



Technical Circular

No.: 102/2020

Date: 13th July 2020

Subject: Marshall Islands – Marine Safety Advisory No. 25-20 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. 25-20 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. Except as otherwise stated within the Safety Advisory, 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. No further authorization to carry out a remote internal audit is required from the Administrator. This may also be applied to internal audits which are required to be completed prior to the external verification.
 - 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. 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 ISPS Code. No further authorization to carry out a remote internal audit is required from the Administrator. This may also be applied to internal audits which are required to be completed prior to the external verification.
- 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.

d. Remote External Verifications:

Remote external verifications are audits conducted using Information and Communication Technology (ICT) where physical attendance to the site being audited is not possible.

Remote external verifications will be considered on a **case-by-case basis** as a temporary alternative method when the traditional on-site audit is not possible due to the COVID-19 pandemic and options, such as an extension or reissuance of an expiring certificate, have been exhausted. Examples include expiring interim certificates, intermediate audit windows closing, and annual and renewal audits coming due.

An RO or RSO must request Administrator authorization to conduct a remote external verifications.

3. Ship owners/ operators and masters of Marshall Islands flagged ships are advised to be guided by above.
4. **This Technical Circular supersedes and revokes earlier Technical Circular No. 019/2020, dated 24 March 2020.**

Enclosure:

Marshall Islands Marine Safety Advisory No. 25-20, dated 02July 2020.

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MARINE SAFETY ADVISORY No. 25-20

To: Owners/Operators, Masters, Nautical Inspectors, Recognized Organizations

Subject: HANDLING ISM, ISPS, AND MLC, 2006 DUE TO THE EXCEPTIONAL CIRCUMSTANCE OF COVID-19

Date: 02 July 2020

This Marine Safety Advisory (MSA) supersedes MSA No. 11-20. Please note that §1.1 has been updated to provide further clarification and §4.0 has been added.

This MSA provides information on alternative arrangements where an auditor or inspector cannot attend due to restrictions imposed as a result of the Coronavirus disease (COVID-19) pandemic. Except as otherwise stated within this MSA, a Recognized Organization (RO) or Recognized Security Organization (RSO) must inform and obtain concurrence from the Republic of the Marshall Islands (RMI) Maritime Administrator (the “Administrator”) when utilizing these alternatives.

1.0 International Safety Management (ISM) Code

1.1 Internal Annual ISM Verification

The Administrator will allow for a three-month extension to the 12-month interval for shoreside and shipboard internal audits, as it has determined that COVID-19 constitutes an *exceptional circumstance* for the purposes of §7.4 of RMI Marine Notice [2-011-13](#) and ISM Code §12.1. In the affected cases, the audit may be postponed for up to three months without further authorization from the Administrator.

For audits to be carried out during the three-month extension period, the Administrator will accept a remote audit in lieu of a physical audit if it meets all the requirements of ISM Code §12. No further authorization to carry out a remote internal audit is required from the Administrator. This may also be applied to internal audits which are required to be completed prior to the external verification.

1.2 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.

This MSA expires one (1) year after its issuance, unless otherwise noted, extended, superseded, or revoked.

1.3 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.

1.4 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.

1.5 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.

2.0 International Ship and Port Facility Security (ISPS) Code

2.1 Internal Annual ISPS Verification

Refer to §1.1 of this MSA.

2.2 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.

2.3 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.

2.4 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.

3.0 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.

4.0 Remote External Verifications

Remote external verifications are audits conducted using Information and Communication Technology (ICT) where physical attendance to the site being audited is not possible.

Remote external verifications will be considered on a case-by-case basis as a temporary alternative method when the traditional on-site audit is not possible due to the COVID-19 pandemic and options, such as an extension or reissuance of an expiring certificate, have been exhausted (see §1.0, §2.0 and §3.0 of this MSA). Examples include expiring interim certificates, intermediate audit windows closing, and annual and renewal audits coming due.

An RO or RSO must request Administrator authorization to conduct an remote external verifications as defined in this section.

5.0 Contact

All queries regarding information in this MSA should be sent to the Administrator at: technical@register-iri.com.