



EMSA

Training on ISM Code – IRELAND 2018

**Certification, Non Conformities and actions to
be taken**

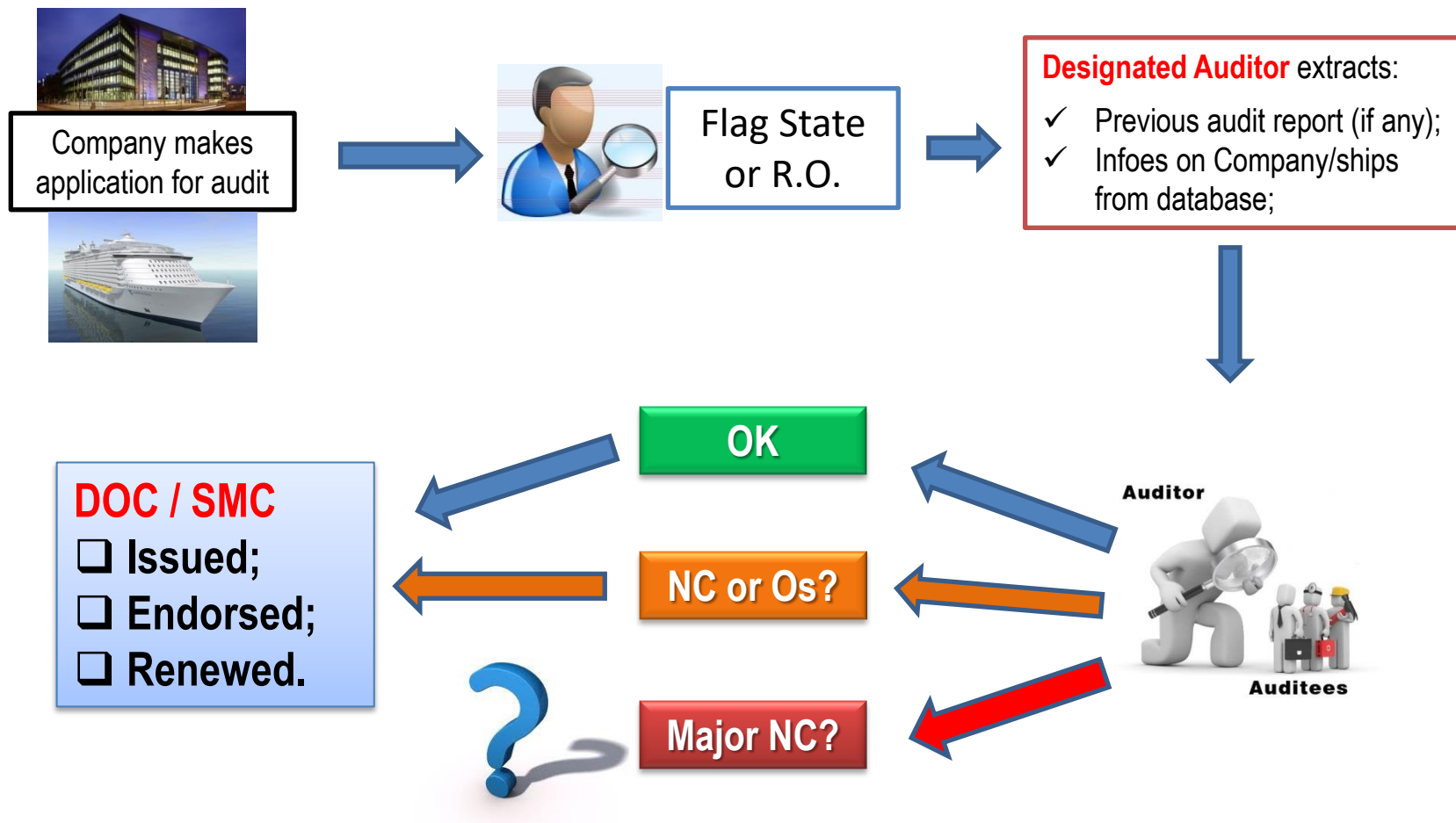
Andrea Cicotto

Italian Coast Guard

Dublin, 02 – 04 October 2018



The ISM Certification process





...from ISM Code...

Objective evidence means quantitative or qualitative information, records or statements of fact pertaining to safety or to the existence and implementation of an safety management system element, which is based on observation, measurement or test and which can be verified.

Observation means a statement of fact made during a safety management audit and substantiated by objective evidence.

Non-conformity means an observed situation where objective evidence indicates the non-fulfilment of a specified requirement.

Major non-conformity means an identifiable deviation that poses a **serious threat** to the **safety** of **personnel** or the **ship** or a serious risk to the **environment** that requires **immediate corrective action** or the **lack of effective** and **systematic** implementation of a requirement of this Code.



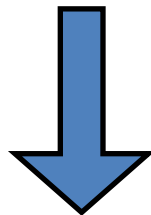
Audit is a **sampling process**

Issuance of certification is based upon verification that the **SAMPLE** is in **compliance** with the ISM Code





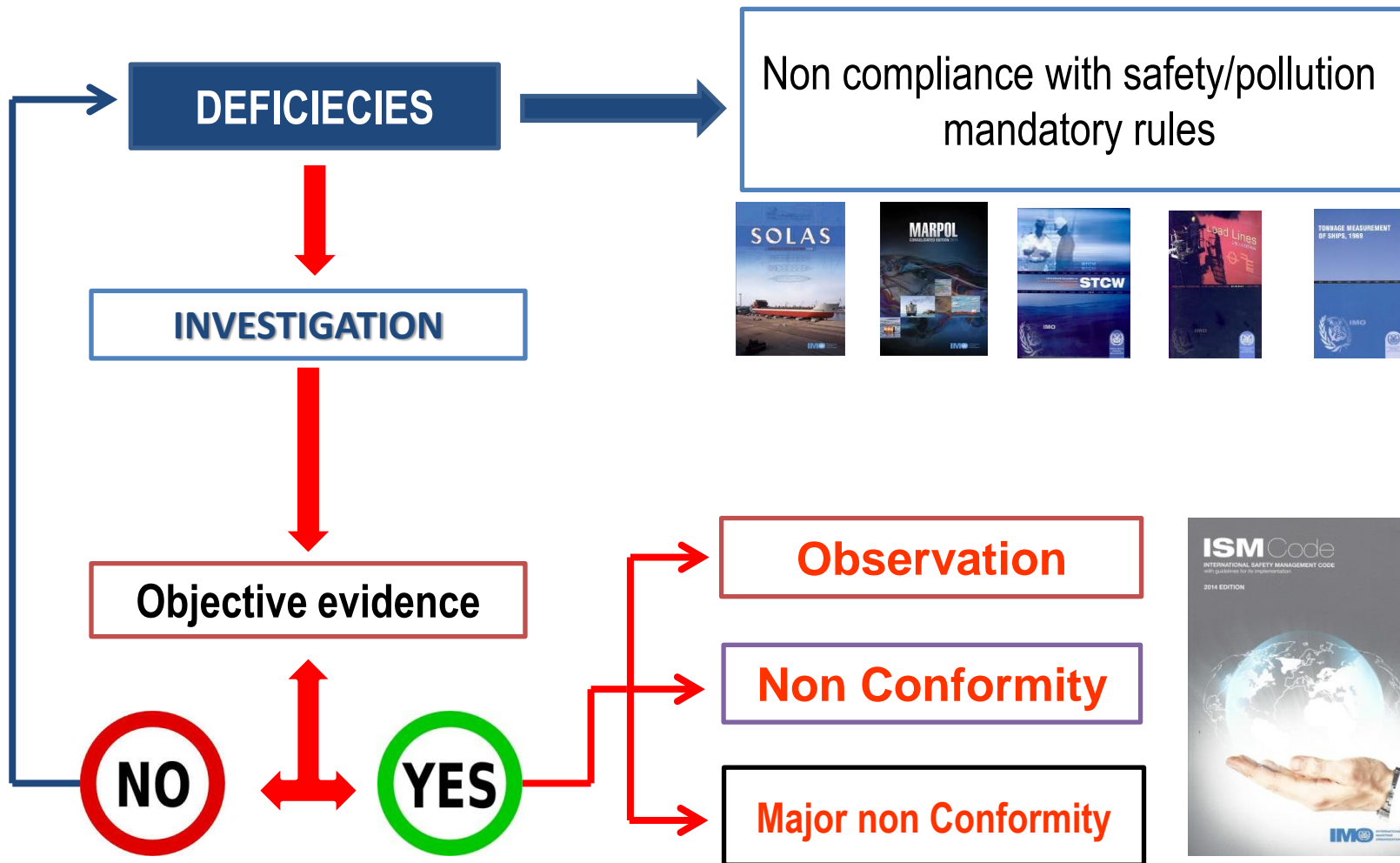
What are we looking for?

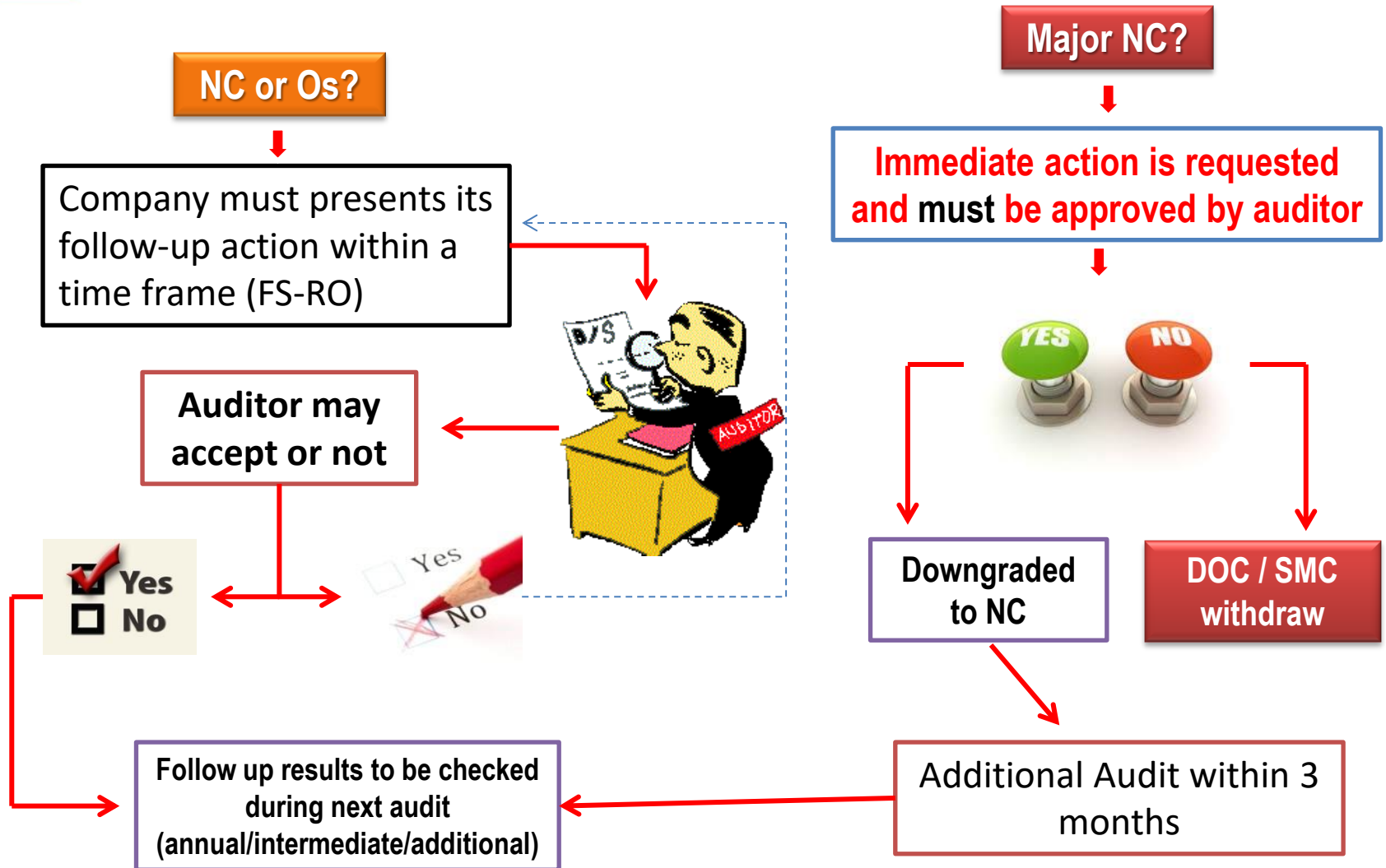


Objective evidencies



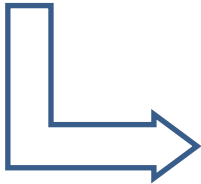
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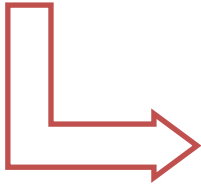




WITHDRAWN of :



DOC



SMC

is a matter of the Flag State, or R.O. if officially authorized to do that *(e.g. after an additional audit with clear instructions...)*



....don't forget...AUDIT is NOT a SAFETY inspection!!!

EXAMPLE

You are walking through the ship looking for evidencies of proper working of the SMS (maintenance, crew performing jobs, cleanliness, etc...)





When you ask to the crew.... They immediately reply:



**«OK Sir, I will
immediately FIX it.
Just give me some
time....»**



10

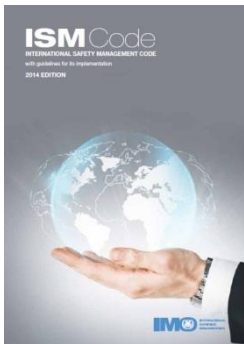
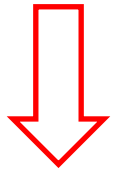


COMPLIANCE





Under SAFETY Inspection purpose..



Investigation on the PMS;



Investigation on their check lists;



Interview with the personnel in charge;

..WHY *they didn't find out it before?*

..HOW *they hand it?*



WHY *they didn't find it out before?*

Lack of knowledge?

Lack of documentation (check list)?

Lack of familiarization?

12

ISM 6.4

ISM 7

ISM 6.3

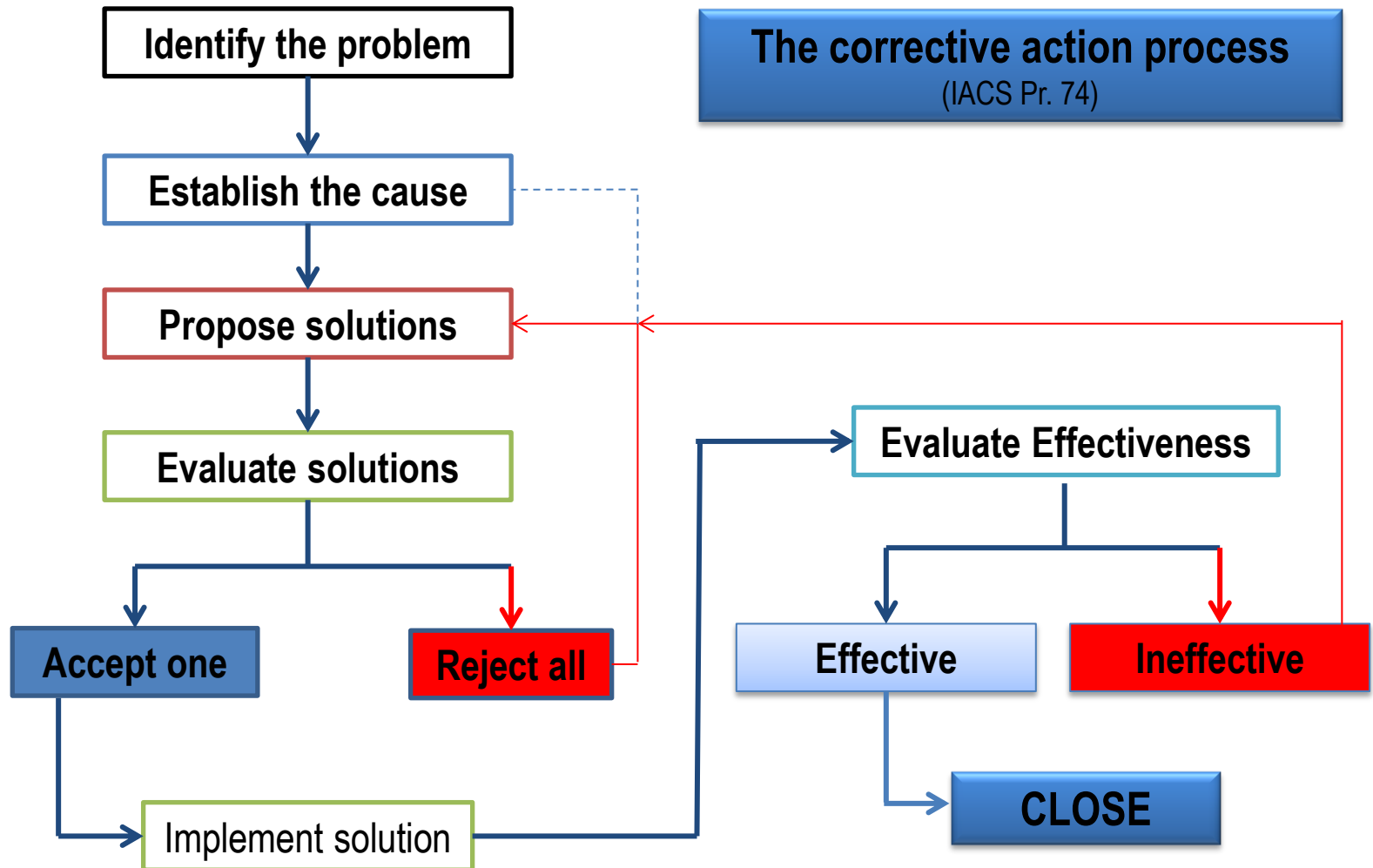


..HOW *they hand it?*

Managing corrective actions, TAKE care of:

➤	✓ root cause analysis	9.1
➤	✓ corrective action	9.1
➤	✓ measures to avoid recurrence.	9.2







Example...

Description The rescue boat fuel tank was found only 1/3 full with fuel.		
Date 11.06.2013	Auditor John Check	Company Representative Frank Grabb
Company's reply: The low level in the rescue boat fuel tank was determined to be caused by a small leakage from the pipeline, which was immediately renewed. Fuel tank was promptly refilled. The Life-saving appliance weekly check list has been amended to include an item to "verify level of rescue boat fuel tank".		

15

root cause analysis

The low level in the rescue boat fuel tank was determined to be caused by a small leakage from the pipeline

corrective action

.which was immediately renewed.
Fuel tank was promptly refilled

measures to avoid recurrence

The Life-saving appliance weekly check list has been amended to include an item to "verify level of rescue boat fuel tank".



Some replies which should not be accepted:

- “**Rectified.**”
- “when convenient...” (*spend money...NEVER*)
- “at the earliest opportunity...” (*due date...???*)
- “We have reminded the Master/Chief ...”(and the **next** Master/CM?)
- “The parts have been delivered on board...” (*then..?*)
- “He has been cautioned and instructed ...” (*who..?? And next one..?*)

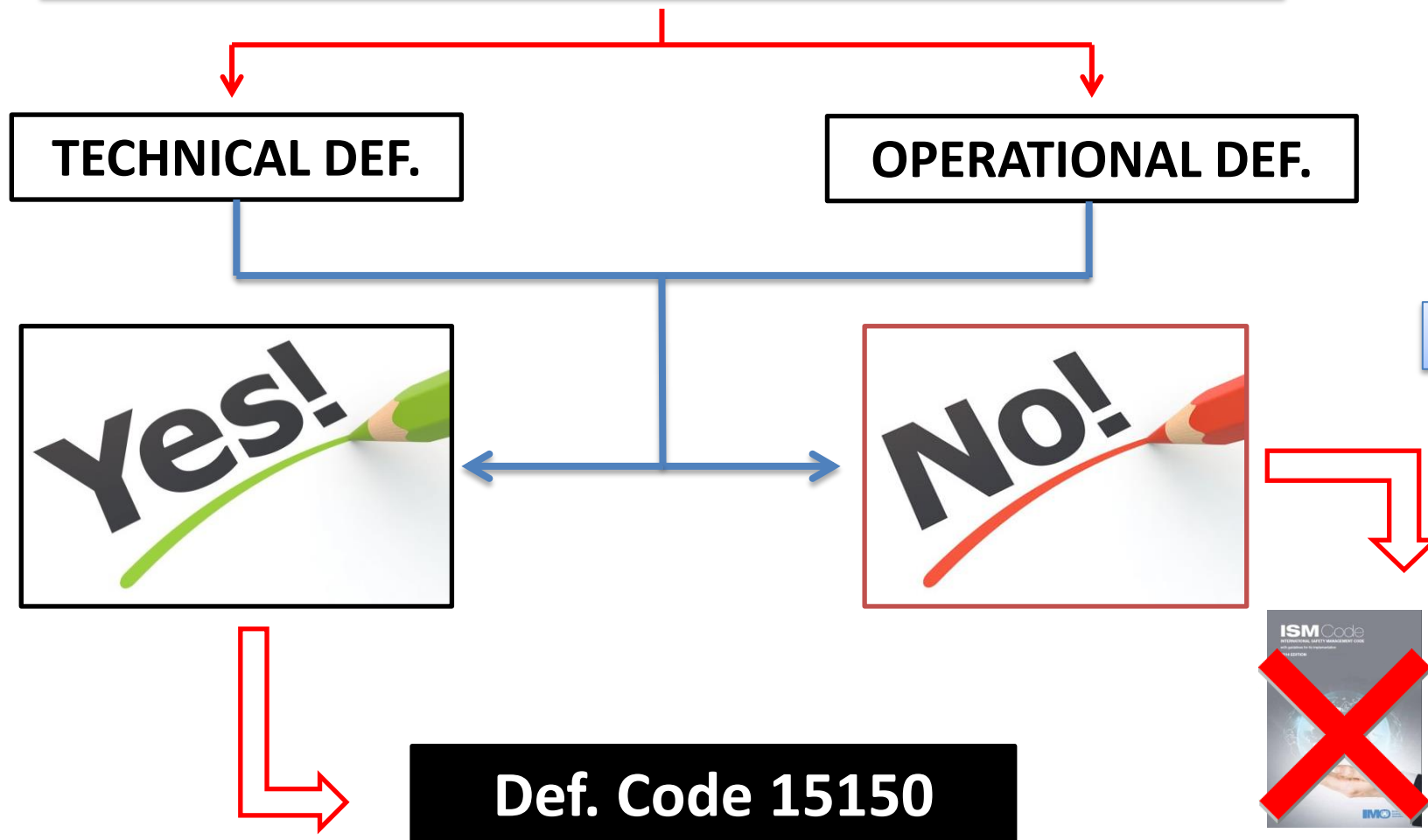




From «Lessons learnt from the ISM-CIC 2002 “ PMOU Publication



What PSCOs think about ISM code?





Def. Code 15150

➤ Deficiency: **detainable** or **NOT**;

ISM Related
<input checked="" type="checkbox"/>

ISM Related
<input type="checkbox"/>

Report an ISM related deficiency (15150) in the PSC inspection report with the requirement of corrective action within 3 months (action taken code **21**)

Ground for detention
<input checked="" type="checkbox"/>



Report an ISM deficiency (code 15150) marked as “ground for detention” in the PSC inspection report with the requirement that a safety management audit has to be carried by the Administration or the RO before the ship may be released from detention (action taken code 19).



Important

NO ISM DEF. CODE 15150 if there is NOT at least one TECHNICAL or OPERATIONAL deficiency

The PSCO will verify the **effectiveness** of any corrective action **by examining the areas** of the **technical** and/or **operational** deficiencies of the (previous) PSC inspection report which led to the issuance of the ISM deficiency.



Walk through the ship looking for maintenance (most of times) and proper working of equipment(s) and with **functional tests** (*familiarization*)



OPERATIONAL controls

...why....



**...bad examples of corrective
actions!!!**





Problem: some quick closing valves not working properly....

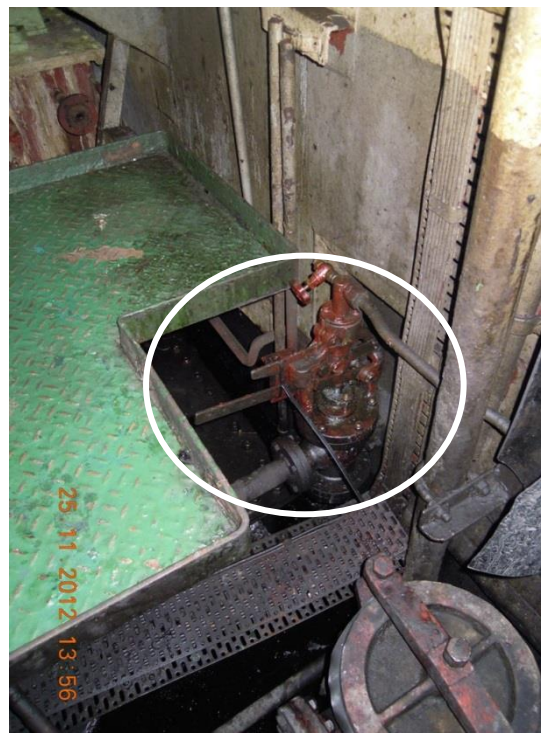


Corrective action....





Problem: some quick closing valves not working properly....





Problem: some quick closing valves not working properly....





I know Mr. Surveyor it is not allowed but, let me say... in case of fire the rope is fiammable so it burns and the valve will be already closed!!!!



Problem: fuel leakage from fuel delivery line (not double jacketed type)



Temporary corrective action: leakage reduced by means of rags...



Problem: fuel leakage from fuel delivery line (not double jacketed type)



Unfortunately the bucket becomes full...



Problem: fuel leakage from fuel delivery line (not double jacketed type)



Corrective action....

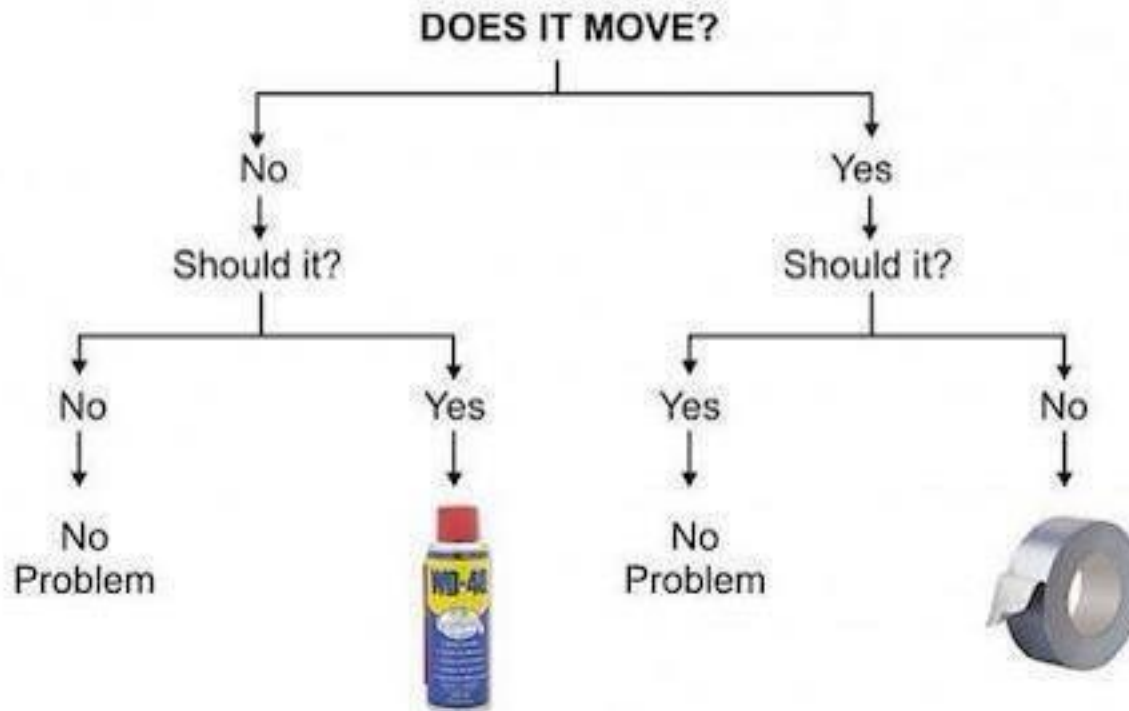
**...but there is
always the bilge
well!!**





Easy NCs management with relevant corrective action - Engine Room -

Engineering Flowchart





Thank you for listening!

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