The Bahamas Maritime Authority

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Passenger Ship Bottom Inspections

Notice to ship owners, managers, Masters, Inspectors, Recognised Organisations and surveyors

1. Purpose

1.1. This Notice sets out the requirements of the Bahamas Maritime Authority (BMA) for bottom inspections of passenger ships.

2. Application

2.1. This Notice applies to all Bahamian ships holding a Passenger Ship Safety Certificate, except ro-ro passenger ships and high-speed passenger craft.

3. Introduction

3.1. Regulation 7(b)(ii) of Chapter I of the International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS), requires an inspection of the outside of a passenger ship's bottom at every Passenger Ship Safety Certificate renewal survey.

3.2. International Maritime Organization (IMO) Assembly Resolution *A.1207(34) Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2025*, specifies that inspection of a passenger ship's bottom, as required by SOLAS Regulation I/7, should be carried out annually, with at least two inspections in dry-dock in any five-year period[1].

3.3. Where acceptable to the Administration, the minimum number of inspections in dry-dock of the outside of the bottom of a passenger ship, other than a ro-ro passenger ship, in any five-year period may be reduced from two to one. In such cases, the interval between consecutive inspections in dry-dock shall not exceed 60 months.

3.4. The BMA recognises that technology and methods are available to satisfactorily examine a ship's hull and, in some cases, to perform measurements of rudder and tailshaft weardown while the ship is in water. Modern high-performance hull coatings are also designed to extend the coating maintenance period.

[1] The definition of "any five-year period" is the five-year period of validity of the International Load Line Certificate – see paragraph 5.10 of Resolution A.1207(34).

3.5. The BMA has permitted passenger ships of up to 15 years of age to undertake one inspection of the outside of the ship's bottom in dry-dock in any five-year period since 2005.

3.6. The BMA has subsequently undertaken pilot projects on several passenger ships to assess the feasibility of extending the principle of one inspection of the outside of the ship's bottom in dry-dock in any five-year period to ships over 15 years of age. The pilot projects were successful, and no adverse conditions were identified as a result of applying this arrangement.

4. Bottom survey requirements – all passenger ships

4.1. All passenger ships to which this Notice applies shall undergo an inspection of the outside of the ship's bottom in dry-dock at least twice in any five-year period, except where the BMA accepts an in-water survey in lieu of one of those inspections in accordance with this Notice.

4.2. The remaining renewal inspections of the outside of the ship's bottom required by SOLAS Regulation I/7(b)(ii) may be carried out in-water, provided that:

i. an appropriate Classification Society notation for in-water survey (IWS) is assigned to the ship;
ii. the ship is arranged for in-water survey of the hull and, where considered necessary by the Recognised Organisation (i.e. the ship's Classification Society), for examination or measurement of the tailshaft, rudder, propeller, stabilising apparatus and other underwater appendages; and
iii. the BMA has accepted the application for IWS[2].

4.3. Acceptance of an application for IWS is subject to the following conditions:

i. there are no overdue Conditions of Class, Recommendations, or similar items relating to defects in any part of the ship's structure, machinery or underwater fittings that may affect the suitability of the ship for IWS;
ii. the IWS is carried out by a diving company approved by the Recognised Organisation and in accordance with an approved survey plan;
iii. the IWS is carried out at a geographical location agreed with the Recognised Organisation, with the ship at a suitable draught, in sheltered waters with weak tidal streams and currents and in weather conditions conducive to a safe and effective survey;

[2] BMA acceptance is only required where the IWS is proposed in lieu of one of the two bottom inspections in dry-dock required in any five-year period.

iv. the underwater body is surveyed in sufficiently clear and calm water. Visibility and water conditions shall be suitable to provide sufficient evidence for the attending surveyor to determine that the hull inspection requirements have been met and the hull is in satisfactory condition. In general, a significant portion of the propeller or rudder should be clearly visible in a single view;

v. the attending surveyor is satisfied with the hull marking and mapping arrangements and the method of pictorial presentation. To facilitate an effective survey, the underwater hull and fittings should be permanently and clearly marked externally, including the boundaries of tanks;

vi. sufficient information, including relevant plans necessary to facilitate the survey, is available on board to the satisfaction of the attending surveyor;

vii. underwater parts that cannot be adequately examined by adjusting the ship's trim or heel are surveyed, and any necessary maintenance is carried out, with the assistance of a diver to the satisfaction of the attending surveyor. The survey shall include CCTV monitoring and electronic video recording of the ship's hull, appendages, sea chests and other relevant elements, together with still photographs where required. Effective two-way communication shall be maintained between the diver and personnel at the surface, including the attending surveyor;

viii. the hull below the waterline is sufficiently clean to enable the attending surveyor and diver to determine the physical condition of the hull and its coating;

ix. internal areas of the hull plating are made available for inspection to the same extent as would be required if the ship were in dry-dock.

4.4. Where the conditions specified in paragraphs 4.2 and 4.3 are not fully satisfied, the Recognised Organisation shall submit its recommendation and supporting technical justification to the BMA for consideration.

5. Ships up to 15 years of age

5.1. For passenger ships up to 15 years of age at the time the relevant dry-docking is due, the BMA may permit an IWS in lieu of one of the two bottom inspections in dry-dock in any five-year period under paragraph 4.1.

5.2. An application for one bottom inspection in dry-dock in any five-year period shall satisfy the following conditions:

5.2.1. The interval between consecutive bottom inspections in dry-dock shall not exceed 60 months (5 years).

5.2.2. The ship shall comply with paragraph 4.3 and the application to the BMA shall comply with section 8.

5.2.3. The Company[3] shall implement a comprehensive maintenance regime based on a five-year cycle for relevant underwater components, fittings and equipment. The maintenance regime should include, as applicable:

i. **Shafting and stern tube**: Stern tube bearings should be oil-lubricated or, in the case of water-lubricated systems, the shafting should be manufactured from corrosion-resistant material. Where weardown measurements cannot be taken, consideration may be given to determining stern bush clearances from the operating history, onboard testing and stern bearing oil analysis;

ii. **Shell coating**: The hull coating system should provide effective corrosion protection and anti-fouling performance throughout the anticipated five-year period in water. High resistance or advanced coating systems, including silicone-based coatings, may be accepted where suitable for the intended service;

iii. **Shaft seals**: Shaft seals should be suitable for five years of service. Advanced arrangements, including air seals with failure mode redundancy, may provide additional assurance of continued serviceability;

iv. **Bow thrusters and stern thrusters**: Where fitted, inspection and maintenance should follow a five-year cycle, taking account of lubricant analysis, service history, condition monitoring information and the manufacturer's recommendations. A defect does not, by itself, constitute statutory or class non-compliance unless operation of the equipment is required by the ship's approved design, class notation or an applicable statutory requirement. Defects shall nevertheless be recorded and addressed through the ship's planned maintenance system;

v. **Rope cutters**: Where fitted, rope cutters should be inspected and maintained in accordance with the manufacturer's recommendations and the ship's planned maintenance system. Inoperability of a rope cutter does not, by itself, constitute statutory or class non-compliance unless it is required by the ship's approved design, class notation or an applicable statutory requirement;

vi. **Main propellers and shafting for controllable pitch propellers (CPPs)**: Replacement intervals for main propeller blade foot seals and shaft seals should be consistent with the five-year maintenance regime, taking account of lubricating oil analysis and service history. Dismantling of the main propeller hub(s) for general overhaul may be undertaken at intervals exceeding five years where supported by the manufacturer's recommendations and accepted by the Recognised Organisation. Screwshaft surveys should normally be carried out at intervals not exceeding five years unless an approved screwshaft condition monitoring scheme is in effect;

vii. **Rudders**: Rudders and rudder bearings, including pintles and stocks, should be inspected and bearing clearances taken at an IWS carried out in lieu of dry-dock.

[3] The 'Company' is the entity responsible for the operation and management of the ship in accordance with the ISM Code (SOLAS Chapter IX), as applied under the Merchant Shipping Act, 2021. Where the ISM Code is not applicable, the Company is the entity recorded as responsible for the operation of the ship in accordance with regulation 5(3)(d) of the Merchant Shipping (Registration) Regulations, 2026.

Rudders should also be inspected and bearing clearances taken at least once every five-year period while the ship is in dry-dock. Where the clearances of oil-lubricated bearings cannot be measured during an IWS, consideration may be given to determining their condition from the operating history and onboard testing. Replacement of sliding blocks and flap bushes of Becker rudders may be undertaken at intervals exceeding five years where supported by the manufacturer's recommendations and accepted by the Recognised Organisation;

viii. **Sea chests**: Means such as hinged gratings should be provided to allow divers access to each sea chest and permit examination of the external sides of through-hull connections and sea valves;

ix. **Anodes, cathodic protection and sea valves**: The maintenance regime should provide for inspection and replacement of cathodic protection anodes, taking account of the rate of depletion experienced in service. Any sea valves found to require replacement during an IWS shall be replaced without delay;

x. **Hull thickness measurements**: The use of IWS shall not prevent any hull thickness measurements required by the Recognised Organisation;

xi. **Podded propulsion units (PODs)**: Inspection and replacement of drive-end and non-drive-end bearings and seals should be incorporated into the five-year maintenance regime, taking account of the manufacturer's recommendations, service history and condition monitoring data.

5.3. The items listed in paragraph 5.2.3 are not exhaustive. Other underwater components, fittings and equipment shall be included in the maintenance regime where relevant to the ship's design and arrangements.

5.4. In all cases, component design life, the manufacturer's recommended maintenance, the Company's planned maintenance system and the Recognised Organisation's survey requirements shall be compatible with one bottom inspection in dry-dock in any five-year period.

6. Additional requirements for ships over 15 years of age

6.1. For passenger ships over 15 years of age at the time the relevant dry-docking is due, the BMA may accept an IWS in lieu of one of the two bottom inspections in dry-dock required in any five-year period under paragraph 4.1, subject to compliance with sections 4 and 5 and the additional requirements of this section.

6.2. The Company shall maintain documented planning arrangements for heavy maintenance normally undertaken in dry-dock. The Recognised Organisation shall review outstanding maintenance items at the time of the IWS and confirm that appropriate planning arrangements are in place.

6.3. The Company shall advise the BMA and the Recognised Organisation without delay of any damage or failure affecting the hull, propellers, rudders, PODs (including seals, bearings and steering mechanisms), transverse thrusters, fin stabilisers or underwater fittings.

6.4. For ships over 20 years of age, the Recognised Organisation shall complete a ship-specific study before submitting the application required by section 8. The study shall include a documented review of:

i. structural condition and thickness-measurement records;
ii. coating condition in ballast tanks, void spaces and other relevant spaces;
iii. survey, classification and repair history;
iv. planned and outstanding maintenance normally undertaken in dry-dock;
v. condition-monitoring records for propulsion, steering and underwater equipment;
vi. operating profile and casualty or damage history;
vii. relevant Port State Control history; and
viii. any other factor considered relevant by the Recognised Organisation.

The Recognised Organisation shall confirm that the study has been completed, identify any conditions or additional survey measures considered necessary, and state whether it supports the proposed IWS.

6.5. Before the application required by section 8 is submitted, the Recognised Organisation shall review the records and information required by paragraph 6.4. This documentary review may be undertaken remotely. The focused internal structural inspection required by paragraph 6.8 shall be carried out by, or under the direct supervision of, the attending surveyor and shall not be replaced solely by information supplied by the Company.

6.6. The following shall make the ship unsuitable for IWS in lieu of dry-docking unless repaired or otherwise resolved to the satisfaction of the Recognised Organisation before the IWS:

i. substantial corrosion or structural deterioration requiring repair;
ii. coating condition in relevant ballast tanks or void spaces rated less than GOOD, unless the extent and cause have been assessed and an alternative accepted by the Recognised Organisation;
iii. unexplained or progressive wastage, pitting, deformation, cracking or leakage;
iv. damage affecting the external hull, appendages or underwater fittings; or
v. any condition preventing the attending surveyor from confirming the satisfactory condition of the ship's bottom.

6.7. Where such a condition cannot be satisfactorily resolved afloat, the ship shall be dry-docked. Additional examination may be required to establish the extent of deterioration but shall not be treated as an alternative to necessary repair.

6.8. Ships over 15 years of age shall be subject to the focused internal structural inspection specified in paragraph 6.10.

6.9. Where significant structural deterioration, coating breakdown, or unexplained corrosion is identified, the BMA or Recognised Organisation may require:

i. additional internal examinations; or
ii. a dry-dock inspection, irrespective of age or previous approvals.

6.10. The focused internal structural inspection required by paragraph 6.8 shall include, as a minimum, the following areas, whether the bottom survey is conducted in water or in dry-dock:

6.10.1. Tank tops

i. Visual examination of tank tops in way of ballast tanks, fuel oil tanks and void spaces, with particular attention to:

- coating condition;
- pitting corrosion;
- deformation or buckling; and
- weld seams and brackets.

ii. Where coating breakdown exceeds localised deterioration, thickness measurements shall be carried out to the satisfaction of the Recognised Organisation.

6.10.2. Shell plating stub pipes

i. All shell plate stub pipes, including ballast, bilge, sounding and air pipes, shall be examined internally and externally where accessible, with particular attention to:

- weld toes at shell penetration;
- evidence of crevice corrosion; and
- local wastage beneath pipe collars and doubler plates.

ii. Any suspect wastage shall be verified by thickness measurements.

6.10.3. Ballast piping

i. Ballast pipes within tanks and void spaces shall be examined along their full accessible length, with particular attention to:

- horizontal runs near tank tops;
- elbows and low points; and
- areas beneath manhole covers and sounding pipes.

ii. Where original ballast piping is retained beyond 15 years, a planned replacement programme or condition monitoring strategy acceptable to the Recognised Organisation should be considered.

6.10.4. Exhaust gas cleaning system washwater discharge outlets

i. Where fitted, exhaust gas cleaning system washwater discharge outlets, including the adjacent shell plating, welds, internal piping and protective coatings, shall be examined, with particular attention to coating breakdown, staining, grooving, pitting and local wastage. Suspect areas shall be subjected to thickness measurement to the satisfaction of the Recognised Organisation.

6.10.5. Structural tanks used for sewage and grey water

i. Where double-bottom or other structural tanks are used for black water, sewage, treated sewage or grey water, accessible internal structure, coatings, manholes, pipe penetrations, suction arrangements, stiffeners and bulkheads shall be examined, with particular attention to coating breakdown, pitting, microbial or chemical corrosion and local wastage. Suspect areas shall be subjected to thickness measurement to the satisfaction of the Recognised Organisation.

7. Survey window

7.1. The bottom inspection, either performed in water or in dry-dock, shall be carried out within the normal allowable window for the Passenger Ship Safety Certificate renewal survey, i.e. within the three months before the due date of the survey.

7.2. For the purposes of determining the required number and timing of bottom inspections in dry-dock, the “five-year period” is the period of validity of the International Load Line Certificate, as specified in Resolution A.1207(34).

8. Applying for IWS

8.1. The Company shall request that the Recognised Organisation makes an application to the BMA for acceptance of the proposed IWS **at least four weeks in advance of the intended date of the survey**.

8.2. The Company's proposed schedule and the conditions for performing the IWS must be acceptable to the Recognised Organisation to allow effective planning and execution.

8.3. The application shall be made to the BMA by the Recognised Organisation in accordance with BMA Marine Notice 08. The application must include the following:

i. the proposed date and location for the IWS;
ii. a written statement from the Master of the ship confirming that the ship, to his or her best knowledge, has not sustained any grounding or contact damage since the previous bottom inspection and that nothing unusual has been observed that would indicate that any part of the ship's bottom or protuberances has been otherwise damaged;
iii. confirmation from the Recognised Organisation that there are no overdue Conditions of Class, Recommendations, or similar items relating to defects in any part of the ship's structure, machinery or underwater fittings that may affect its suitability for IWS. Where outstanding items exist, the Recognised Organisation shall provide the proposed timescale for rectification and its recommendations for monitoring the items pending rectification;
iv. a clear statement from the Recognised Organisation supporting the application or identifying any reservations concerning it;
v. details of any deterioration, coating breakdown, unexplained corrosion, repairs or additional examinations identified during the pre-application suitability review; and
vi. confirmation of any conditions imposed by the Recognised Organisation for acceptance of the IWS;
vii. for ships over 15 years of age, confirmation of the proposed scope and arrangements for the focused internal structural inspection required by paragraph 6.8 and specified in paragraph 6.10; and
viii. for ships over 20 years of age, confirmation that the ship-specific study required by paragraph 6.4 has been completed and that the Recognised Organisation is satisfied that the ship is suitable for one bottom inspection in dry-dock in any five-year period.

8.4. The BMA will review the application, taking into account all relevant factors, and advise the Recognised Organisation whether the proposed IWS is accepted.

9. Monitoring and reporting by Recognised Organisations

9.1. The Recognised Organisation shall advise the BMA of the outcome of any in-water survey where further examination or remedial action requiring dry-docking may be necessary.

9.2. The Recognised Organisation shall make the complete survey report available to the BMA through its online platform or by email. For ships over 15 years of age, the report shall be sent to the BMA by email following completion of the IWS.

9.3. The report shall include:

i. the scope and results of the external underwater survey;
ii. the scope and results of the focused internal structural inspection required by paragraph 6.8 and specified in paragraph 6.10;
iii. assessment of hull coating and structural condition;
iv. results and acceptance of measurements taken;
v. condition of appendages, sea chests and other underwater fittings;
vi. defects, repairs and outstanding recommendations; and
vii. the Recognised Organisation's conclusion regarding the ship's continued suitability for one dry-docking in any five-year period.

9.4. The Recognised Organisation shall advise the BMA without delay of any new Conditions of Class, Recommendations or memoranda related to hull, propellers, rudders, PODs, transverse thrusters, fin stabilisers or underwater fittings.

10. Definition of "first dry-docking"

10.1. Where a new regulation is required to be applied at the "first dry-docking", the BMA requires it to be applied on the basis that a passenger ship is dry-docked twice in any five-year period, regardless of the age of the passenger ship.

10.2. This policy does not apply where a date is otherwise stipulated in the regulation or in any additional IMO guidance.

11. Queries

11.1. Any queries on this Notice may be addressed to tech@bahamasmaritime.com or any BMA office.

Revision History

Version	Description of Revision
1.0	First Issue
1.1	New paragraph 7 on passenger ships over 20 years of age and renumbering of subsequent paragraphs. Updated links
2.0	Updated hyperlinks. Consolidated and simplified requirements for ships over 15 years of age, including revised focused inspection requirements and streamlined criteria for ships over 20 years of age.