



Technical Circular

No. 019/2020

Date: 24th March 2020

Subject: Marshall Islands – Marine Safety Advisory No. 11-20 on Handling ISM, ISPS, and MLC, 2006 due to the exceptional circumstances of Novel Coronavirus, COVID-19

1. The Marshall Islands Administration vide Marine Safety Advisory No. 11-20 (copy attached) has provided information on alternative arrangements where an auditor or inspector cannot attend due to restrictions imposed as a result of the COVID-19 pandemic.
2. The alternative arrangements provided are applicable to inspections, audits and verifications coming due **prior to 01 July 2020**. Except as otherwise stated within the MSA, Recognized Organization (RO) or Recognized Security Organization (RSO) are required to inform and obtain concurrence from the Republic of the Marshall Islands (RMI) Maritime Administrator when utilizing these alternatives.
 - a. **International Safety Management (ISM) Code:**
 - i. **Internal Annual ISM Verification:** The Administrator will allow for a three-month extension to the 12-month interval for shore side and shipboard internal audits. Also for audits to be carried out during the extension period, the Administrator will accept a remote audit in lieu of a physical audit if it meets the requirements of the ISM Code.
 - ii. **External Initial ISM Verification:** The Administrator will authorize an extension of the Interim Safety Management Certificate (SMC) in accordance with ISM Code §14.3. The validity will be for the minimum period required to complete the initial verification.
 - iii. **Intermediate ISM Verification:** The Administrator will authorize the issuance of a short-term SMC that is valid for a period of no longer than three months. Supporting documentation from the RO must show that the Company's original request for the verification was made prior to the SMC's third anniversary date.
 - iv. **External Renewal ISM Verification:** The Administrator will authorize an extension of the SMC for no longer than three months in accordance with ISM Code §13.14.

v. **Document of Compliance Verification:** Where a Company cannot complete the required Document of Compliance (DOC) verifications in accordance with ISM Code, the Administrator will authorize the issuance of a short-term DOC. This will be handled on a case-by-case basis upon a recommendation from the RO.

b. International Ship and Port Facility Security (ISPS) Code:

i. **Internal Annual ISPS Verification:** The Administrator will allow for a three-month extension to the 12-month interval for shore side and shipboard internal audits.

ii. **Initial ISPS Verification:** The Administrator will authorize a consecutive Interim International Ship Security Certificate (ISSC) in accordance with ISPS Code A-19.4.5. The validity will be for the minimum period required to complete the initial verification.

iii. **Intermediate ISPS Verification:** The Administrator will authorize the issuance of a short-term ISSC that is valid for a period of no longer than three months. Supporting documentation from the RSO must show that the Company's original request for the verification was made prior to the ISSC's third anniversary date.

iv. **Renewal ISPS Verification:** The Administrator will authorize an extension of the ISSC for no longer than three months in accordance with ISPS Code A-19.3.5.

c. Maritime Labour Convention, 2006 (MLC, 2006):

MLC, 2006 does not provide for the extension of initial, intermediate, or renewal inspections. However, where there is adequate justification and supporting documentation that an inspector is unable to attend, a short-term certificate may be issued. The validity will be for the minimum period required to complete the required inspection.

3. Ship owners/ operators and masters of Marshall Islands flagged ships are advised to be guided by above.

Enclosure:

Marshall Islands Marine Safety Advisory No. 11-20, dated 20 March 2020.

Whilst the utmost care has been taken in the compilation of the Technical Information, neither Indian Register of Shipping, its affiliates and subsidiaries if any, nor any of its directors, officers, employees or agents assume any responsibility and shall not be liable to any person for any loss, damage or expense caused in any manner whatsoever by reliance on the information in this document.