The penalties are in the form of financial fines and/or the withdrawal of the vessel's Certificate of Registry or Navigation license. Article 89 identified 30 violations, for the infringements of the Executive regulations, with fines ranging from 10 thousand to 50 thousand Saudi Riyals. Moreover, the executive regulation does not provide the flag state control officer with the legal basis to detain a ship violating MAROL provisions.

Previously, the Executive Regulations of The Law of seaports, harbours and marine lighthouses that has been enacted in 1975 and amended by Ministerial Resolution No. 42 of 1986, dose contain legal basis for both flag state control officer and port state control officer to carry out inspection onboard Saudi vessels or foreign

vessels visiting the ports of Saudi Arabia and detain them in case of non-compliance with the national law and regulations (NCAR, 1975). Nevertheless, when the new Commercial Maritime Law Came into force in 2019, the Law of seaports, harbours and marine lighthouses was repealed as stated in article 391 of the CML, and this law and its executive regulations became null and void and it has not be replaced by another regulations (CML, 2019). This is a serious problem and Saudi Arabia needs to take immediate measures to implement the flag and port state control in national legislation to give it legal effect.

Enforcement officers are empowered by national legislation to board and inspect ships and their equipment. “If this obligatory investigation turns up sufficient evidence to bring an action against the vessel, then the flag state must initiate a legal proceeding to judge the matter” (Griffin, 1994, p. 502). When a ship fails to meet certain critical requirements, the officer may order the ship to be detained. Such officers have the authority to request certificates and relevant documents of crew members. The officers can request ships to be directed into docks for the hull to be surveyed. If investigations suggest that crews, operators or owners of ships have infringed national laws, the flag State is supposed to institute proceedings and where appropriate apply penalties to deter similar violations. Flag State should establish programs for controlling and monitoring the adoption of international instruments. Marine law enforcement officers are usually involved in fostering compliance. Every incidence of violation implies tougher measures should be introduced to cover the previous gap which led to the reported violation of regulations.

The scope of provisions enforced is not limited within maritime regulations and laws but may extend to other criminal or civil law statutes. There are enforcement actions considered as the responsibility of other government entities not directly involved in the audit. The national maritime authority should be actively involved in collecting and providing informative reports to enforcement agencies (IMO, 2013).

Not all breaches to statutory requirements necessitate persecution, especially where violations are accidental. There should be a threshold defining circumstances

under which non-compliance calls for persecution. Also, the persecution action depends on the nature of the non-compliance and circumstances leading to the violations. Actions involved in implementing and enforcing MARPOL 73/78 include effecting all Annexes of the convention accepted through national legislation, prohibiting violations, providing sanctions, taking proceedings, informing concerned parties like IMO, inspecting ships, monitoring compliance, avoiding the unnecessary delay of ships, reporting incidences, providing IMO with documents as per Article 11, investigating pollution incidences and enhancing the adequate provision of reception facilities (Julian, 2000).

2.4 Flag state duties mandated by MARPOL

2.4.1 Flag state inspection

Beside building up the regulatory framework and promulgation of the MARPOL convention into the national legislation, there are functions that come under the flag state. First, monitoring and enforcing standards of safety and pollution prevention on all vessels under its jurisdiction through a survey and inspection regime in accordance with domestic and international regulations, in addition to enforce standards of competency amongst seafarers. Under the provisions of MARPOL Annex I regulation 6, Annex II regulation 8, Annex IV regulation 4, Annex VI regulation 5, The survey and inspection of ships shall be carried out by officers of the flag authority. However, the flag authority can entrust inspections and surveys either to surveyors nominated for the purpose or to organizations recognized by it (Kantharia, 2019).

Saudi Ports Authority has been carrying out inspections on board Saudi Arabia flag ships calling all ports in Saudi Arabia since year 2000. Nevertheless, Both the Transport General Authority and the Saudi Ports Authority has employed a number of flag State surveyors/Inspectors to carry out surveys on board its ships trading domestic (Hindborg & Ghorbel, 2019). Moreover, according to the mock audit report, It could not be verified when and how the flag State surveys/inspections were organized, initiated and divided between the two Government entities (Hindborg & Ghorbel, 2019). Despite the unclear division of responsibilities within the Maritime

Administration, the Port Authority sends a copy of the inspection report for a Saudi flagged ship to the Transport General Authority. According to III code, in order for the flag state to carry out its responsibilities and obligations effectively, it should " assign responsibilities within their Administrations to update and revise any relevant policies adopted, as necessary." (IMO, 2013, p. 6). It should also be noted that SPA has announced the adoption of the instructions for inspection Saudi ships and the instructions for inspection of foreign ships in 2019 (SPA, 2019, p. 76). Furthermore, both authorities never carry out surveys on Saudi flag ships outside ports of Saudi Arabia (Hindborg & Ghorbel, 2019).

Flag States are required to conduct inspections in the systematic approach (Hosanee, 2008). All ships must be inspected regularly, perhaps once a year. A flag State is responsible for maintaining fleet ranking whereby the frequency of inspections within a particular period partly relies on the fleet ranking. In addition to the regular inspections which only occur on predetermined periods, a flag State is required to undertake a thorough inspection immediately issues of poor performance like PSC detention (IMO, 2013). However, if the poor performance coincides with regular; that is; in the same time frame with regular inspections, the flag State does not need to conduct two separate inspections. An effective flag State inspection calls for the analysis of various reports by the support staff, commensuration of the fleet size by surveyors. Performance monitoring authority may be implemented in situations where performance rating systems are available. Deficiencies of ships may be reported through flag State inspections, port state control, recognized organizations, or reported by the ship's crew. For timely handling of deficiencies to be achieved, deployed staff should be technically qualified and commensurate by number in order to analyse all the incoming reports. Reliable technical decisions making requires the availability of qualified flag State inspectors.

2.4.2 Flag state investigation

In May 2020 TGA enacted the Regulations for the Investigation of Accidents that comply with the Casualty Investigation Code (MSC.255(84) adopted on 16 May 2008) (TGA, 2020). The authority also launched the Office of Maritime Accident

investigation, and during the inauguration the members of the Maritime Accident Investigation And technical committee supported by the relevant government and private entities were accredited (TGA, 2020). This regulation aims to establish the necessary frameworks for the investigation of marine accidents and events in accordance with the requirements of safety and protection of the marine environment and to indicate the causes of their occurrence and the circumstances surrounding the accident and the event and the contributing factors in order to avoid them in the future. Regardless of the delay in issuing this regulation, it is considered a good addition to the national initiatives and measures that help Saudi Arabia to perform its duties as a flag state.

2.4.3 Flag State Surveying and Certification

Saudi Arabia has delegated all statutory surveys and issuance of statutory certification, with the exception of the Minimum Safe Manning Certificate, to the Recognized Organizations that has been authorized by TGA (Hindborg & Ghorbel, 2019). The delegation of authority will be discussed further in chapter three.

2.5 Mandatory Reporting Requirement to the IMO

It is the duty of the flag State to inform the International Maritime Organization about the flag's compliance with the established conventions. The organisation rely on such reports to their policy-making processes aimed at encouraging the adoption of the MARPOL conventions (Julian, 2000).

MARPOL being a convention of IMO, flag States subject to MARPOL ought to file periodic reports to inform the oversight organization about the extent to which the ships comply with the regulations and at the same time offer suggestions for improvement (Julian, 2000). IMO needs such reports to assess the implementation of its conventions. MARPOL Article 12 states that "each Party to the Convention undertakes to supply the Organization with information concerning the findings of such investigation, when it judges that such information may assist in determining what changes in the present Convention might be desirable" (Julian, 2000, p. 14). IMO uses such reports to make informed decisions. According to Article 94 of UNCLOS,

if a State observes a violation of international conventions with respect to a ship, the State can report to the concerned flag state, and thereafter the flag State is expected to take appropriate measures to remedy the situation (IMO, 2014).

2.5.1 Mandatory Reporting Requirement under MARPOL

Articles 8, 11, and 12 of the International Convention for the Prevention of Pollution from Ships outline reporting duties of flag States under MARPOL.

Article 11 of MARPOL specifically talk about the Communication of information to IMO. the following table show which information has been communicated to the IMO under article requirements:

Table 4 Mandatory Reporting Requirement under MARPOL

Type of information	Communication by Saudi Arabia to IMO	REFERENCE
Promulgation of the provisions of MARPOL into national legislation	The State did not communicate its National Maritime Legislation	Country profile in GISIS. The Mock Audit Report.
a list of non-governmental agencies which are authorized to act on their behalf	Yes communicated	Country profile in GISIS
specimens of their certificates issued under the provisions of the regulations	Yes communicated	Country profile in GISIS
a list of reception facilities	The State did not establish reception facilities in its ports as required by MARPOL Annexes I, II, IV, V and VI.	Country profile in GISIS. The Mock Audit Report.
official reports or summaries of official	No communication	The Mock Audit Report.

reports in so far as they show the results of the application of the present Convention		
an annual statistical report of penalties actually imposed for infringement of the present Convention	No communication	The Mock Audit Report.

Source: The Mock Audit Report (Hindborg & Ghorbel, 2019) and Saudi Arabia profile at GISIS.

In addition, according to IMO Circular MEPC (318) flag state are required to submit their annual reports by the end of September of each year (IMO, 1996). The reporting should be done within the shortest time possible (Julian, 2000). The reports cover several aspects of interest including information about casualty investigations. To provide such reports, flag States ought to conduct investigations concerning “serious accidents” such that measures are introduced to prevent similar accidents. For example, the reports may be used to frame new sailing rules. According to MARPOL Article 11, Saudi Arabia is obliged to inform the organization about the laws promulgated and an annual statistical report (Julian, 2000).

3.0 Chapter Three

3.1 Recognised Organisation

Classification societies are the organizations that set and apply technical standards for the design, construction and inspection of ships and which conduct inspections and surveys on board. Flag states can authorize classification societies to act on their behalf to conduct statutory surveying and certification work for their ships in accordance with the rules of the classification society, the requirements of that country and the international treaty the country party at (EMSA, 2020).

The delegation of the authority to a classification society can be a full or partial delegation. The classification society, based in the type of delegation, lay down technical rules on the basis of research and experience, confirm that designs and calculations comply with these rules, survey ships and structures during the construction and commissioning process, and regularly survey vessels to ensure that they continue to comply with the rules. Classification societies are also responsible for classing offshore platforms, such as oil offshore platform, and submarines. This survey process covers diesel engines, important shipboard pumps and other vital machinery. Issuing all statutory certificates of the ship, depending on the type of delegation. Classification societies are also responsible for classifying oil platforms, other offshore structures, and submarines. This survey covers diesel engines, important ship pumps, and other essential machinery (IACS, 2004).

3.1.1The International Association of Classification Societies (IACS)

IACS is a non-governmental organization that consist of elite classification societies, currently twelve members, that operate with an almost uniform classification standard and cooperate with each other by exchanging information and development and managing the training institutes of the association in accordance with memorandums of understanding among themselves. Notwithstanding the fact that IACS is a non-governmental body, it also had something to do within the International Maritime Organization (IMO), for which IACS provides technical support and guidance and establishes unified interpretations of international legislation established

by the Member States of the IMO (IACS, 2004). Upon adopted, these interpretations shall be implemented by each IACS members to certify conformity with the statutory requirements on behalf of the flag State Authorizing. The association has consultative status with the IMO and is the only non-governmental body with observer status that also establishes and implements technical rules that represent the goals of the IMO conventions (IACS, 2020).

3.2 Saudi Arabia Requirements for Delegating Authority to a Classification Society

According to the Ministerial resolution No. (147) on 03 July 1985 (NCAR, 1985), concerning the Regulations for organizing the work of non-governmental international supervision and classification societies mandated to carry out inspection and examination work for Saudi ships and issue certificates, Saudi Arabia has set the following conditions that must be met, as a minimum, by the classification society to carry out survey and inspection work for Saudi ships on behalf of the Kingdom's government, and these conditions are:

1. The society must be a full member of the IACS.
2. The number of years of practicing work for the society shall not be less than 50 years in the following areas: Classification of ships of all types, tonnage and areas of work, classification of off- shore facilities, reviewing design of new ships and supervision of their construction.
3. The organizational structure of the society should include the following departments:
 - Research department to deal with all modern technologies.
 - Technical department for reviewing the survey report and inspection with the aim of verifying that all necessary survey works for manufactured ships have been carried out under the society's supervision and at their specified dates.
 - Consulting Services department.
4. The classification society shall be recognized by at least 50 countries.

5. The number of dispersed surveyors working for the classification society should not be less than 1000 surveyors, and the number of engineers working at the head office should be within the limits of at least 500 engineers.
6. The number of the classification society branch offices in the various ports of the world should not be less than 200 offices.
7. The size of the fleet classified by the society shall not be less than 15 million gross tonnage.

Saudi Arabia delegated the authority for statutory survey and certification to Six classification society which are:

- The American Bureau of Shipping (ABS).
- The Bureau Veritas (BV).
- The Lloyd's Register (LR).
- Det Norske Veritas and Germanischer Lloyd (DNV-GL).
- The Nippon Kaiji Kyokai (NKK).
- The REGISTRO ITALIANO NAVALE (RINA)

all the above classification society are members of IACS. The written agreements are held between the TGA and the ROs (GISIS, 2019).

3.2.1 Delegation of flag State responsibility to the RO

III code permits flag States to delegate the authority of manning ships to recognized organizations. Since some of the tasks require some level of expertise on maritime issues, it is suitable for the flag State to entrust surveys, certification processes, and inspections to recognized organizations and nominated surveyors. After delegation, the flag State has to notify IMO concerning the delegated responsibilities such that IMO is always aware of parties to be held accountable in case of deficiencies. RO Code outlines the process of authorizing RO to act on behalf of the Administration. In 2015, amendments of MARPOL made the RO Code mandatory. Part 1 of the RO Code requires communication of all relevant information including the scope and purpose of the delegation. To be precise, the flag State should provide IMO with details of the delegation. The second part of the RO Code outlines the authorization

and recognition requirements for the flag State and RO. Part 3 of the RO Code requires the flag State to oversee the performance of the recognized organization. “Administration remains fully responsible!” (Hosanee, 2008). In other words, the flag State should demand accountability from the RO.

Many flag States applied MARPOL Annex I Regulations and Annex II regulation 10 as a means of delegating certain responsibilities and duties to the recognized organizations (Syafiuddin, 2016). Delegation of such flag State duties and responsibilities is legitimate action and most of the flag States have opted to delegate their responsibility. IMO has established guidelines and procedures (RO code) to be observed by States in the event of delegating authority to ROs. Both RO and flag State entering into the agreement must portray effort of meeting the minimum level of performance as per the applicable conventions (Syafiuddin, 2016). In line with this argument, flag State is required to assess RO’s capacity and capability to undertake the delegated tasks in accordance with specified standards. It is important for a flag State to establish a legal framework of administering authorization perhaps through formal written agreement specifying the scope of responsibility delegation to the RO. According to the mock audit report, the TGA did not carry out an assessment of the RO before entering into an agreement. The Agreements with the RO’s did not contain the minimum requirements (Hindborg & Ghorbel, 2019).

Once the roles and responsibilities of flag States are delegated to the RO, the RO Code states that the flag State should evaluate qualifications of the RO’s technical skills and establish a training program as per the standards of IMO. The RO which assumes the duties and responsibilities of the IMO should be certified and provided with certain specifications of conducting surveys. Once the flag State enters into an agreement with RO, contractual agreements must be documented and included in reports filed to IMO. (IMO, 2013) Other requirements to be considered during the delegation of State’s responsibility to RO as per the III Code include knowledge of the staff, inspection or audit program, and supplementary surveys. The process of granting

recognized organizations the authority to conduct surveys and inspections should be as per requirements of the RO Code.

The scope of the RO Code is quite broad and includes issues relevant to States that are party to international instruments. The code applies to every flag State intending to delegate its duties and responsibilities as per international instrument to a recognized organization. Also, it applies to organizations recognized and certified by the flag States as capable of enhancing adherence to mandatory IMO instruments. The flag State should recognize the responsibilities played by RO otherwise it can overstep in the delegation process. Additionally, the flag States should be well informed on conditions it must adhere to in the event of authorizing ROs. RO Code outlines guidelines to be followed by flag States when playing an oversight role after delegation (Syafiuddin, 2016).

In part 1 of the RO Code under section 4 presents general requirements in the event of delegating authority to ROs. First, the organization to which the flag State delegates its authority must be recognized as a compliant of RO Code provisions. The scope of functions a flag State expects a RO to play on its behalf should be within the capabilities of the RO. A flag State may collaborate with other flag States with a similar objective of ensuring the RO adheres to RO Code's provision. Minimum specifications or obligations for suitable RO are stated in part 2 of the RO Code between section 2 and section 7 (Hosanee, 2008). Such specifications address aspects of competence, capacity, and capability of the RO. They include resources, ROs' general requirements, Management or organization, certification of quality management systems, performance measurement, and statutory specifications.

One of the minimum conditions for a RO to be authorized is independence. In other words, there should be no conflict of interest between RO and other parties. For example, the RO should not have an economic relationship with ship owners otherwise attempts to protect the shared economic benefits would affect its responsibility of fostering compliance with the MARPOL convention (Julian, 2000). Additionally, the RO should demonstrate good communication with the flag State and must use

exclusive surveyors. Its quality management system should be certified and well managed. Other conditions for authority delegation may be imposed during national legislation. For instance, the flag State may specify geographical coverage in which the RO would be expected to exercise its mandate. The flag State may demand ready or unrestricted access to reports and database of RO concerning operations of ships flying its flag. Since such extra conditions are not referenced from international instruments, the flag State and the RO should draft a formal agreement clarifying terms and conditions of the agreement (Hosanee, 2008).

Part 3 of the RO Code recommends several measures for the oversight of ROs (Julian, 2000). First, there should be a system of determining if the work done by RO meets all requirements. Saudi Arabia is required to establish an oversight program(s), auditing principles, control the established oversight programs (Hindborg & Ghorbel, 2019). The twentieth paragraph of III Code explains how a flag State would be expected to play its oversight role by establishing an oversight program (Hosanee, 2008). The flag State has to supervise all duties delegated to the recognized organization. The oversight program established by the flag State is expected to monitor and verify compliance. As a part of managing its oversight program, a flag State is expected to set objectives and the extent of the oversight role. Also, it is the responsibility of the flag State to avail necessary procedures and resources needed by the oversight organization to fulfil its mandate. The flag State has to monitor and review its oversight program. In the context of overseeing the performance of the ROs, possible monitoring activities are supplementary surveys, auditing of the ROs, periodic inspections, periodical dialogue sessions, observation of surveys, examining the PSC reports, follow-up of detentions orders made by the RO and reviewing audit reports. III Code uses the term “shall” when explaining the monitoring activities of a flag State over RO implying such oversight roles are mandatory. There are four indicators for flag State monitoring performance of an RO which include RO-related detentions, reporting requirements, RO-related marine casualties, and PSC detention ratios (Hosanee, 2008). In many cases, flag States tend to neglect their responsibility for controlling their ships. One of the reasons attributed to these incidences of under-

performance is inadequate capability and capacity of flag State resources (Syafiuddin, 2016).

3.2.2 Requirement of monitoring scheme of the RO

One of the fundamental aspects of the process of evaluating the effectiveness of authority delegation is ‘monitoring.’ Section 5.1 of the RO Code states that “The flag State should establish or participate in an oversight program with adequate resources for monitoring of, and communication with, its RO(s)...” (Syafiuddin, 2016, p. 21). In this case, monitoring is necessary to determine if RO performs the delegated tasks as per international standards.

Monitoring schemes for ROs are required because ROs are capable of performing both public and private functions besides the fact that the performance of RO is likely to affect the flag State’s performance. A classification society like RO may perform dual functions after obtaining authorization from the administration (Syafiuddin, 2016). For instance, consider a situation whereby RO is involved in class tasks of ship-owners (a private function) and as an extension of administration (a public function). There are contradictory perspectives concerning the dualism concept. On the one hand, classification societies hold the belief that the dualism concept creates an opportunity for better efficiency and simplicity in monitoring. Also, they argue that benefits are shared mutually. On the other hand, some experts are bothered by the potential simultaneous functioning of such classification societies something which might yield an unhealthy relationship. ROs may have “other business interests with ships registered in the flag State that has authorized such RO” (Syafiuddin, 2016, p. 22). Therefore, conflicts are likely to arise between commercial interests of RO as the ship surveyor and its performance as the flag State’s inspector.

Even if the flag States delegate their duties to ROs, the flag State is responsible for such delegation. In other words, the flag State is required to monitor the RO to which it has delegated its responsibilities. The aim of monitoring the RO is to ensure the contracted party does not neglect the assigned duties and responsibilities. Also, the

RO monitoring scheme serves to enforce standards set by international conventions (Hosanee, 2008).

Furthermore, flag State performance is highly dependent on the performance of the RO. Analysis of RO-related deficiencies shows that the level of RO performance is significantly affected by such deficiencies. “Evidence from different port State control activities indicates that a significant number of ships were detained or found with some deficiencies soon after being surveyed by the RO” (Syafiuddin, 2016, p. 23). Based on these arguments, the performance of RO can be maintained and improved by establishing a monitoring scheme for RO. Once the performance of RO is enhanced, the performance of the flag State is influenced positively

4.0 Chapter Four

4.1 Flag State Audit, Inspection and Survey

The difference between flag state audit, inspection and survey can be explained as follows. An audit is a management scheme like ISM or ISPS. For example, when the audit is performed according to the ISM code to verify whether the created system is functioning well, it is done by examining the records, procedures, and documents. The result of an audit is usually called a non-conformity. An inspection is a continuous process usually performed by port state flag state control to check if everything on board the vessel is currently functioning well. Inspectors may not only check the condition of the equipment but also the correct knowledge of the persons working on board. The result of the inspections is usually called deficiency. A survey focuses on ensuring that the vessel remains seaworthy in the future until the next survey. The survey is conducted by the relevant flag state or RO surveyors to obtain various certificates for the vessel. The result of the survey is generally certification or non-compliance.

In Saudi Arabia, the flag state inspection is carried out by the Saudi Ports Authority and surveying is conducted under the supervision of TGA. According to SPA, the number of flag state inspectors appointed during 2019 reached 48 (SPA, 2019). While the TGA has not announced the clear number of surveyors employed, it is delegating survey activities on bored vessels to RO (Hindborg & Ghorbel, 2019). It is worth to mention that TGA and SPA have not documented a formal training system and a program to train their surveyors and inspectors. The qualifications and training needs of the flag state surveyors have not been determined. The surveyor is certified based on an application that shows Certificate of Competency (CoC) (Hindborg & Ghorbel, 2019).

4.2 Flag State Surveyors

A flag State surveyor is described as the personnel charged with the duty of performing ISM audits, surveys, issuing certificates, and approving documents. To be precise, flag State surveyors are specialized surveyors who perform the flag State

surveys of their respective ships. They regularly board ships flying flags of their 'employer' State to carry out statutory surveys. Professionals involved in auditing company ISPS or ISM are also regarded as flag State surveyors (Schröder-Hinrichs, 2015). Flag State surveyors serve as technical managers for the flag State. Other duties in which flag State managers may engage in include granting exemptions, approval of ship documents, and analysis of oversight programs.

Part 2 of the III Code claims that the flag State/Administration is responsible for defining and documenting interrelation, authority, and responsibilities of the professionals involved in managing, performing, and verifying work on relevant issues like pollution prevention and safety enhancement (IMO, 2013). The same code outlines mandatory qualifications for the personnel to be trusted with the responsibility of performing audits, inspections and surveys. For instance, such personnel should present appropriate qualifications from nautical and marine institutions as well as seagoing experience. III Code requires all flag State surveyors to have more than three years of seagoing experience in either engine department or as an officer (IMO, 2013). Alternatively, the personnel seeking the position of flag State surveyor can submit an academic degree from a tertiary institution accredited by the flag State plus proof of at least three years of professional experience. In addition to all these aspects of qualifications, the flag State surveyor must practically demonstrate a sound knowledge of international instruments and ship operations.

Flag State surveyors are usually assisted by coordination staff and technical support that must be qualified as well. The flag State surveyor assistants must have the training, education, and supervision commensurate particularly in their areas of specialization (Hosanee, 2008). All other factors held constant, expertise with previous work experience should be preferred. If the recruited professionals lack previous seagoing experience, the Administration may initiate direct training through internal training courses and indirect training by allowing trainees to work in collaboration with experienced staff.

There are seven main training requirements for flag State surveyors and their assistants (Nordquist, 2011). First, the training programs should incorporate elements of knowledge of international regulations for ships and their crew. Secondly, the training must equip trainees with procedures needed in conducting casualty investigation, undertaking oversight functions, certification, survey, and control. The training should foster understanding of the rationale behind international instruments such that employees are motivated intrinsically to fulfill the regulations. For example, if the person operating fishing vessels understand marine pollution threatens marine life hence a low population of fish in the long-term, such personnel is likely to exercise precaution because of their interests to protect and sustain fishing activity. The training of flag State surveyors should cover both ashore and onboard processes. The Administration has to create job descriptions of their flag State surveyors, determine personal qualifications matching the job description, identify training needs, and implement the training programs.

Paragraph 35 of the III Code requires flag States to document the qualification system for its personnel and continuously update the system as required especially after the amendment of international instruments (Nordquist, 2011). In the event of evaluating and documenting staff qualifications, relevant content to be incorporated include educational background, professional experience prior to joining the flag State, authorization, training courses are undertaken and professional experience in the position of flag State surveyor.

The surveyors must be knowledgeable and qualified in order to achieve an objective and impartial survey. Effectiveness of maritime conventions relies on the role of flag State to successfully become a Party to the maritime convention, enacting supportive national legislation, implementing, enforcing, and filing compliance reports as required.

5.0 Chapter Five

5.1 Conclusion

The Kingdom of Saudi Arabia aims to strengthen and develop its registered fleet of ships in line with international standards for safety, protection of the marine environment and maritime security issued by the International Maritime Organization (IMO) (TGA, 2019). In order to reach this goal, the Kingdom must build the necessary infrastructure to perform its functions as a flag state and comply with the requirements of international treaties issued by IMO. Among this requirement is the effective implementation of the International Convention for the Prevention of Pollution from Ships (MARPOL). There are certain factors discussed in this research to review the flag state implantation of MARPOL in Saudi Arabia including, the regulatory framework, flag state administrative duties and functional structure for a maritime administration. Saudi Arabia has acceded to MARPOL convention in 2005 and incorporated it into the national legislation in 2018. However, the State did not provide additional interpretation, instructions, polices and guideline to assist in the implementation and enforcement of the requirements of the IMO Conventions. Furthermore, the latest amendments to MARPOL have not been promulgated into national legislation. In addition, to enhance the level of performance related to administrivia duties, the relevant Maritime Administration in the country must clearly define and documente the division of responsibilities as well as prepare the necessary legal basis, procedures, guidance, and instructions to support the staff performing all critical functions of the flag state responsibilities. Another important factor is that the Maritime Administration should establish procedures for the handling and maintain of records, communicating necessary information as required by applicable IMO instruments to IMO and develop monitoring and auditing programme to supervise ROs. Despite the negative indicators mentioned above, Saudi Arabia is keen to improve its performance as a flag state.

5.2 Recommendations

According to Griffin (1994), MARPOL relies on the flag States as the main enforcement agents something which has affected the success of its implementation

considering that flag States are given exclusive rights and duties of certifying and inspecting their ships. Enforcing IMO conventions like MARPOL basically entails taking all actions considered necessary for the national and international standards of marine operations to be observed. It is advisable to develop and implement programs of monitoring and controlling the manner in which a flag State fulfils its mandate. The monitoring role can be played by internal management systems.

Through effective and rigorous enforcement and integration of international instruments of IMO into national legislation, it is possible to enforce compliance. Saudi Arabia is advised to provide continuous training programs for the staff of maritime administration as well as national and regional drills on ways of preventing pollution and promoting marine safety. Moreover, introducing incentives like rewards for seafarers and shipping companies at large to encourage responsibility.

It is advisable to initiate actions aimed at identifying and eliminating causes of non-conformities and potential non-conformities. "Under the enforcement framework, every State has a duty to make sure that ships which fly its flag or which are under its control comply with MARPOL 73/78" (Griffin, 1994, p. 496). This can be achieved through analysis and review of non-conformities. Performance of a flag State may be reflected in FSI results, casualty statistics, and PSC detention rates. Performance evaluation by the flag State should be conducted on a periodic basis, that is; at regular intervals. After issues of non-compliance, the existing corrective actions may be reviewed (IMO, 2013).

There are priority aspects in the review and evaluation of flag State activities. Regular review should be done to determine accident ratios or fleet loss, cases of ship detainment, cases of violation among crew members, responsiveness to deficiency reports, quality of investigations following serious accidents and issues withdrawal or suspension of certificates reported (Nordquist, 2011).

Saudi Arabia should have a strategy or a mechanism of evaluating the effectiveness with which it meets IMO conventions especially the mandatory ones (Hosanee, 2008). In the absence of enforcement strategies, roles and responsibilities

may be neglected. If there are no incentives to play certain duties, parties are likely to be non-compliant. III code requires States to set up strategies aimed at fostering successful adherence to international obligations. Although the strategy serves as an assessment tool, in this case, there should be a method of assessing if the strategy itself is facilitating effective enforcement of IMO instruments (Schröder-Hinrichs, 2015). In other words, the strategy should be under constant review for achievement, maintenance and improvement of the organizational performance. A State should not allow ships flying its flag to sail if the ship does not meet at least one of the applicable sailing requirements. The periodic inspection of ships can be done at any destination, that is; at flag State's port or in foreign ports. It is the responsibility of the flag State to facilitate implementation of MARPOL convention onboard its ships.

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Appendix



EXECUTIVE SUMMARY REPORT IMO NEEDS ASSESSMENT MISSION TO KINGDOM OF SAUDI ARABIA 14 TO 18 APRIL 2019

Name of State	KINGDOM OF SAUDI ARABIA
Principal Government entity	Public Transport Authority
Other entities involved	Saudi Ports Authority Islamic Port of Jeddah Communication Center Riyadh General Authority of Meteorology & Environment Protection JMRCC - Saudi Border Guard The General Commission for Survey
Period of audit	14April - 18April 2019
Scope	<ol style="list-style-type: none">1 International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS 1974);2 Protocol of 1988 relating to the International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS PROT 1988);3 International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating thereto, as amended (MARPOL 73/78);4 Protocol of 1997 to amend the International Convention for the Prevention of Pollution

	<p>from Ships, as modified by the Protocol of 1978 relating thereto (MARPOL PROT 1997);</p> <p>5 International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW 1978);</p> <p>6 International Convention on Load Lines, 1966 (LL 1966);</p> <p>7 Protocol of 1988 relating to the International Convention on Load Lines, 1966 (LL PROT 1988);</p> <p>8 International Convention on Tonnage Measurement of Ships, 1969 (TONNAGE 1969); and</p> <p>9 Convention on the International Regulations for Preventing Collisions at Sea, 1972, as amended (COLREG 1972).</p>
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Areas	Flag State	X	Coastal State	X	Port State	X
Narrative	<p>The State was audited in accordance with resolution A.1067(28) on Framework and Procedures for the IMO Member State Audit Scheme and resolution A.1070(28) on IMO Instruments Implementation (III) Code serving as the audit standard.</p> <p>During the audit the following were established:</p> <p>.1 6 findings and 1 observation were revealed under general responsibilities and obligations of the State;</p> <p>.2 10 findings and no observations were revealed under flag State activities;</p> <p>.3 4 findings and no observations were revealed under coastal State activities; and</p> <p>.4 4 findings and no observations were revealed under port State activities.</p> <p>The breakdown of findings and observations is as shown below.</p>					

<p>General</p>	<p>Finding (FD-1) No means in place to ensure compliance with relevant international rules and regulations in respect of maritime safety and protection of the marine environment. The Member State has not implemented and enforced the provisions of the applicable IMO instruments through appropriate national legislation and to provide the necessary implementation and enforcement infrastructure. (III Code, Part 1, Para 4 and 8).</p> <p>Finding (FD-2) The latest amendments to the MARPOL, SOLAS, Load Line and the Tonnage Conventions has not been promulgated into national legislation. (III Code, Part 1, Para 8).</p> <p>Finding (FD-3) The 5 year independent evaluation report in accordance with the STCW Convention has not been forwarded to IMO since 2017. (III Code, Part 1, Para 9).</p> <p>Finding (FD-4) The State has not fulfilled the obligation regarding the communication of mandatory information to IMO as required as required by the relevant IMO mandatory instruments to which it is a party. (III Code, Part 1, Para 9).</p> <p>Finding (FD-5) The State (Maritime Administration) has no documented procedures for handling of records established. (III Code, Part 1, Para 10).</p> <p>Finding (FD-6) Non-conformities and corrective actions are not recorded. No continual monitoring in the State. There exists no culture providing opportunities to people for improvement of performance in maritime safety and environmental protection activities. No Continual improvement presented and no "Quality System" developed and implemented in Public</p>
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	<p>Transport Authority to ensure as an example the PDCA (Plan Do Check Act) principles to improve the system. (III Code, Part 1, Para 11 and 12).</p> <p>Observation (OB-1) The State has not developed and implemented an overall strategy to ensure that international obligations and responsibilities as a flag, port and coastal State are met. (III Code, Part 1, paragraph 3.).</p>
Flag State activities	<p>Finding (FD-7) The State has not implemented all the required policies (procedures) through national legislation and guidance to assist in the implementation and enforcement of the requirements of the IMO Conventions. (III Code, Part 2, Para 15.1).</p> <p>Finding (FD-8) The division of responsibilities within the Maritime Administration is not clearly defined.(III Code, Part 2, Para 15.2).</p> <p>Finding (FD-9) The State has not established processes capable of administering a safety and environmental protection programme.No audit and inspection programme developed and implemented. (III Code, Part 2, Para 16.1 and 16.2).</p> <p>Finding (FD-10) The measure that are implemented in casualty investigation did not comply with the Casualty Investigation Code. (III Code, Part 2, Para 16.3.3,16.4, 38 and 41).</p> <p>Finding (FD-11) The state did not comply with the RO Code (MSC Circ. 349(92)). (III Code, Part 2, Para 18.1, 20, 20.1 and 20.2),</p> <p>Finding (FD-12)</p>

	<p>The State did not define the expression “to the satisfaction of the Administration”. (III Code, Part 2, Para 16.5).</p> <p>Finding (FD-13) The State has not developed and implemented a control and monitoring programme. (III Code, Part 2, Para 23).</p> <p>Finding (FD-14) The State has not ensured the training and oversight of activities of flag State surveyors and investigators. (III Code, Part 2, Para 24.5).</p> <p>Finding (FD-15) The flag State has not developed and implemented a documented system for the qualification of personnel and continuous updating of their knowledge as appropriate to the tasks they are authorized to undertake. (III Code, Part 2, Para 35).</p> <p>Finding (FD-16a) The State (flag, port and coastal State) has not on a periodic basis evaluated its performance with respect to the implementation of administrative processes, procedures and resources necessary to meet their obligations as required by the conventions to which they are party. (III Code – Part 2, Para 42, Part 3 para. 51 and Part 4 para 63).</p>
<p>Coastal activities</p> <p>State</p>	<p>Finding (FD-16b) The State (flag, port and coastal State) has not on a periodic basis evaluated its performance with respect to the implementation of administrative processes, procedures and resources necessary to meet their obligations as required by the conventions to which they are party. (III Code – Part 2, Para 42, Part 3 para. 51 and Part 4 para 63).</p> <p>Finding (FD-20) It was observed that there was no broadcasting of weather forecasts twice a day as required by SOLAS. (III Code Part 3, para 48.2 and SOLAS Chapter V Regulation 5).</p>

	<p>Finding (FD-21) It was observed that there was not sufficient broadcasting of NtM and Navigational warnings to the ships in the area within the responsibility of Saudi Arabia. (III Code Part 3, para 48.2 and SOLAS Chapter V Regulation 4).</p> <p>Finding (FD-22) It was observed that there was no participation from the SAR services in the development of plans for cooperation in the event of an emergency with passenger ships calling ports of Saudi Arabia. (III Code Part 3, para 48.3 and SOLAS Chapter V Regulation 7.3).</p>
<p>Port State activities</p>	<p>Finding (FD-16c) The State (flag, port and coastal State) has not on a periodic basis evaluated its performance with respect to the implementation of administrative processes, procedures and resources necessary to meet their obligations as required by the conventions to which they are party. (III Code – Part 2, Para 42, Part 3 para. 51 and Part 4 para 63).</p> <p>Finding (FD-17) The port State has not developed and implemented procedures to ensure that port State control is carried out in conformity with IMO Resolution A.1119(30). (III Code – Part 4, Para 56.2 and 61 - 62).</p> <p>Finding (FD-18) The State did not establish reception facilities in its ports as required by MARPOL Annexes I, II, IV, V and VI. In addition there was no evidence for a mechanism for assessment of the adequacy of port reception facilities.). (III Code – Part 4, Para 56.1).</p> <p>Finding (FD-19) It was observed that the carriage of dangerous goods in solid form bulk by sea is not in conformity</p>

	of the provision of chapter VII of SOLAS. (SOLAS Chapter VII Regulation 7.2.2).
<i>Notation: The findings and/or observations identified above were obtained from sampling and not all obligations and requirements contained in the instruments were tested during the audit.</i>	
