

Republic of the Marshall Islands

MARITIME ADMINISTRATOR

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MARINE SAFETY ADVISORY No. 11-20

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

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

Date: 26 March 2020

Please note that §1.1 has been updated to provide further clarification.

This Marine Safety Advisory (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. It applies to inspections, audits, and verifications coming due prior to 01 July 2020. 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 in Part A of §12 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.

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This MSA expires one (1) year after its issuance, unless otherwise noted, extended, superseded, or revoked.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

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