



# The ISM Code

## 5. Revised Guidelines for Administrations

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## **Resolution A.1071(28)**

### **Revised guidelines on implementation of the ISM code by administrations**

Revokes resolution A.1022(26) with effect from 1 July 2014

## Scope and application

- The Administration is responsible for verifying compliance with the requirements of the ISM Code
- Carrying out the interim, initial, annual and renewal verification of the **DoC** and the interim, initial, intermediate and renewal verification(s) of the SMC, and the Issuing/endorsement of corresponding Certificate and documents
- Provide the scope and additional verifications

(Ensure that Company and shipboard SMS also comply with additional EU regulations and national requirements, if any)

## Duty of Recognized Organizations (RO)

- Where a RO provides both consulting and auditing for ISM Code services, it shall ensure independency
- The RO may provide ISM Code verification services to vessels for which the RO also provides ship statutory certification services, provided, the ship safety management audits are conducted separately
- ISM Code verification and certification process, neither duplicates nor substitutes for surveys for other statutory certificates.

## Authorization of Recognized Organizations (RO)

- Minimum standards (Appendix 1 of Res.A739(18))
- Formal written working relationship Art.5 of Dir 2009/15/EC
- Flag Instructions
- Provision of national law and interpretations of regulations
- Authorization on certifications and issue of certificates
- Monitoring and communication software !!
- The Administration is ultimate responsible for verifying compliance with the requirements of the ISM Code and for issuing Documents of Compliance to companies and SMC to ships.

## Example of National requirements

### Technical Requirements

Passenger vessels including passenger high speed craft and their companies, including companies operating both passenger vessels and cargo vessels, are audited solely by the Administration. The organisation performing the ISM audits need not be the same as the organisation performing the statutory surveys.

In relation to vessels other than passenger ships, LR is authorised to perform initial, annual intermediate and additional audits of Finnish companies and Finnish vessels on the following conditions:

1. The LR auditors are to at least have the competence stated in Resolution A.1022(26);
2. The audit team shall, in general, contain at least two auditors who are able to perform the audit in the language of the Safety Management System (SMS); and
3. The audit is to include an operational emergency drill. The scope of the drill must be extensive enough to verify that the ship personnel are able to handle emergency situations in accordance with approved emergency procedures.

LR is only authorised to issue certificates valid for 5 months after completion of the initial or renewal DOC or SMC audits. The Administration will issue the full term certificate.

All communications from LR offices to the Administration must be made via LR Helsinki



## Ireland's ISM functions delegated to ROs

Recognised Organisation	ISM code	DOC / Issue of Certificate		SMC / Issue of Certificate	
American Bureau of Shipping (ABS)	Y	Y	Y	Y	Y
Bureau Veritas (BV)	Y	Y	Y	Y	Y
DNV-GL	Y	Y	Y	Y	Y
Lloyd's Register (LR)	Y	Y	Y	Y	Y
Nippon Kaiji Kyokai (NKK)	Y	Y	Y	Y	Y
Registro Italiano Navale (RINA)	Y	Y	Y	Y	Y
Russian Maritime Register of Shipping (RMRS)	Y	Y	Y	Y	Y

Marine Notice (No. 41 of 2007EU on Regulation 336/2006)

How does your administration monitor ROs  
and keep track of NCs



## The certification process

The certification process relevant to a DoC for a Company and to a SMC for a ship will normally involve the following type of audits:

- Internal audits (ISM code 12.1)
- Second Part Audits (ISM code 12.2)
- External Audits (ISM code Part B)



## External audits (4.8)



Company

Interim verification (4.2)

Initial verification (4.3)

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Annual verification (4.4)

Renewal verification (4.6)

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Additional verification (4.7)



**DoC**



Ship's

Interim verification (4.2)

Initial verification (4.3)

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Intermediate verification (4.5)

Renewal verification (4.6)

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Additional verification (4.7)



**SMC**

## **Interim verification (4.2)**

Interim verification is intended to ensure that the necessary provisions are in place within the SMS and experience and records are to be built-up by verifying:

- The DOC, Short-term or Interim, is effective for that ship.
- The ship is provided with the manual and procedures related to that ship. Master and relevant senior officers are familiar with SMS and the planned arrangement for its implementation.
- Instructions which are identified as essential to be provided prior to sailing have been given.
- Plans for Internal Audit by the Company of the ship within 3 months.
- The relevant information on the SMS in the working language.

## **Initial verification (4.3)**

Company (and Ship's) Initial Verification may start after developing and implementing and effective functioning of the SMS, including objective evidence that the Company's SMS has been in operation for at least three(3) months at least one ship of each type operated

## Periodical verification (4.4, 4.5)

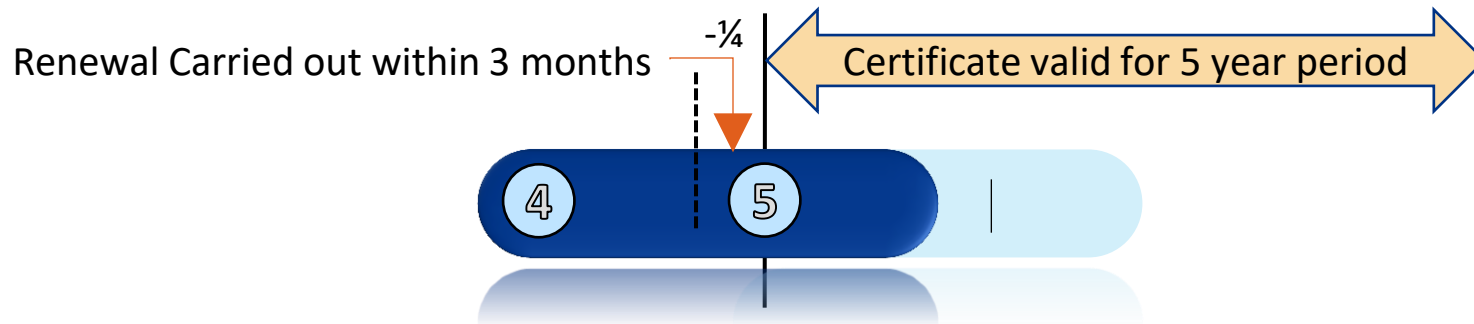
The purpose of the Annual (DoC) and Intermediate (SMC) audits are to maintain the validity by verifying:

- The effective functioning of the SMS;
- That any modifications made to the SMS comply with the requirements of the ISM Code;
- That a corrective action has been implemented;
- That statutory and classification certificates are valid and that no surveys are overdue.

Why not always annual shipboard audits?

## Renewal verification (4.6)

Renewal audits should be performed before the DoC and the SMC expiry dates. Renewal audits may be carried out within three (3) months before the expiry date of the DOC or the SMC



Extension with max 3 months may only in cases where it appears proper and reasonable to do so. (Part B 13.14)

## **Additional verification (4.7)**

The Administration may, where there are clear grounds, require an additional verification to check if the safety management system still functions effectively. Additional verifications may be carried out following situations beyond normal procedures.

- When substantial modifications have been made to the SMS.
- In view of the nature of the NC.
- When a ship's Flag is changed.
- When a ship's particulars such as ship's name are changed.
- When the Company requests reinstatement of an invalidated SMC.

**Can we make an additional audit during an Interim period?**

## **Additional verification (4.7)**

Examples of such situations include port state control detentions, reactivation after the interruption of the operations due to a period out of service or to verify that effective corrective actions have been taken and/or properly implemented additional verifications may affect the shore-based organization and/or the shipboard management system.

The Administration should determine the scope and depth of the verification, which may vary from case to case

MSC-MEPC.7/Circ.9 Guidelines for the reactivation of the safety management certificate following an operational interruption of the safety management system due to lay-up over a certain period

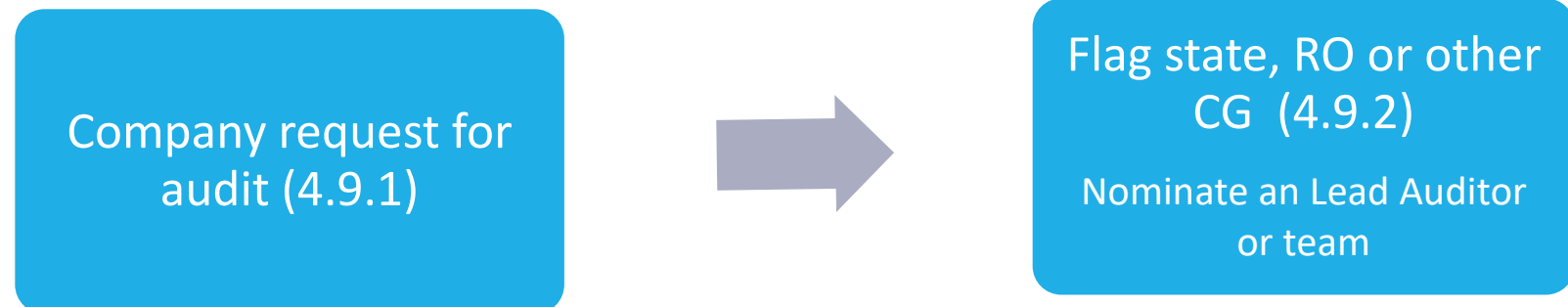
Lay-up  $3 < 6$  months may require an additional audit

Lay-up  $> 6$  months interim audit



## Application for the external audit (4.9)

The Company should submit a request for audit to the Administration or to the RO on behalf of the Administration or at the request of the Administration by another Contracting Government.



## Preliminary review (4.10) (Document review)

- Review of the Safety Management Manual (4.10) (ISM Code 11.3)

As a basis for planning the audit, the auditor should review the safety management manual to determine the adequacy of the SMS in meeting the requirements of the ISM Code.

Does the SMM need to be approve/endorse  
and what about the revisions?

## Preparing the audit (4.11)

- Review of Databases, FS records, PSC inspections, CLASS and accident/incident reports and closed-out NCs.

If this review reveals that the system is not adequate, the audit will have to be delayed until the Company undertakes corrective action.

What about an internal audit carried out  
the day before the external audit?

## Executing the audit (4.12)

Witnessing emergency drills par. 4.12.3

The objective evidence should be collected through interviews and examination of documents. Observation of activities and conditions may also be included when necessary to determine the effectiveness of the safety management system in meeting the specific standards of safety and protection of the

**It is NOT require that drills have to be witnessed!!**

**How do you know the can handle emergencies?**

## 8

## On-board drill requirements

On-board Training, Drills and Inspections of Fire Appliances & Life-Saving Appliances			Service company	Crew	Ship's log	Intervals								
Requirement	SOLAS Regulations	Directive 2009/45/EC				Weekly	Monthly	2-Monthly	3-Monthly	4-Monthly	6-Monthly	Annually	2-Yearly	5-Yearly
Watertight door drills	II-1/21 (II-1/23) MSC.1/Circ.1369	II-1/Part B-2 - 21.1, 22.2		X	X	X2								
Abandon ship drill and fire drill - cargo ships	III/19.3	-		X	X		X							
Abandon ship drill and fire drill - passenger	III/19.3, III/30	III/13.7		X	X	X								
Abandon ship drill - lowering lifeboats	III/19.3.4.1, MSC/Circ. 1206	III/13.4		X	X	X2	X3							
Abandon ship drill - launching lifeboats & rescue boats	III/19.3.4.3 & .6, MSC/Circ. 1206	III/13.2 & 3		X	X		X1		X					
Abandon ship drill - free-fall lifeboat drill	III/19.3.4.4, MSC/Circ. 1206	-		X	X				X					
Abandon ship drill - launch (or simulated launch) free fall lifeboats	III/19.3.4.4, MSC/Circ. 1206	-		X	X						X			
Abandon ship drill - Marine Evacuation System drill	III/19.3.4.8	III/13.5		X	X	X2	X3							
Abandon ship drill - MES training	III/19.3.4.8	III/13.8		X	X								X	
Abandon ship drill - testing of emergency lighting	III/19.3.4.9	III/13.6		X	X	X2	X3							
Enclosed Space Entry and Rescue Drills	III/19.3.3 & 19.3.5, Res.A.1050	III/13.9		X	X			X						
LSA & fire on-board training	III/19.4.1 & .2	II-2/Part A - 15, III/13.8		X	X	X2	X3							
Davit-launched liferaft training	III/19.4.3	III/13.4		X	X					X				
Launching appliances - inspect wire ropes	III/20.4, MSC/Circ. 1206	III/3.6, 3.12	X	X								X		
Launching appliances - wire ropes renewed	III/20.4, MSC/Circ. 1206	III/3.6, 3.12	X	X										X4
Survival craft, rescue boats and launching appliances (visual inspection)	III/20.6.1, MSC/Circ. 1206	III/3.12		X	X	X								
Test run of lifeboat and rescue boat engines	III/20.6.2, MSC/Circ. 1206	III/3.6, 3.14		X	X	X5								
Davit launched lifeboats - Moved from stowed position	III/20.6.3	III/10		X	X	X3								
Testing of public address and general alarm system	III/20.6.4	-		X	X	X								
Davit launched lifeboats - Turned out from stowed position	III/20.7.1	III/13.4		X			X							
Inspection of LSA including lifeboat equipment	III/20.7.2 & III/36.1	-		X			X							
Steering gear tests	V/26.1 & .2	-		X	X	X6								
Emergency steering drill	V/26.4	-		X	X				X					
<b>NOTES:</b>														
1. Dedicated rescue boats launched monthly if possible														
2. Passenger ships														
3. Cargo ships														
4. When necessary due to deterioration of the falls or at intervals of not more than 5.														
5. In special cases the Flag may waive this requirement for ships constructed before 1 July 1986														
6. Within 12 hours before departure or weekly for ships which regularly engage on voyages of short duration														

## Audit reporting (4.13)

- Audit findings should be documented.
- All Major Non-conformities, Non-conformities raised and Observations should be described in detail.
- The Company should receive a copy of the audit report
- Class/statutory related deficiencies found to complete on form IACS PR.17 annual class survey ISM checklist.

## Typical problems with reporting

- Root cause not identified
- Inaccurate description of non-conformity or deficiencies
- Incorrect or ineffective corrective actions agreed / accepted
- Lack of time frame for corrective actions
- Delay of audit report or monitoring data



## Corrective action follow-up (4.14)

- The Company is responsible for determining and initiating the corrective action needed to correct a non-conformity or to correct the cause of the non-conformity. Failure to correct non-conformities with specific requirements of the ISM Code may affect the validity of the DoC and related SMC .
- Corrective actions and possible subsequent audits should be completed within the time period agreed. For corrective actions this should not normally exceed three months. The Company should apply for the follow-up audits as agreed.

## Corrective action follow-up (4.14)

- Failure to take adequate corrective actions, in compliance with the requirements of the ISM Code, including measures to prevent recurrence, may be considered as a major non-conformity.

MSC-MEPC.7/Circ.7 - Guidance on Near-Miss reporting.

How does flag state know when NCs  
(made by the ROs) become overdue/resolved?

How does PSC check the status of NCs?

## Audit duration IACS REC.41

### Minimum Audit Duration

The table determines the durations of ISM Code verification, which take into account that there could be variations depending on each company or ship. One manday is 8 hours. The verification does not include document review. Sufficient time should be allowed for document review as necessary.

		MINIMUM AUDIT DURATION	
<b>COMPANY</b>			
small (up to 20 employees *)		1	
medium (between 21 and 50 employees)		2	
large (more than 50 employees)		2	
* number of relevant employees who carry out or have responsibility to the Safety management System of the company ashore			
	INITIAL VERIFICATION	PERIODICAL VERIFICATION	RENEWAL VERIFICATION
<b>SHIP</b>			
<b>Category I</b>			
passenger ships carrying 1500 passengers and above	2	2	2
<b>Category II</b>			
passenger ships and high speed craft carrying 300 passengers and above	2	1	2

## **A.30/Resolution 1118(30)** **Revised guidelines on implementation of the** **ISM code by administrations**

Revokes resolution A.1071(28) 10 Jan 2018

## Latest Administration guideline amendments

It is no longer considered correct that annual and intermediate verifications are, in some way, less valuable in terms of the learning opportunities and experience they provide for trainee auditors.

- At least five years' experience in areas relevant to the technical or operational aspects of safety management.
- Annual and intermediate verifications of compliance with the requirements of the ISM Code can also be used as training audits.
- A person authorized to carry out ISM audits must have completed at least 4 training audits under the supervision of suitably qualified and experienced auditors. (Before it was 2 annual, renewal or initial verifications).



## Questions?

