

ISM & ISPS pocket checklist

Reducing the risk of Port State Control detentions

In conjunction with: **UK P&I CLUB** 



**Lloyd's
Register**

LIFE MATTERS

Introduction

Port State Control detentions due to ISM failures are becoming more common as the authorities are grouping deficiencies together to justify detaining the ship. The objectives of the International Safety Management (ISM) Code are to ensure safety at sea, prevention of human injury or loss of life, and avoidance of damage to the environment and property. The objectives of the ISPS Code are to ensure security of ships and port facilities. The company is responsible for implementing an effective safety and security management system to ensure these objectives are met. By doing this, the risk to the fleet can be minimised and avoid costly fines and Port State Control detentions. Effective implementation of ISM and ISPS will protect the fleet's reputation and help to get most out of the company's resources.

In conjunction with an industry partner, the UK P&I Club, we have analysed data including deficiencies found by Port State Control Officers relating to ISM & ISPS. The result is this convenient and re-usable Checklist, highlighting the most common deficiencies.

To help reduce these risks, as a minimum, the items on the chart on page 4 should be included as part of your final checks prior to voyage and port entry to ensure they continue to conform to international convention requirements. It is strongly advised that all items in this aide memoire are checked on an ongoing basis to supplement your own operational and maintenance procedures and your flag State's requirements.

This is the fifth in a series of pocket checklists to help you comply with international convention requirements. For information about other checklists in this series please visit www.webstore.lr.org or www.ukpandi.com

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Are you prepared for a Port State Control Inspection?

PSC officers always commence their inspection in the Master's office. It is essential that certification is up to date, original and valid. All other necessary documents and manuals should, where required, be approved and onboard.

If equipment is broken or missing, or the ship has suffered damage en-route, the Master must notify the port authorities prior to port entry. If the port authorities are informed of the problem and of any permanent or temporary remedies agreed with the flag State, the vessel should not be detained. However, if notice is not given before entry, the Port State has clear grounds for inspection, possibly leading to a detention.

If your ship is detained, or appears to be in the process of being detained, you should contact the nearest Lloyd's Register Group office immediately for assistance.

The major PSC organisations publish their criteria for targeting a ship on their web sites. Ship owners and operators should use these criteria to calculate the target rating of their ships.

Paris MOU - **www.parismou.org**

Tokyo MOU - **www.tokyo-mou.org**

USCG - **<http://homeport.uscg.mil/mycg/portal/ep/home.do>**

Other MOUs include Abuja, Black Sea, Caribbean, Indian Ocean, Mediterranean, Riyadh and Vina del Mar.

A ship operator may disagree with the findings of the PSC Authority and the majority of the regional PSC organisations have guidelines on how to appeal against a detention. These can also be found on the above web sites.

IMO Procedures for Port State Control, Appendix 1 also provides guidelines on detentions [ISBN: 92-801-5099-5].

ISM & ISPS deficiencies

The following are the most common ISM/ISPS deficiencies (by number) found by Port State Control officers during the period 2007-2009 on ships classed by Lloyd's Register.



1. First Impression

The first impression the Port State Authority gain is very important. It will set the scene for any inspections that take place. Take note of:

1. ■ Gangway & moorings

- in good condition
- rigged as required (e.g. wires, steps, gangway net, bottom stanchions, man ropes)
- clean (e.g. no grease from fall wires on steps, handrails, manropes)

2. ■ Access control

- identification check (check for photo ID)
- visitors log maintained
- restricted areas controlled

3. ■ Appearance of gangway watch, officers and crew

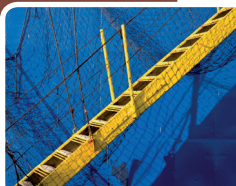
- neat working clothes
- appropriate personal protective equipment
- professional attitude

4. ■ Appearance of accommodation and outside decks

- clean
- tidy
- well illuminated
- non slip walkways on outside deck

5. ■ PSC officer should be accompanied by senior officer(s) during inspection, tour of the vessel etc.

- the accompanying officer(s) should have keys readily available to access secured areas and lockers



Rigged gangway

2. Certificates and Documents

Certificates and documents must be valid, carried onboard and available for review.

Certificates:

1. ☐ All required classification, statutory and other trading certificates are readily available
2. ☐ A copy of the company's document of compliance (DoC) with the endorsements for annual verifications
3. ☐ Safety Management Certificate (SMC)
4. ☐ International Ships Security Certificate (ISSC)
5. ☐ The latest issue of the Continuous Synopsis Record (CSR) is available and valid (see also Note 1). The file of previously issued CSR's is complete

Notes:

1. The name, Company ID number and address of the Company and ship type must be the same on SMC, DoC, ISSC and CSR.
2. Reference to required certification and documentation can be found in MSC/ Circular.1151 (as amended or superseded).

2. Certificates and Documents - continued

Documents:

6. ☐ All ISM manuals, procedures and instructions are available in the latest revisions
7. ☐ A copy of the company's Safety and Environmental policy is available
8. ☐ All records required by the ISM procedures are available and completed as required
9. ☐ Ship's library, documentation and manuals are valid, complete and available as applicable and as required by the procedures and Flag
10. ☐ The approved Ship Security Plan (SSP) is available, including evidence of the approval (Approval Letter and Report)

Notes:

1. The relevant procedures, instructions and records must be in the working language or languages understood by all personnel.
2. Evidence that the SSP has been submitted for approval may be acceptable in special circumstances.
3. All officers and crew should have access to the relevant procedures and instructions, including the Life Saving Appliances and Fire Safety training manuals that should be available in the officers and crew lounges.
4. It is recommended that notice boards are kept up to date to highlight safety bulletins, procedural changes, contact details, work and rest hours and other relevant information.

3. System Management

The effectiveness of the Safety Management System is to be analysed and reviewed. Opportunities for improvement of the system are to be identified and implemented. The following are some of the key aspects to achieve this:

1. ☐ The Master's Reviews are carried out as required and relevant identified action items are addressed
2. ☐ Internal audits are held as required by the Management System, at intervals not exceeding twelve months. Reports are to be made available on board
3. ☐ External audits are held as required by the ISM Code, reports are available on Board
4. ☐ Procedures for reporting non-conformities, accidents, incidents and near misses, analysis and follow-up are implemented. Required corrective and preventive actions are carried out and verified for satisfactory implementation
5. ☐ All identified risks to its ships, personnel and the environment are assessed and appropriate safeguards established. Evidence of the risk assessments need to be available ISM & ISPS



Reviewing the Safety Management System

4. Resources and Personnel

Ensuring that personnel are competent, qualified, medically fit, well rested and fully familiar with their duties and responsibilities is a key aspect of an effective safety management system.

1. ☐ **The number of personnel meets the requirements of the Minimum Safe Manning Certificates**
2. ☐ **Up-to-date crew list is available**
3. ☐ **Standards of Training, Certification & Watchkeeping (STCW) certification is available as required for all personnel**
4. ☐ **Medical fitness certificates are available for all personnel**
5. ☐ **Crew members have received familiarization and other required training**
6. ☐ **Crew members are familiar with:**
 - the company's safety and environmental protection policy
 - their duties and responsibilities as identified in the Safety Management System (SMS) and in the Ship Security Plan (SSP)
 - officers are familiar with the identity, duties and contact details of the Designated Person Ashore (DPA)
7. ☐ **The Ship Security Officer (SSO) is trained and certified in accordance with STCW requirements and is familiar with his or her duties**

4. Resources and Personnel - continued

- 8. ☐ All personnel can communicate effectively in the working language of the ship or another language readily understood
- 9. ☐ Work and rest hours are as required and accurate records are available
- 10. ☐ Master's responsibility and authority is clearly defined, documented and understood

Notes:

- 1. All required certification and seafarer documentation should be available as originals.
- 2. STCW certification includes Certificates of Competency, Flag State Endorsements or evidence of application for same / Confirmation of Receipt of Application, ship type specific endorsements.
- 3. Evidence is to be available to show all seafarers have received the necessary training for all their duties, including shipboard specific duties. Records of familiarisation when joining the vessel should also be kept.

Alert! is a quarterly newsletter raising human element awareness initiative. Alert! and an associated web site **www.he-alert.org** describes and illustrate the human element within every aspect of the maritime industry, from equipment manufacturers to ship owners to naval architects to seafarers.

5. Inspection and Maintenance

Maintenance of the ship and equipment is the most common ISM deficiency found by Port State Control. The ship and all equipment are to be inspected regularly, well maintained and ready for operation at all times.

1. ■ **Inspection and preventative maintenance of all equipment, machinery and structures are carried out as required by the Management System**
2. ■ **Maintenance and inspection routines are carried out by competent officers / personnel and under supervision of heads of department**
3. ■ **All Life Saving Appliances and Fire Fighting Equipment are in good working condition and ready for immediate use**
4. ■ **Records of inspection, maintenance, testing and calibration are readily available**



Maintenance and inspection routines

5. Inspection and Maintenance - continued

Maintenance of the ship and equipment is the most common ISM deficiency found by Port State Control. The ship and all equipment are to be inspected regularly, well maintained and ready for operation at all times.

5. ☐ **Identified defects and deficiencies are acted on promptly and their status is controlled, including the appropriate follow up**
6. ☐ **Defects and deficiencies have been reported to the company, class society, flag administration, Recognized Organisation and/or port authorities as necessary**
7. ☐ **Sufficient spare parts are available in accordance with the requirements of the management system for the safe operation of the vessel**
8. ☐ **The status of requisitions is controlled**
9. ☐ **Housekeeping, cleanliness and hygiene are satisfactory in all areas**
10. ☐ **Equipment and technical systems, the sudden operational failure of which may result in hazardous situations, has been identified and the maintenance is carried out as required and sufficient spare parts are available**

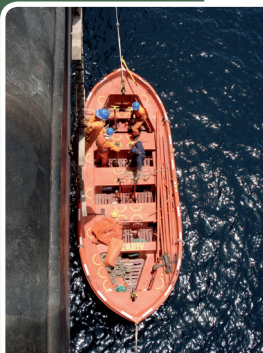
Note:

Details of some of the above points can be found in the other Pocket checklists produced by Lloyd's Register; Port State Inspections, Life Saving appliances, Marine Fire Safety & Marine Pollution Prevention – all available from **www.webstore.lr.org** or **www.ukpandi.com**

6. Emergency Preparedness

All seafarers are to be fully familiar with their duties and responsibilities in an emergency situation and all emergency equipment is to be well maintained and ready for use.

1. ☐ **Procedures are available for all potential emergency situations**
2. ☐ **The Muster List is up to date and meets SOLAS requirements**
3. ☐ **Fire Control plans are up to date and reflect the equipment on board. Fire plans are identical in all locations**
4. ☐ **All personnel are familiar with:**
 - the alarm signals
 - their muster station
 - their duties in case of an emergency
5. ☐ **A programme for Drills and Exercises is in place (Including all identified potential emergency situations)**
6. ☐ **Drills and exercises are held and documented as required**



Lifeboat drill

6. Emergency Preparedness - continued

7. ☐ **Drills and exercises are relevant, reviewed on completion and learning points are identified**
8. ☐ **All emergency equipment is well maintained and ready for use**
9. ☐ **Emergency escapes are free from any obstruction**
10. ☐ **Emergency contact details for the company are readily available**
11. ☐ **Emergency contact details for the port – including Agent, P&I Club, Port control/Harbour Master, Pollution control and emergency services are readily available**

Notes:

1. The Muster List must include all details required by SOLAS Ch III Reg 37, including clearly identified responsibilities and duties, defined substitutes for key personnel and the identification of the officer(s) responsible for maintenance and inspection of Life Saving Appliances and Fire Fighting Equipment.

Drill notes:

1. Some PSC Officers will require crew to carry out abandon ship and fire drills. Crew must be able to demonstrate familiarity with the equipment and be able to carry out their duties quickly and competently.
2. It's advisable to use different scenarios when carrying out drills so that the crew is ready and prepared for different emergency situations. Ensure that details of these drills are recorded.
3. Photographic records with dates as evidence of drills being held can be used.

7. Shipboard Operations

Procedures, plans and instructions are to be established and implemented for key shipboard operations concerning the safety of the personnel, ship and protection of the environment.

1. ☐ **Procedures are available for all key shipboard operations**
2. ☐ **Responsibilities and duties are clearly assigned to qualified personnel**
3. ☐ **All personnel are familiar with their duties and responsibilities**
4. ☐ **Procedures are implemented effectively and records maintained as required**

Notes:

Examples of key shipboard operations include, but are not restricted to:

- cargo and ballast operations
- voyage planning and navigation
- pre-arrival and departure checks
- watch keeping
- bunkering operations
- management of oily residues, sludge and oily water
- safe working procedures such as e.g. enclosed space entry, working aloft / over the side, hot work, etc.
- garbage handling



Keeping charts up to date

8. ISPS

Ship Security controls are to be established and implemented at all times.

1. ☐ Access control procedures are clearly implemented and the personnel in charge of access control are familiar with their duties
2. ☐ The Ship Security Plan (SSP) and related records are protected from unauthorized access or disclosure
3. ☐ The relevant officers are aware to which parts of the SSP limited access may be allowed (see ISPS Code)
4. ☐ The Security Level is set correctly as required by the Flag State and Port Authorities and all personnel are aware of the current level
5. ☐ Ship's stores are checked on receipt and stowed promptly, in accordance with levels set by SSP
6. ☐ All security equipment is maintained, calibrated and tested as required by their manuals and the SSP Gangway watch



8. ISPS - continued

7. ☐ Drills are carried out regularly as per ISPS Code and SSP
8. ☐ Restricted areas are clearly identified and marked as required by the SSP. Access to and activity within Restricted Areas is controlled as required by the SSP
9. ☐ Searches are carried out in accordance with the level set by the SSP
10. ☐ Ship Security Alert System (SSAS) is operational and records for tests and maintenance available
11. ☐ Company Security Officer (CSO) or designated representative is available at all times. The CSO can be readily identified by SSO and applicable officers and crew. Contact details are available
12. ☐ Security arrangements do not compromise safety, see notes
13. ☐ Records are maintained and retained as required by the SSP and ISPS Code A 10.1

Notes:

1. Securing arrangements should not prevent immediate access to Life Saving Appliances, Fire Fighting Equipment and SOPEP materials in an emergency situation.
2. It must be possible to open doors along escape routes from both sides (MSC Circular 847, regulation 45 refers). This includes emergency escapes and doors to the accommodation and wheelhouse.

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The UK P&I Club is the world's largest mutual P&I club currently insuring over 170 million gross tons of owned and chartered shipping in 60 countries.

The Club publishes loss prevention material through a wide range of media on topics such as hazardous cargo in containers, human error, personal injury and maritime security.

The full range of Club activities can be viewed at www.ukpandi.com

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Safety Management System
Handbook for ISM Audits

(Applicable to Non-Japanese Flag Ships)

(Reference for Ship Management Companies)

ClassNK

NIPPON KAIJI KYOKAI

Ship Management Systems Department

January 2024

18th Edition

Record of Revisions

Date	Edition	Major points of Revision
1 Oct 2016	15 th	- Handling procedures for Major non-conformities are revised. - Submission of Outline of the Company and a brief description of its business activities are stipulated and latest information is incorporated.
Sep 2019	16 th (HP.)	- In accordance with revision of IACS PR 9, kind of Audit was changed at timing of change of ship's flag. - Revised the issuance of full term certificate in Branch/Overseas offices. - The procedure for CAP was revised.
Feb 2022	17 th (HP.)	-Revised description due to introduction of electronic audit records.
Jan 2024	18 th (HP.)	-Clause 7.1 was revised.

Note: (HP.) means this edition appears only on the Web Site. (No booklet issued.)

The Society's Home Page (www.classnk.or.jp)

HOME→Products & Services→Statutory Services→Safety Management Systems (ISM)

Regarding the jurisdiction of each Branch or Office of the Society

Please refer to the "DIRECTORY" which is published by the Society. Note: an updated version of the same is available on the Society's web site.

HOME→See and Learn→Directory

For any questions about this "Handbook" please do not hesitate to contact the Ship Management Systems Department of the Society (ClassNK) Head Office, Information Center.

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Handbook for ISM Audits (18h Edition)

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Abbreviations

- IACS:** International Association of Classification Societies
Members (12) are ABS, BV, CCS, CRS, DNV-GL, IRS, KR, LR, NK, PRS, RINA and RS.
- IMO:** International Maritime Organization
Inter-Governmental Organization under the United Nations, concerning maritime activities
- ISM Code:** International Safety Management (ISM) Code
The full name is "International Management Code for the Safe Operation of Ships and for Pollution Prevention", it was adopted as IMO Resolution A.741 (18) on the 4th of November 1993 and it has become a mandatory code under SOLAS Chapter IX. The same was revised on 21st June 2013 finally and the latest ISM Code came into force on the 1st of January 2015. (IMO Resolution MSC.353 (92))
- Offices:** Branches and / or Offices of ClassNK
- DOC:** Document of Compliance
A certificate issued to a Company under the authority of the Government of a Flag State
- SMC:** Safety Management Certificate
A certificate issued to a Ship under the authority of the Government of the Flag State
- SMS:** Safety Management System
A structured and documented system enabling Company personnel to implement effectively the Company safety environmental protection policy
- SOLAS:** International Convention for the Safety of Life at Sea
- TCMS:** Transfer of Certification of Management Systems

Definitions of Specific words & Abbreviations

Major Non-conformity:

An identifiable deviation which poses a serious threat to personnel or ship safety or a serious risk to the environment and requires immediate corrective action; in addition, the lack of effective and systematic implementation of a requirement of the ISM code is also considered a major non-conformity. (Hereinafter referred to as MNC)

Non-conformity which remains after downgrading a MNC: (Hereinafter referred to as DNC)

Non-conformity:

An observed situation where objective evidence indicates the non-fulfillment of a specific requirement. Namely, when objective evidence, which substantiates the non-fulfillment of a specific requirement of the Company's SMS, the ISM Code, or Rules and Regulations are found, the matter shall be judged as a Non-conformity. (Hereinafter referred to as NC)

Observation:

A statement of fact made during a safety management Audit and substantiated by objective evidence referring to ISM Code. It may also be a statement made by the Auditor referring to a weakness or potential deficiency in the SMS which, if not corrected, may lead to a non-conformity in the future. (Hereinafter referred to as OBS)

Anniversary date:

The day and month of each year that corresponds to the date of expiry of the DOC or SMC.

Introduction

Having been motivated by a number of major marine casualties experienced during the 1980s and thereafter, the ISM Code was drawn up by the IMO recognizing that systematically organized and documented shipping practices integrating shore-based management and ships are indispensable for the safe operation of ships and for protection of marine environment. The ISM Code was adopted as IMO Resolution A.741 (18) on 4th November, 1993 and it became a mandatory code, from 1st July 1998 for some ship types and as from 1st July 2002 for all ship types, as per SOLAS Chapter IX.

Any ship management company must structure a SMS, which meets the requirements of the ISM Code and it should be documented, implemented and maintained. The company should then obtain a DOC for the main office and SMC(s) for their Ship(s), upon satisfactory completion of Audits conducted by the Flag Administration, otherwise the Company is not legally able to engage in any International Shipping business.

ClassNK is authorized to conduct such Audits and issue ISM Code Certificates on behalf of the Flag State Administrations of more than 80 Governments, at present (as of February 2022).

ClassNK conducts the ISM Code Audits and issues the Certificates in accordance with the Rules established by ClassNK (see Note below) and the Procedural Requirements No.10 (PR.10) of IACS, which are based on the "Revised ISM Code*" and the IMO Resolution A.1118(30) "Guidelines on the Implementation of the International Safety Management (ISM) Code by Administrations*". And ClassNK shall enter data of the Companies and the Ships in the "Register of Company and Ship for Safety Management Systems" of ClassNK and publish it.

- *: The parts concerning "Certification and Verification" of the former "Guidelines" (Res. A.788(19)) were integrated into the "Revised ISM Code", and the "Forms of Certificates" and the "Validity of Certificates" issued after Renewal Audit have been specified clearly. The remaining parts of the former "Guidelines" have been rearranged three times as a new "Guidelines" (Res. A. 1118(30)).

Note: Rules and Guidance for the Audit and Registration of Safety Management Systems
(Available on "Rules & Guidance" of the ClassNK Home Page)

ClassNK have been promoting our services to digitization, and from 30 January 2022, the reports after completion of ISM audit would be issued electronically and send to the management company.

1. Ship Type and Application of the ISM Code

The date of mandatory application of the ISM Code for each ship type is specified in Regulation 2, Chapter IX of the SOLAS Convention.

(1) Ship Types for which the ISM Code came into force on 1st July 1998

Passenger ships

Passenger high-speed craft

Cargo high-speed craft of 500 gross tonnage and over

Bulk carriers of 500 gross tonnage and over

Oil tankers of 500 gross tonnage and over

Chemical tankers of 500 gross tonnage and over

Gas carriers of 500 gross tonnage and over

(2) Ship Types for which the ISM Code came into force on 1st July 2002

Mobile offshore drilling units of 500 gross tonnage and over

Other cargo ships of 500 gross tonnage and over

(Cargo ships other than those specified in (1) above)

Reference only:

SOLAS Convention regulations on its application are as follows; (Annex to the Convention)

- Regulations apply only to ships engaged on international voyages. (Reg.1(a), Chapter I)
- A passenger ship is a ship which carries more than twelve passengers. (Reg.2(f), Chapter I)
- A cargo ship is any ship which is not a passenger ship. (Reg.2(g), Chapter I)
- Regulations do not apply to cargo ships of less than 500 gross tonnage. (Reg.3(a), Chapter I)

(3) Definitions of Bulk Carrier

The ship types in terms of the ISM Code are to be those defined in SOLAS Chapter IX therefore some of "Bulk carriers" defined in SOLAS Chapter XII may be "Other cargo ship" in terms of the ISM Code.

"Bulk carriers" in terms of the ISM Code shall be confirmed according to the definition of Bulk carriers specified in SOLAS IX/1.6, i.e. ships constructed with single deck, top-side tanks and hopper side tanks in cargo spaces and intended primarily to carry dry cargo in bulk; or ore carrier; or combination carrier. In general, ships assigned "ESP" within the Class Notation are "Bulk carrier" in terms of the ISM Code otherwise "Other cargo ship" in terms of the ISM Code.

However, it is to be confirmed whether or not the instruction from a flag state on the application of the Resolution MSC.277 (85) "Clarification of the term "Bulk Carrier" and guidance for application of regulations in SOLAS to ships which occasionally carry dry cargoes in bulk" has been adopted on case by case basis. Further, some "Other cargo ship" is assigned with "ESP" at the owner's option.

2. Certificates

2.1. Certificates issued to a Company

Certificates, which may be issued to a Company, are as follows;

(1) Interim DOC:

An interim DOC issued to a Company which has no practical operational experience of its SMS.

(2) DOC:

A full-term Certificate issued under the authority of the Flag Administration.

(3) Short-term DOC:

A short-term Certificate issued to cover the period until a full-term DOC is issued.
(When the Flag Administration issues a full-term DOC)

2.1.1. Interim DOC

An Interim DOC may be issued in the following cases.

(1) In the case of a newly established Company

(2) In the case of Addition of a Ship Type(s)

In case a Company, who is in possession of a DOC issued by ClassNK, applies its SMS to new ship type(s) which are not stated on the existing DOC.

Interim DOC shall be issued by an *Office* of ClassNK. The period of validity of the Interim DOC shall be twelve months.

The Company shall undergo an Initial Audit in case of **a newly established Company** or shall undergo an Additional Audit in case of **Addition of Ship Type**, to obtain a DOC within the validity of the Interim DOC.

Note: In the case of a newly established Company, further Document Review for the Manual and Procedures should be conducted prior to the Audit on site. In this regard, the Application for the Initial Audit should be forwarded one month before the intended date.

2.1.2. DOC

DOC(s) shall be issued to a Company by the Flag Administration or the *Office* of ClassNK under the authority of the Flag Administration, upon successful completion of an Initial Audit. At the Audit, the SMS of the company and at least one ship of each ship type covered by the SMS should have been in operation for at least three months. And also, the internal Audits for them should have been carried out. Then, when a Company manages a plural flag fleet, a plural number of DOCs shall be issued.

The period of validity of a DOC, issued after Initial Audit, shall be five years from the last date of the Audit subject to Annual Audit carried out yearly. As for Renewal Audit, when the same is completed within three months before the expiry date of an existing DOC, the period of validity of the new DOC shall be five years from the expiry date of the existing DOC. When the Renewal Audit is completed more than three months before the expiry of an existing DOC, the new DOC shall be valid from the date of completion of the Renewal Audit for a period of five years.

DOCs shall be endorsed upon the successful completion of an Annual Audit.

The original of DOCs shall be kept at the Company and a copy of the DOC with endorsement for the Annual Audit shall be placed on board of each ship covered by the SMS.

2.1.3. Short term DOC

When the Flag Administration issues a full-term DOC, a short-term DOC(s) valid for five months shall be issued to a Company on the last date of Audit by the *Office* of ClassNK as a proof of satisfactory completion of the Initial Audit or Renewal Audit.

2.2. Certificates issued to a Ship

Certificate, which may be issued to a ship, is as follows;

(1) Interim SMC:

An interim SMC is issued to a ship which has no practical operational experience of the SMS.

(2) SMC:

A full-term Certificate issued under the authority of a Flag State Government.

(3) Short-term SMC:

A short-term Certificate issued to cover the period until a full-term SMC is issued. (When the Flag Administration issues a full-term SMC)

2.2.1. Interim SMC

An Interim SMC may be issued in the following cases;

(1) a newly built ship;

(2) a ship for which the management Company has changed;

(3) a ship to which SOLAS IX applies as mandatory requirements due to conversion, change of navigation area, etc; or

(4) a ship for which the flag has been changed.

The period of validity of an Interim SMC shall be six months. In special cases the validity of an Interim SMC may be extended for a further six months maximum, provided the Flag permission to do so.

The ship shall undergo Initial Audit to obtain a SMC within the validity of the Interim SMC.

2.2.2. SMC

A SMC shall be issued to a ship, which is managed by a Company who is in possession of DOC (not Interim DOC), by the Flag Administration or the *Office* of ClassNK under the authority of the Flag Administration upon successful completion of an Initial Audit. At the Audit, the Company's SMS should have been in operation for at least three months in the shipboard. And also, the Internal Audits should have been carried out.

The period of validity of a SMC, issued after Initial Audit, shall be five years from the last date of the Audit, subject to an Intermediate Audit carried out between the second and third anniversary date. As for Renewal Audit, when the same is completed within three months before the expiry date of the existing SMC, the period of validity of the new SMC shall be five years from the expiry date of the existing SMC.

When the Renewal Audit is completed more than three months before the expiry date of existing SMC, the new SMC shall be valid from the date of completion of Renewal Audit for a period of five years. A SMC shall be endorsed upon the successful completion of an Intermediate Audit.

The original of the SMC shall be placed on board and a copy of the SMC shall be kept by the Company.

2.2.3. Short term SMC

When the Flag Administration issues a full-term SMC, a Short-term SMC valid for five months shall be issued to a ship on the last date of the Audit by the *Office* of ClassNK as a proof of satisfactory completion of an Initial Audit or a Renewal Audit.

2.3. Other Certificates

An NKSMC shall be issued for a ship that flies the flag of a State who has not authorized ClassNK for ISM Certification, or the flag of a State who is not a Contracting Government of the SOLAS Convention, by the *Office* of ClassNK, or ship(s) who is not applied provision SOLAS Convention. An NKDOC shall be issued for the Company which manages the ship(s).

2.4. Extension, Revising an Entry, Invalidation and Returning of Certificates

2.4.1. Extension of Certificates

The validity of Interim SMC is allowed to be extended for a further six months maximum, provided the flag permission to do so, in special cases.

If a ship at the time when a SMC expires is not in a port in which it is to be verified, the period of validity of the SMC may be extended for no longer than three months with the Flag permission.

2.4.2. Revising an Entry on a Certificate

When the particulars, such as ship's name, mentioned in the SMC are changed, an Additional Audit to rewrite the SMC is required. Also please be advised that in case of a change of Company's name and/or Address, an Additional Audit to rewrite the DOC is required. Further, a rewrite of SMC which has been issued by ClassNK is required.

2.4.3. Invalidation of a DOC

A DOC shall become invalid when;

- (1) a Company has not undergone an Annual Audit within the designated period of time;
- (2) there is evidence of an unresolved MNC;
- (3) corrective actions for NCs are not completed within the agreed schedule;
- (4) amendments to the ISM Code are not taken into account by the Company;
- (5) when Audit fees and expenses have not been paid by the Company.

2.4.4. Invalidation of a SMC

A SMC shall become invalid when;

- (1) a Company has not undergone an Intermediate Audit of that ship within the designated period of time;
- (2) there is evidence of an unresolved MNC;
- (3) corrective actions plan (CAP) for NCs are not submitted or completed within the agreed schedule;
- (4) amendments to the ISM Code are not taken into account by the Company;
- (5) the DOC of the Company is invalidated;
- (6) a ship is not provided with the trading certificates necessary for her operation;
- (7) a ship is not maintaining the classification of ClassNK or other Society acknowledged by ClassNK;
- (8) when Audit fees and expenses have not been paid by the Company.

2.4.5. Returning of Certificates

A Company is requested to return a Certificate when;

- (1) a new Certificate has been issued due to Renewal, revised entry and so on;
- (2) a certificate has become invalid or has expired ;
- (3) a Company has terminated the management of ship(s) due to sale or scrap of the ship(s)

3. Audit

3.1. Purposes of Audit

Purposes of Audits are to verify compliance of with the requirements of the ISM Code and, through the verification, to support and encourage Companies in achieving safety management objectives, which are:

- (1) to provide for safe practices in ship operation and a safe working environment;
- (2) to establish safeguards against all identified risks based on the assessment; and
- (3) to continuously improve the safety-management skills of personnel ashore and aboard.

3.2. Type of Company Audit and its Timing

Company Audits consists of following;

- (1) **Audit for issuing Interim DOC:**
Shall be conducted for a newly established Company or addition of ship type
- (2) **Initial Audit:**
Shall be conducted to issue a DOC for a Company for the first time.
- (3) **Annual Audit:**
Shall be conducted every year between three months before and after each anniversary date.
- (4) **Renewal Audit:**
Shall be conducted within three months*¹ before the expiry date of the existing DOC.
- (5) **Additional Audit:**
Shall be conducted to verify effective actions are taken for MNC as necessary (Refer to 6.2), and whenever needed. (Refer to 4.5)

*¹: Regarding a Renewal Audit completed more than three months before the expiry date of existing DOC, please refer to 2.1.1.

3.3. Type of Shipboard Audit and its Timing

Shipboard Audits consists of following;

- (1) **Audit for issuing an Interim SMC:**
Shall be conducted to issue an Interim SMC for a ship which has not operated or for a ship which the flag has been changed
- (2) **Initial Audit:**
Shall be conducted to issue a SMC for a Ship for the first time
- (3) **Intermediate Audit:**
Shall be conducted between the second and third anniversary date (within twelve months)
- (4) **Renewal Audit:**
Shall be conducted within three months*¹ before the expiry date of the existing SMC
- (5) **Additional Audit:**
Shall be conducted to verify effective actions are taken for MNC as necessary (Refer to 6.2), and whenever needed. (Refer to 5.3)

*¹: Regarding a Renewal Audit completed more than three months before the expiry date of existing SMC, please refer to 2.2.1.

3.4. Application for Audit

3.4.1. Application for Company Audit

The Company is requested to apply through e-Application, Web Service Portal on our website, or submit the application for company audit (Form-APPLI-C).

Please refer to e-Application on our web site.

An Application Form for Company Audit of SMS (Form APPLI-C) available from "Download" of the Society's Home Page

The Company is requested to submit the Application for Company Audit to an *Office* of ClassNK having jurisdiction over the area of the Company, attaching the following documents. ~~You can~~

Any Application for new entry, i.e. Issuing Interim DOC for newly established company or Transfer of DOC from another IACS Society, is to be assessed at Head Office. Therefore the Company is kindly advised to contact NK as soon as possible before making such an application.

Documents to be attached to the Application for Company Audit

(1) Audit for issuing Interim DOC

(1-i) In case of a newly established Company

The following documents as an electronic format shall be attached to the application for audit.

- (i) Safety Management Manual (SMS Manual);
- (ii) Procedures related to SMS (including forms and checklist);
- (iii) List*³ of Ship(s) of each ship type*² covered by the SMS;
- (iv) Outline of the Company and its business activities*⁴;
- (v) SMS Implementation Plan*⁵

*¹: Ship Type shall be in accordance with **"1. Ship Type and Application of the ISM Code"**

*²: List of Ship(s) shall include "Name of Ship", "Name of Class Society", "Class No.", "Year Built", "Flag", "IMO No." and "Gross tonnage". In case of "Other Cargo Ship", "purpose" shall be added in the List.

*³: The outline of the Company is to contain a description of such items as the profile of the Company, organization, location of all offices, and number of employees (shore-based persons and seafarers) of the Company, along with a description of the types, flag state(s) and number of ships under management of the Company. Brief descriptions of the business activities of the Company may include, at a minimum, a summary of the principal cargoes and trade routes of the ships under its control and may be presented in the outline of the Company.

*⁴: A "SMS Implementation Plan" shall include following items.

- (i) Delivery date of SMS documents (ashore and ship)
- (ii) Implementation date of SMS (ashore and ship)
- (iii) Scheduled date of Internal Audit (ashore and ship)
- (iv) Scheduled date of Initial Audit by ClassNK (ashore and ship)

(1-ii) In case of Addition of Ship Type(s) to DOC issued by ClassNK

When a Company, who is in possession of DOC issued by ClassNK, applies its SMS to a new ship type(s) not listed on the existing DOC, the Company is requested to submit "the revised parts for the ship's type of SMS Manual, Procedures", "List of Ship(s)" and "SMS Implementation Plan" related to the ship type(s) in question.

(2) Initial Audit

The above documents specified in (1) Interim Audit shall be attached to the original of the Application excluding a "SMS Implementation Plan".

(3) Annual or Renewal Audit

The Company is requested to submit a list of the ships which are in possession of a SMC issued by other than ClassNK with its detail, i.e. ship's name, kind of ship, Flag, IMO number, classification society and SMC issuer, managed by the Company under the DOC issued by ClassNK, and further the revised parts of the SMS Manual, when there is any change to the SMS Manual.

(4) Additional Audit

The Company is requested to submit documents which describe the reason and detail of Additional Audit and supplemental information, as necessary.

3.4.2. Application for Shipboard Audit

The Company is requested to apply through e-Application, Web Service Portal on our website, or submit the Application for Shipboard Audit in accordance with ISM/ISPS Code (APPLI-CSA) together with documents listed below to an *Office* of ClassNK having jurisdiction over the port at which the Company plans to undergo the Audit.

Please refer to e-Application on our Home page.

An Application Form for Shipboard Audit in accordance with ISM/ISPS (APPLI-CSA) available from “Download” of the Society’s Home Page.

Any Application for Shipboard Audit for a ship classed with an IACS Society other than NK is to be assessed at Head Office at the time of first application of the ship to be managed by the Company. Therefore, the Company is kindly advised to contact NK as soon as possible before making such an application. Please be advised that an application for a ship, which is not classed with an IACS Society, is not acceptable, in principle.

Documents to be attached to the Application for Shipboard Audit

(1) Audit for issuing Interim SMC, Initial, Intermediate or Renewal Audit

- (i) A copy of a valid DOC*¹ (In the case of DOC issued by other than ClassNK. Interim DOC is valid only for Audit to issue Interim SMC)
- (ii) A copy of “Ship Inspection Certificate” in the case of Japanese flag ship
- (iii) A copy of (Provisional) Certificate of Registry in case of Audit to issue a Short-term or an Interim SMC to a ship classed with a Society other than NK.

*1: A valid DOC means to satisfy all items listed below;

- (a) Name of applicant coincides with the name of Company shown on DOC;
- (b) Administration issuing DOC coincides with the ship’s Flag;
- (c) Ship type indicated on DOC coincides with the ship;
- (d) DOC is valid in terms of period; and
- (e) DOC is endorsed for necessary Annual Audit.

(2) Additional Audit

In addition to those above, submission of documents describing the reason is requested.

3.4.3. Application to take over DOC/SMC issued by another IACS Society

When a Company requests ClassNK to hand over the validity date of DOC/SMC issued by another IACS Society (hereunder referred as the “**Losing Society**”), the Application is to be submitted to the Ship Management Systems Department (SMD) of ClassNK, attaching the documents listed below, at least one week in advance for communication between the Losing Society and NK.

In the case of Transfer of DOC

- (1) Copies of all DOC issued by Losing Society.
- (2) A copy of the last Audit Report issued by the Losing Society, including NC, if any, their status and time period(s) for implementation and verification of agreed corrective actions.
- (3) All documents specified in 3.4.1 (1).

In the case of Transfer of SMC

- (1) A copy of each of the SMC and the latest DOC issued by the Losing Society.
- (2) A copy of the last Audit Report issued by the Losing Society, including NC, if any, their status and time period(s) for implementation and verification of agreed corrective actions.
- (3) In the case of a first Application from the Company to ClassNK, a copy of the SMS Manual and List of Procedures related to the SMS.

Procedures for Transfer of DOC/SMC (for Reference)

- (1) SMD will inform the Company, in writing, of the conditions for proceeding with the Audit.
- (2) SMD shall notify the Losing Society, and request relevant information from the same.
- (3) The Audit for Transfer shall be carried out as an Additional Audit corresponding to the Annual or Intermediate Audit. However in cases where the Audit is to be carried out within the due date window of the Periodical Audit, such a Periodical Audit shall be carried out.
- (4) The new full term DOC/SMC issued by ClassNK will be valid for the same period as the previous one.

4. Company Audit

4.1. Audit for issuing Interim DOC

4.1.1. In the case of a newly established Company

An Audit for issuing Interim DOC for a newly established Company shall be conducted according to the following steps.

- (1) An interim document review shall be conducted at the Head Office of ClassNK.
An Auditor of an *Office* having jurisdiction over the area of the Company may visit the Company, and may ask some questions before conducting document review. In addition, the Auditor will confirm the contents of the “SMS Implementation Plan”.
- (2) Interim DOC shall be issued by the auditor of the *office*, upon completion of the interim audit after the document review by SMD.

In this case, the Company shall undergo Initial Audit to obtain DOC, within the validity (12 months) of the Interim DOC. In this case, further Document Review for the Manual and Procedures should be conducted prior to the Initial Audit on site. In this regard, the Application for the Initial Audit should be submitted one month before the schedule.

4.1.2. In the case of Addition of Ship Type

An Audit for issuing an Interim DOC for a Company who is in possession of DOC issued by ClassNK and applies its SMS to a new ship type(s), which is not listed on the existing DOC, shall be conducted according to the following steps.

- (1) An Auditor of an *Office* shall verify the revised parts of the SMS Manual, Procedures (cargo handling, emergency response and maintenance relevant to ship type(s) to be added) and SMS Implementation Plan for the ship type(s) in question.
- (2) An Interim DOC listing the new ship type(s) only shall be issued by the auditor of the *Office*, upon completion of above verification.

In this case, the Company shall undergo an Additional Audit to obtain a DOC, within the validity (12 months) of the Interim DOC. At the time of on-site Audit, the SMS of the Company and at least one ship of each ship type covered by the SMS should have been in operation for at least three months. Also the internal Audits for them should have been carried out.

4.2. Initial Audit of Company

Regarding the Initial Audit of a Company, an Initial document review in detail, to verify that the Company’s SMS is in conformity with the ISM Code, shall be conducted at the Head Office of ClassNK, as a first step. Upon completion of the document review, a Company Audit shall be conducted by Auditors of an Office having jurisdiction over the area of the Company.

4.2.1. Document Review

Document Review will be conducted prior to Audit for issuing interim DOC and initial Audit. An Auditor of the Head Office shall verify the descriptions in the SMS Manual and Procedures related to the SMS (including forms and checklist) submitted by the Company to ensure that

they satisfy the requirements of the ISM Code.

The results of the document review shall be described in a “Preliminary* Report of Document Review” and shall be forwarded to the Company, requesting correction of inadequate descriptions, if any.

The Auditor shall verify the response of the Company relative to the correction of documents. When he finds the response is in order, he should prepare a final “Report of Document Review” and send it to the Company and the *Office*. Please be advised that the Company Audit on site shall not be commenced, unless the document review is completed. When correction of documents could not be completed remotely, it should be completed by an interview at Head Office of ClassNK or at the Company premises with the Company’s personnel.

4.2.2. Company Initial Audit on site

- (1) At the time of on-site Audit, the SMS of the Company and at least one ship of each ship type covered by the SMS should have been in operation for at least three months. Also the internal Audits for them should have been carried out.
- (2) Auditor(s) of the *Office* shall visit the Company and shall hold meetings with the Designated Person(s), managers and/or staff of the ashore organization, according to the Audit Program submitted beforehand. The member(s) of top management are kindly requested to attend the Opening and Closing meetings.

The standard duration for Company Initial, Intermediate and Renewal Audits shall be as follows;

Company	Minimum audit duration
Small (up to 20 employees *)	1 man-days
Medium (between 21 and 50 employees)	2 man-days
Large (more than 50 employees)	2 man-days

Note: one man-day is 8 hours.

*: number of relevant employees who carry out or have responsibility to the Safety management System of the company ashore.

- (3) The following items shall be verified through the meetings and interviews.
 - (a) The SMS has been in operation satisfactorily for three months and more at the shore organization and at least one ship of each ship type covered by the SMS, verifying the controlled records and the results of internal Audits performed by the Company.
 - (b) Statutory and Class Certificate, and the statutory and survey records of at least one ship of each ship type covered by the SMS.
 - (c) Activities related to SMS have been operated in conformity with the Company SMS, as well as the requirements of conventions such as the ISM Code, SOLAS, STCW and Flag requirements, through examination of the controlled records.
 - (d) In the case of a Company, which manages ship(s) manned with multi-national crew, how the Company is checking the language skills of the crew and their communication abilities.
 - (e) Understanding and implementation of the Company’s SMS by Designated Person(s) and the Manager of each Department/Section related to the SMS shall be verified through interview.
- (4) In cases of Company Audits including Annual and Renewal Audits, the Company shall provide the statutory and classification survey records as well as ISM Audit records relevant to all ships concerned including those which are in possession of SMC issued by other organizations than ClassNK, for Auditors’ scrutiny.

4.3. Annual Audit of Company

- (1) An Annual Audit is to be carried out within three months before or after the anniversary date.
- (2) Auditor(s) shall visit the Company, and shall conduct the Audit in the same way as corresponding to paragraph 4.2.2.

The scope of the Audit is to cover all areas of the SMS, and principally is to verify if the SMS is being properly implemented or not. In addition the Auditor(s) shall verify the Company's activity relating to verification and review of any DNC and NC pointed out by the ClassNK Auditors during the previous Company and Shipboard Audits*, PSC detention, and marine casualty.

This verification shall consist of the Company's examination, analysis and resolution, including the root causes of them, and if the SMS has been improved in relation to these points, when necessary to prevent recurrence, and if these improvements have been brought to the attention of all personnel concerned.

In case a Company has sustained a number of PSC detention and/or marine casualty, the duration may be increased.

- *: In the case of a ship managed by a company who holds DOC issued by other than ClassNK, the effectiveness of corrective actions taken by the Company shall be verified at the next Shipboard Audit.

4.4. Renewal Audit of Company

- (1) Renewal Audit is to be carried out within three months before expiry date of the DOC.
- (2) The Audit shall be conducted and verified in same way corresponding to paragraph "4.3 Annual Audit of Company". In principle, the verifications shall be done for the past five years.

4.5. Additional Audit of Company

An additional Audit for a Company is to be carried out in the following cases.

- (1) When substantial modifications have been made to the SMS of the Company or major organizational changes are made within the Company.
- (2) When ClassNK or the Government of the Flag Administration considers it is necessary to request an Additional Audit in view of the nature of the NC with regards to the SMS of the Company or Ship(s).
- (3) When an Interim DOC related to addition of ship type is changed to DOC.
- (4) When a new Flag State DOC is issued in addition to the DOC in possession. (Refer to 4.7)
- (5) When the Company requests reinstatement of an invalidated DOC.
- (6) When name and/or address of a Company is changed. (Refer to 4.8)
- (7) Additional Audit for DNC" (Refer to 6.2)

Regarding the detail of procedures, please contact with an *Office* or the Head Office of ClassNK.

4.6. Handling Procedures for Revision of the SMS Manual

- (1) In cases where there is substantial change in the SMS (overall revision, organizational change, etc.), the Company is kindly requested to apply for an Additional Audit for "Revision of SMS Manual" to the *Office* having jurisdiction over the area of the Company using Form (APPLI-C), attaching one copy of the outlines of revisions, two copies of revised parts of SMS Manual and one copy of revised parts of Procedures related to SMS (including forms and checklist). Please be advised that an on-site Company Audit may be required, when ClassNK considers it is necessary depending on the results of document review at Head Office.
- (2) When a revision made to the SMS Manual is not substantial, for example change of

president, amendments of expression, revision of words or phrases and so on, the Company is kindly requested to send two copies of revised parts of SMS Manual (excluding Procedures) to the *Office* having jurisdiction over the area of the Company. After confirmation that it is not a substantial change, the revised parts shall be changed in the files retained by the *Office* and Head Office of ClassNK.

4.7. Procedures to issue DOC for a new Flag State in addition to existing DOC

- (1) When a Company commences management of a ship under a new Flag State, if the Company is not in possession of DOC issued under the authority of the new Flag State, while the Company manages that ship type, the Company should apply an Additional Audit to the *Office* having jurisdiction over the area of the Company, attaching following documents.
 - (a) A copy of (Provisional) Registry Certificate of new Flag State or evidence to show concrete plan to obtain registry of that State.
 - (b) A copy of document has been submitted to the new Flag State in compliance with the ISM Code 3.1, when the ship's registered owner is not same as the Company.
 - (c) Any evidence to show that the Company is in possession of necessary national regulations of that new State.
- (2) DOC shall be issued from the *Office* upon verification of the requirements of the new Flag State.

4.8. Handling Procedures when the Company's Name/Address changes

- (1) In cases of Companies whose DOC or Interim DOC is issued by ClassNK, the Company is requested to submit an Application to the Office of ClassNK having jurisdiction over the area of the Company. The Auditor shall conduct an Additional Audit at the Company's premises, and issue a DOC or an Interim DOC.

In this case, you are requested to hand to the Auditor a request letter (free form) for rewriting of the SMC and/or Interim SMC, attaching a list of ships, for which the rewrite is requested. SMD of ClassNK will issue SMC and/or Interim SMC, and send the same to the Company at once. (Except in those cases where ClassNK is not authorized to do so by the Flag State)
- (2) In cases of Companies whose DOC or Interim DOC is issued by the Flag Administration or an IACS Society other than ClassNK, the Company is requested to send a letter (free form) to SMD of ClassNK, clearly indicating the exact company's name/address to be shown on SMC/Interim SMC, attaching a copy of new DOC or Interim DOC and a list of ships, for which the rewrite of SMC or Interim SMC is requested.

The Head Office of ClassNK will issue the SMC and/or Interim SMC, and send the same to the Company at once. (Except in cases where ClassNK is not authorized to do so by the Flag State)

5. Shipboard Audit

5.1. Initial, Intermediate and Renewal Audit of a Ship

- (1) At the time of Initial Audit, the Company's SMS is to have been in operation on shipboard for at least three months. And also, the Internal Audit by the Company for this ship shall have been carried out.
- (2) An Auditor of the *Office* having jurisdiction over the port at which the Audit is requested shall visit the ship. The Auditor shall hold meetings with the Master, senior officers and responsible member(s)*¹ of staff appointed by the Company and make a shipboard tour, according to the Audit Program submitted beforehand. First of all, the Auditor shall confirm

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the validity of a copy of DOC placed onboard (Refer to 3.4.2 Note (1)). When a copy of valid DOC is not placed onboard, the Shipboard Audit should not be conducted.

*1: Any person ashore or onboard who is familiar with Company SMS is acceptable.

The standard duration for SMC Initial, Intermediate and Renewal Audits shall be as follows;

Ship type	Initial or Renewal Audit	Intermediate Audit
Passenger ship carrying 1500 passengers and above	2 man-days	
Passenger ship, and High-speed Craft carrying 300 passengers and above less than 1500 passengers	2 man-days	1 man-day
Offshore drilling unit	1.5 man-days	
Other type	1 man-day	

Note: one man-day is 8 hours.

- (3) The following items shall be verified through meetings, interviews and ship's tour.
 - (a) A valid latest SMS Manual and Procedures relevant to that ship are placed onboard properly.
 - (b) The validity of certificates and survey records, both Statutory and Class.
 - (c) The ship is fully manned with crew hold Certificates endorsed in accordance with STCW fulfilling the Safe Manning Certificate issued by the Flag Administration.
 - (d) Activities related to SMS have been operated in conformity with the Company SMS, as well as the requirements of conventions such as the ISM Code, SOLAS, STCW and Flag requirements, through examination of the controlled records.
 - (e) The Internal Audit of this ship has been conducted properly and its results have been brought to the attention of all personnel concerned, through examination of the controlled records.
 - (f) In cases of a ship manned with multi-national crew, how the Master is checking the language skills of the crew and their communication abilities.
 - (g) The understanding and implementation of the Company's SMS, including shipboard operation, drills and so on, by the Master and senior officers shall be verified through interview. At the shipboard tour, the Auditor shall also interview rating crew.
 - (h) In the case of a ship managed by a company who holds DOC issued by other than ClassNK, the effectiveness of corrective actions taken by the Company for DNC and NC pointed out at the previous Shipboard Audit shall be verified with the scope of 4.3(2).
- (4) In cases of Shipboard Audits, the statutory and classification survey records and ISM Audit records relevant to that ship must be available, for the Auditors' scrutiny.

5.2. Audit for issuing an Interim SMC

- (1) An Auditor of the *Office* having jurisdiction over the port at which the Audit is requested shall visit the ship and verify the following items, provided that the ship is fully manned in accordance with its Safe Manning Certificate.
 - (a) DOC, including Interim, is effective for that ship (Refer to 3.4.2 Note (1))
 - (b) The ship is provided with the manual and procedures related to that ship, which have been reviewed for the Initial Audit of Company or issuance of an Interim DOC.
 - (c) Master and relevant senior officers are familiar with SMS and the planned arrangement for its implementation.
 - (d) Instructions*¹ which are identified as essential to be provided prior to sailing have been given; including lifeboat station and responsibilities, fire station responsibilities and making available specific additional reference material associated with safety

requirements from the SOLAS training manual.

- (e) Plans for Internal Audit by the Company of the ship within three months exist.
- (f) The relevant information on the SMS is given in the working language or languages understood by the ship's personnel

*1: Essential Instructions consist of two kinds of instructions.

One is the "written instructions to the Master", which shall be prepared in accordance with the provisions of Section A-I/14 "Responsibilities of companies" of STCW 95.

Another is the "Essential Instructions to be given to newly joined crew and/or crew transferred to new assignments related to SMS", specified in 6.3 of the ISM Code, which shall be prepared for each rank of crew in accordance with the provisions of Section A-VI/1 "Mandatory minimum requirements for familiarization and basic safety training and instruction for all seafarers" of STCW 95; taking the supplemental explanations in the above (d) and the provisions of Section B-I/14 "Guidance regarding responsibilities of companies and recommended responsibilities of masters and crew members" of STCW 95 into consideration.

- (2) The validity of certificates and survey records, both Statutory and Class. The ship is fully manned with crew hold Certificates endorsed in accordance with STCW fulfilling the Safe Manning Certificate issued by the Flag Administration. Please be advised that when any Non-conformity is found no Certificate shall be issued, in the case of Audit for issuing an Interim SMC.

5.3. Additional Audit of a Ship

An Additional Audit for a Ship is to be carried out in the following cases.

- (1) When substantial modifications have been made to the Shipboard SMS. (Japanese Flag Ship only)
- (2) When ClassNK or the Flag Administration considers it is necessary to request an Additional Audit in view of the nature of the Non-conformity with regard to the SMS of the Company or Ship(s) or requested by PSCO.
- (3) When a ship's particulars such as ship's name are changed.
- (4) When the Company requests reinstatement of an invalidated SMC.
- (5) At the extension of the Interim SMC (Application must be accompanied by an Authorization letter issued by the Flag Administration)
- (6) "Additional Audit for DNC" (Refer to 6.2)

Regarding the detail of procedures, please contact with an *Office* or the Head Office of ClassNK.

5.4. Audit when the same has been suspended due to a ship's schedule

When a Shipboard Audit could not been completed due to a change of the ship's departure time etc., the Company should choose either of following two options.

- (1) The Audit shall be continued at a port where the Auditor can catch the ship or be continued in the near future at the same port when the ship should visit again.
- (2) The Audit shall be suspended and a separate application shall be forwarded to another *Office* of ClassNK. The remaining parts of the Audit shall be conducted by an Auditor of another *Office* at another port. In this case, a copy of the Audit Record made by the first Auditor shall be forward to the second Auditor, nevertheless please keep in mind the fact that a little overlapping of verification may be unavoidable.

5.5. Procedures for a Shipboard Audit when a ship's Flag is changed

When a ship's Flag has been changed without a change of the Company, an Auditor shall visit the ship and conduct Audit for issuing Interim SMC. The Auditor shall issue an Interim SMC upon

completion of verification of below items

- (a) A copy of valid DOC*¹ (Interim DOC is not acceptable) from the new Flag State is placed onboard.
- (b) A copy of document has been submitted to the new Flag State in compliance with the ISM Code 3.1, when the ship's registered owner is not same as the Company.
- (c) The necessary Statutory Certificates for the new Flag State are available onboard.
- (d) Information related to the national regulations of new Flag has been provided onboard, and the Master knows them.
- (e) The ship is manned with crew hold Certificates endorsed in accordance with STCW fulfilling the Safe Manning Certificate issued by the new Flag Administration.
- (f) Other requirements of the new Flag Administration are satisfied.

*¹: When the Company is not in possession of the valid DOC to the new Flag State, it should apply for an Additional Audit for issuance of the valid DOC to the new Flag State, in addition to the DOC in possession, to the *Office* having jurisdiction over the area of the Company beforehand.

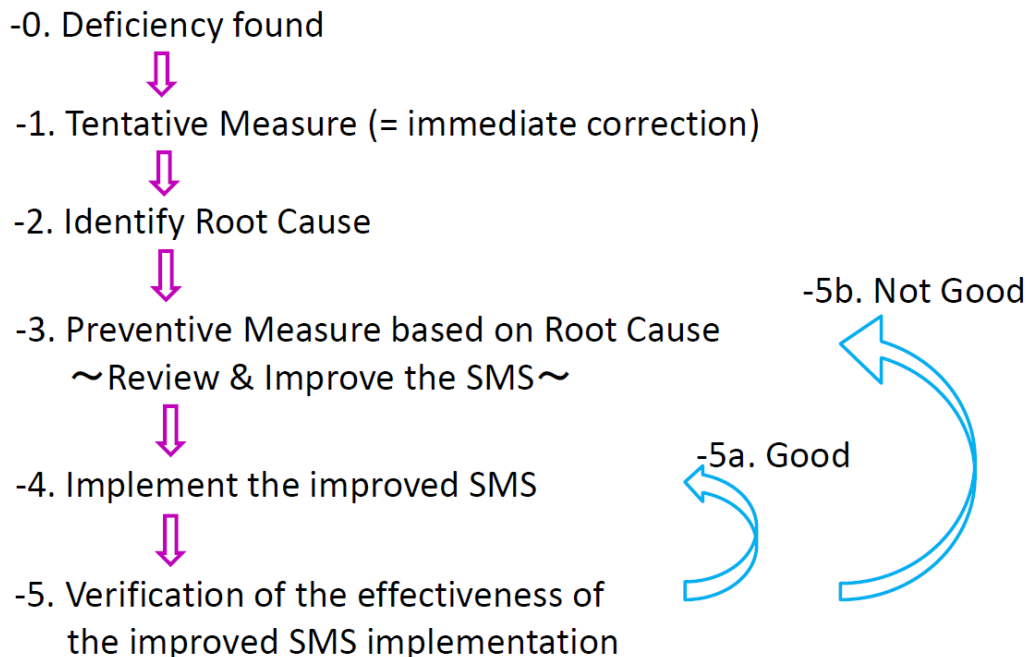
6. Pointing out of deficiency and its Corrective Action (common for Company and Shipboard Audits)

6.1. Deficiency and Corrective Action

- (1) When the objective evidence indicates the non-fulfillment of a specified requirement, Non-conformity (NC) is raised. The Auditor explains NC to the shipmaster, DPA and/or other Company's representatives, and describe NC with objective evidence on audit record.
When the identified non-fulfillment poses a serious threat to the safety of personnel or the ship or serious risk to the environment that requires immediate corrective action including the lack of effective and systematic implementation of a requirement of the ISM Code, Major Non-conformity (MNC) is raised distinctively from other NCs.
- (2) The notification of NCs identified through Audit should be taken as an opportunity to improve the SMS. The detection of NCs existed in the SMS and implementation of appropriate corrective actions will contribute to the prevention from the problems listed below as well as from the recurrence of the same type of non-conformity.
 - (a) Occurrence of casualties due to unrevealed or unresolved NCs
 - (b) Detention of ships as a result of PSC inspections.
- (3) "Corrective Action" in term of ISM Code
In principle, deficiencies pointed out as objective evidence of failure of SMS implementation shall be corrected immediately (Tentative Measure). However, the immediate correction(Tentative Measure) itself does not constitute (is not the same as) completion of "Corrective Action" in terms of the ISM Code. "Corrective Action" must include all of items 1 to 5 and the plan for the "Corrective Action" is CAP(Corrective Action Plan).
 - 1 Tentative Measure
Immediate correction of deficiencies as objective evidence.
 - 2 Root Cause Analysis
Investigation and identification of Root Cause why the deficiencies occurred under the current SMS.
 - 3 Measure to preventive recurrence (Preventive Measures)
Plan concerning preventive measures for preventing recurrence reviewing and revising the identified insufficient/defective parts of the SMS as a result of investigation in Step 2 above.
(Risk Assessment to be carried out, if necessary)

- 4 Implementation of Preventive Measures
Implementation of planned Preventive Measures.
- 5 Verification of Implementation of Preventive Measures
Determine effectiveness of preventive Measures
 - 5a: preventive measures judged as being effective
 - ⇒ continue implementation
 - 5b: effectiveness determined to be insufficient or recurrence is observed.
 - ⇒ reconsider Preventive Measure (Step 3 above) or reconsider Root Cause Analysis (Step 2 above)

Basic Flow of “Corrective Action”



6.2. Handling of a Certificate when a Non-conformity is found

6.2.1. Follow up action for MNCs

- (1) Determination of MNCs
 - (a) When an MNC is identified, the Auditor hand over Form MNC with its objective evidences to the Company's representative(or Master) as an intermediate report. The Auditor explains the MNC and follow-up procedures.
 - (b) The Company must immediately take corrective action for the deficiencies which the MNC based such as of repairs of damaged equipment. The Company is to propose the immediate corrective action to the Auditor to downgrade it to DNC. The Auditor reviews the plan and request changes as found necessary.
In order to downgrade to DNC, it is necessary to take measures to remove at least the serious threats to personnel and/or ship safety, and/or serious risks to the environment.
 - (c) After confirmation of the immediate corrective action, the Auditor describes the actions taken and DNC(s) on the Form MNC and present it to the Company's representative. The record is signed by the Auditor and the company's representative.
 - (d) In case MNC is identified, an Additional Audit to verify whether effective actions are taken (hereunder referred as "Additional Audit for DNC'') is required within 3 months from the date of the audit.

If the additional audit has not been completed within the agreed time period (max. 3 months), the DOC/SMC shall be withdrawn with reporting to the flag administration. In addition, in case a MNC which caused by the company's SMS failure is raised during shipboard audit, an Additional Company Audit may be required in addition to the additional shipboard audit, if the Auditor deems it necessary.

- (e) The Auditor prepare Form MNC as shown Appendix 1 describing the MNC and DNC (Downgraded Non-conformity) and its supporting objective evidences, and hand it to the Company's representative (or Master) at Pre-closing meeting together with a Form CAP.
- (2) DNCs follow-up
 - (a) The company is requested to draw up a corrective action plan for the DNC with a schedule not exceeding 3 months from the last date of the audit and submit Form CAP to the Auditor within 2 weeks from the last date of the audit. The Auditor reviews the proposed CAP if it is agreeable or not and ask the Company to revise it where considered necessary. In this respect, the Auditor confirms that the plan contains the root-cause investigation and the implementation of corrective actions including measures to prevent recurrence.
Where the CAP is agreed as satisfactory, the Auditor sends the receipt to the Company.
 - (b) Application for the "Additional Audit for DNC" shall be submitted to the office in cases of Company Audit, or to any Office, having jurisdiction over the port at which the Company plans to undergo the Audit, in cases of Shipboard Audit. The Application shall be accompanied by a copy of each Form MNC. The purpose of the follow-up Audit is to verify that the corrective actions taken to prevent recurrence of the findings have been implemented in line with the SMS and to confirm their effectiveness.
When the completion of effective Corrective Actions are not observed, DOC/SMC is to be invalidated.

6.2.2. Follow-up action for NCs

- (1) Determination of NCs
When NCs are identified, an Auditor prepares Form NCN as shown Appendix 2 describing the NCs and its supporting objective evidences, and hand it to the Company's representative (or Master) at Pre-closing meeting together with a Form CAP. The Auditor explains the NC and follow-up procedures.
- (2) NCs follow-up
The company is requested to draw up a corrective action plan for the DNC with a schedule not exceeding 3 months from the last date of the audit and submit Form CAP to the Auditor within 2 weeks from the last date of the audit. The Auditor reviews the proposed CAP if it is agreeable or not and ask the Company to revise it where considered necessary. In this respect, The Auditor confirms that the plan contains the root-cause investigation and the implementation of corrective actions including measures to prevent recurrence. Where the CAP is agreed as satisfactory, the Auditor will send the receipt to the Company.
The effectiveness of the corrective actions for NCs, including those raised at Shipboard Audit, shall be verified by the Auditor at the next Company Audit. However in the case of a ship managed by a Company to who holds DOC issued by other than ClassNK, the verification of the effectiveness of corrective actions shall be verified at the next Shipboard Audit.

6.3. Entry onto the Form CAP

- (1) Form CAP (Corrective Action Plan) as shown Appendix 3 is composed as follows.
As this Form can be used for DNC/NC as common form, please prepare the CAP for NC and

DNC separately, if NC and DNC exist.

- 1 Investigation of DNC/NC
Investigation of objective evidence of DNC/NC
- 2 Identification of Root Cause of DNC/NC
Identifying the Root Cause
- 3 Tentative measures for DNC/NC
Immediate correction / repair of defected installation or machinery
Tentative measure for lack of crew familiarity etc.
- 4 Preventive measures for recurrence of DNC/NC
Based on the identified Root Cause (above -2), the company examines the necessity of revising and improving the SMS, if necessary.
- 5 Verification of effectiveness of preventive measures
How to verify the planned preventive measures (above -4) are effective or not.

(2) Concrete example of CAP

- a) Investigation of DNC/NC
 - ✓ Crew were not familiar with the procedure of ~
 - ✓ Document control was insufficient/inadequate
- b) Identification of Root Cause of DNC/NC
 - ✓ There is no practical Procedure / Instruction in SMS, depending only on the crew's skill / knowledge
 - ✓ Procedure / Instruction for ~ was missing / not defined / not sufficient.
- c) Tentative measures for DNC/NC
 - ✓ Repaired defective installation / machinery
 - ✓ Provided crew education / training by the company's staff.
- d) Preventive measure for recurrence of DNC/NC
 - ✓ Procedure / Checklist will be revised
- e) Verification of effectiveness of preventive measures
 - ✓ Additional internal audit by the shore staff will be carried out by dd mm yy.
 - ✓ Verification of photos / reports from the vessel will be carried out by dd mm yy.

6.4. NCs Follow-up (In the case of Japanese ships and/or their managing Companies)

In the case of NCs raised against Japanese ships and/or their managing Companies, the Auditor shall hand over Form CAP-J instead of, or in addition to, Form CAP to the DPA or the Master. Form CAP-J shall be sent by e-mail to the Auditor in charge within two weeks after entering the Corrective Action Plan into the upper part. The same shall be submitted to the Auditor in charge within 3 months after completing it, namely entering the corrective actions taken onto lower part of the Form, as an Application for Follow-up Audit.

At the first submission of Form CAP-J by e-mail, the *Office* shall forward a "Receipt" to the Company.

At the second submission of Form CAP-J, the *Office* shall receive the same as Application for "Follow-up Audit", and an Audit Record for Follow-up shall be forwarded to the Company.

7. Actions for ISM Deficiencies Raised in PSC Inspections

When deficiencies related to ISM Code requirements (ISM deficiencies) are raised in PSC inspections, the procedures specified below are supposed to be followed, while it should be confirmed with the PSC Officer (PSCO) on individual case basis.

7.1. ISM Deficiencies which are Ground for Detention

In the case of MNCs or deficiencies which are ground for the detention of ship, external Audit by the flag administration or a recognized organization is normally required by the PSCO.

Procedures

- (1) The Company should submit an application for additional Audit to the local ClassNK office together with:
 - (a) a copy of the PSC inspection report
 - (b) particular explanation by the PSCO on why the ISM deficiencies were raised and Company's views in any
- (2) The Company should arrange correction of the physical or operational deficiencies on which the ISM deficiencies are based, e.g. repairs of hull construction and equipment, provision of necessary document.
- (3) The auditor categorizes the deficiencies pointed out by PSCO into the element of ISM Code and decides the scope of the audit. The auditor determines MNC, NC or OBS based on the corrected object evidences during the audit, including the deficiencies and issues an Audit records.
- (4) The Company should make report on the actions taken to the PSCO with a copy of the Audit records for release of the ship.

Procedures after the detention is lifted

- (5) The Company should investigate the root causes of ISM deficiencies and formulate a corrective action plan (Form CAP) to prevent recurrence. The plan should be submitted to the auditor in charge without delay. (Please see 6.2.1(2)(a), 6.2.2(2), 6.3 above)
- (6) In case where DNC is raised, the Company is required to undergo an additional audit for follow-up of DNC (Additional Audit for DNC) within the agreed time period, not exceeding three months from the completion date of the additional audit at the detention. (Please see 6.2.1(1)(d) above) If NC is raised, the Company may undergo an additional audit for follow-up of NC as necessary. During the additional audit for follow-up of DNC/NC, an auditor will verify the effectiveness of corrective actions implemented under the agreed corrective action plan as well as the deficiencies already rectified and not recurrent. Therefore, additional audits for follow-up of DNC/NC should be conducted after the corrective action has been implemented for a certain period. It is recommended to allow at least two months for DNC, and three months for NC.

7.2. Other cases

When an Audit by the Flag Administration or a recognized organization is required by the PSCO for other ISM deficiencies than MNCs and those which are ground for detention of ship, the procedures stated in (1) thorough (5) of 7.1 should be followed, in principle.

Appendix 1 Form MNC (sample)

ClassNK

Form MNC

NIPPON KAIJI KYOKAI

Major Non-conformity Note for SMS

Record No.

Company's Name: ABC Shipping Co., Ltd.

C.ID.: 0123

Sheet No.

19SQM0123

Ship's Name: ABC ACE

1/1

Major Non-conformity

SMS Manual Ref. No.: Chapter 10.5 ISM Code Ref. No. 10.2

(Indicate Objective Evidence(s) to substantiate the Major Non-conformity.)

The ship is not maintained in conformity with the provisions of relevant rules and regulations.

(Objective Evidences)

1. Starboard side shell plate of Lifeboat (p-side) was holed at middle depth around half-length.
2. The brake pads of the Boat Davit Winches were heavily wasted, and the crew had overlooked this waste
3. The damage listed above had not been reported to the company by the Master.

This Major Non-conformity was downgraded by following countermeasure(s).

1. The fact of the holed shell plate of Lifeboat was reported to the Administration by the Company.
2. An additional Life raft (20 persons) was provided on board according to the Administration's Instructions.
3. The brake pads of the Boat Davit Winches were replaced with new ones by ship's hands.
4. Repair of the damaged Lifeboat has been arranged at the next port by the Company.

Downgraded Non-conformity (DNC)

1. Inspections have not been held at appropriate intervals as per the SMS. (Code 10.2.1)
2. The maintenance related deficiencies have not been reported to the company, with possible cause, if known, as per the SMS (Code 10.2.2)

Corrective Action Plan

1. An Additional Audit shall be conducted to verify effective actions are taken in accordance with the Corrective Action Plan for DNC by DD MM 2019.
2. The Society shall proceed to INVALIDATE the relevant DOC/SMC, unless the Downgraded Non-conformity (DNC) above is resolved and verified at the Additional Audit within three months.
3. This report will be submitted to Flag State and to DOC Issuer according to IACS Procedural Requirements No.9.

Corrective Action Plan for the DNC shall be prepared by DPA using Form CAP, and be submitted to the auditor in charge within two (2) weeks from Designated Person ashore.

Corrective actions shall be scheduled to be completed within three (3) months.

(Mr. Kaiji)
Auditor to NK

(Captain ABC)
~~Designated Person~~* / Master*

*Delete as appropriate.

Form MNC (2018.08)

Handbook for ISM Audits (18th Edition)

Appendix 2 Form NCN (sample)

Record No.			Non-conformity Note for SMS	Sheet No.
19	SQM	0123		1/1

No.	Non-conformities (Indicate Objective Evidence(s) to substantiate the Non-conformity, just below the statement.)	ISM Code Ref. No.
1.	<i>Ship's Master has not implemented the Company's policy properly.</i> (Objective Evidences) 1. <i>Briefing on the SMS to all ratings by the Master has not been carried out in the last month as required by the Company's SMS.</i>	5.1.1
2.	<i>Ship's Master has neither reviewed properly the SMS nor reported its deficiencies to the Company as required by the SMS.</i> (Objective Evidences) 1. <i>The SMS requires that Master should review the SMS and report its deficiencies to the Company once per three months.</i> 2. <i>There is no evidence the Master's review report has been sent to the Company, although 5 months has passed since the Master came onboard the ship.</i>	5.1.5
3.	<i>Some shipboard operations have not been carried out properly as required by the Company's SMS.</i> (Objective Evidences) 1. <i>Ship's departure operations at the last port were not carried out as per the Procedures.</i> 2. <i>Passage plan for the last voyage was not prepared.</i>	7
4.	<i>Emergency drills and exercises have not been carried out properly as required by the programmes specified by the Company.</i> (Objective Evidences) 1. <i>Able seaman B said that he did not participate in fire drills for the past two months.</i> 2. <i>Oiler C is not aware his duties in an engine room fire.</i>	8.2
5.	<i>Inspections have not been held at appropriate intervals as required by the SMS properly.</i> (Objective Evidences) 1. <i>Fuel oil soaked the ragging around FO purifier at the time of audit.</i> 2. <i>Weekly inspections for life saving appliances and firefighting equipment have not been held as required by the SMS.</i>	10.2.1

A corrective action plan, including a schedule not exceeding three months, for implementation of the necessary corrective actions shall be submitted to the Auditor within two weeks.

The effectiveness of corrective actions for Non-conformities above should be verified at the next Company Audit, including those raised at Shipboard Audits. But, in the case of a ship managed by a Company, whose DOC has not been issued by the Society, the effectiveness of corrective actions should be verified at the next Shipboard Audit.

Form NCN

Appendix 3 Form CAP (sample)

To: <u>ClassNK Kaiji Office</u> (Fax. No. +12-3456789) Attn: <u>Mr. Kaiji</u> (Auditor)		Record No. 19SQM0123
Company's Name: ABC Shipping Co., Ltd.		ID No. 0123
Ship's Name: ABC ACE	Master's Name: Capt. ABC	

Corrective Action Plan for NC* ~~/DNC*~~

Date: 1st Feb. 2019
Designated Person: _____
 (Signed)
 (Capt. ABC)

I hereby submit corrective action plan for the Non-conformity(ies) or the downgraded Non-conformity(ies), specified by the above Record No., to implement the necessary corrective actions within three months, as follows;

<i>Please itemize actions to be taken together with scheduled date of each action.</i>
<u>Investigations for NC or DNC:</u> ▪ Insufficient awareness of the Master and senior Officers of the SMS. ▪ Insufficient inspections of the pipe lines by crew members.
<u>Identification of Root Cause of NC or DNC:</u> ▪ Unclear procedure for training of Crew needing refresher/additional education. ▪ Interval of inspection of pipe line was too long to identify the deficiency.
<u>Tentative measure for NC or DNC:</u> ▪ Re-education of the ship's personnel by shore staff was done on dd mm yy. ▪ Repair of the F.O. soaked ragging by ship's hand at once. ▪ An internal Information Circular shall be issued to all ships under management of the company by 1 March 2019.
<u>Preventive measure for recurrence of NC or DNC:</u> ▪ Procedure / Checklist will be revised.
<u>Verification of effectiveness preventive measure:</u> ▪ An extraordinary Internal Audit shall be conducted by 20 April 2019.
Example of Actions (for reference only): * Revision of SMS Manual and/or Procedures. * Internal Circular. * Reeducation of Personnel concerned. * Internal Audit. * Recurrence prevention * System Review Meeting

This sheet(s) shall be submitted to the Auditor by 15 Feb. 2019. (within two(2) weeks)

In cases of Shipboard Audit, this sheet shall be submitted to the Auditor via Designated Person.

An Additional Audit for DNC shall be conducted to verify effective actions are taken by the Company and/or Master within three (3) months.

Form CAP

For certification

Handbook on Inspection of Seafarers’ Working and Living Conditions

**Based on the MLC, 2006
(Maritime Labour Convention, 2006)**

**NIPPON KAIJI KYOKAI
Ship Management Systems Department**

2022-02 (3rd Revision)

Record of Revision

Date	Revised Paragraph	Reason of revision
November 2014	7.2.1	Minimum operation period on board for measures and plans set out in the reviewed DMLC Part II (in principle 1 month to in principle 3 months)
November 2014	7.2.4	Newly addition
September 2017	introduction	Revision, Added 2014 amendments to MLC, 2006
September 2017	6.-3	Newly addition: Short –term MLC
September 2017	7.2.1	Revision, Minimum operation period on board for measures and plans set out in the reviewed DMLC Part II was changed from 3 months to 1 month and transferred to section 8.1.1
September 2017	7.2.3	Deletion
September 2017	7.2.4	Deletion
September 2017	8.	Newly addition
September 2017	Department name change	Ship Management Systems Department
February 2022	1. & 7.1.3 & 7.2.1 & 10.	Revised description due to introduction of electronic audit records.

About your nearest branch or office in charge

Please refer to “DIRECTORY” issued every half year by Class NK.
The latest version of” DIRECTORY” is available from our Website.
http://www.classnk.or.jp/hp/en/directory/dir_top.aspx

Please contact Ship Management Systems Department (SMD) for inquiries about Handbook on Inspection of seafarers' Working and Living Conditions.

Class NK, NIPPON KAIJI KYOKAI, Ship Management Systems Department

Tel: 03-5226-2173 /Fax: 03-5226-2174

e-mail : smd@classnk.or.jp

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1. Introduction

Maritime Labour Convention, 2006 was established by consolidating and updating of 68 Maritime Conventions and Recommendations that International Labour Organization (ILO) has adopted since 1920. And minimum requirements on working and living conditions for seafarers who work on board a ship are provided in this Convention, namely the provisions on conditions of employment, hours of work and hours of rest, accommodation and recreational facilities, food and catering, health protection, medical care, welfare and social security protection are included in this Convention.

This Convention has been enforced on 20 August 2013.

This Convention is designed to become a global instrument known as the "fourth pillar" of the international regulatory regime for quality shipping, complementing the key Conventions of the International Maritime Organization (IMO), i.e., SOLAS, STCW and MARPOL.

Accordingly, by coming into force of this Convention, Ships, registered in the ratified country of this convention as flag state, which are 500 gross tonnages or over, engaged in international voyage are requested to take an inspection by a flag state or a Recognized Organization (RO) recognized by the flag state to verify compliance with the requirements of the flag state's national laws and regulations implementing MLC, 2006 and to issue Maritime Labour Certificate (hereafter, MLC). And the MLC and Declaration of Maritime Labour Compliance (hereafter, DMLC) which is attached to MLC shall be kept on board the ship.

ClassNK has been authorized by many flag states as RO. ClassNK has been conducting review of Declaration of Maritime Labour Compliance Part II (DMLC Part II) and shipboard inspections and has been issuing Maritime Labour Certificate (MLC) on behalf of flag states except a few of them.

In addition, ClassNK has been promoting the digitization of our services as follows.

- .1 Application forms are posted on our Homepage and it is available to apply for MLC shipboard inspections by using online application service (e-Application). For details, please refer to our Home Page.
- .2 It's available for issuing secured MLC by e-certificate (PDF), instead of conventional paper one. For details, please refer to our Home Page.
- .3 Starting from 30 January 2022, the reports after completion of MLC shipboard inspection would be issued electronically and sent to the management company.
- .4 All our services above including this handbook are available from our Home Page, refer as below.

Checklist: <https://www.classnk.or.jp/hp/en/activities/statutory/mlc/index.html>

Application form: https://www.classnk.or.jp/hp/en/download/dl_appli.aspx

e-Application: <https://www.classnk.or.jp/hp/en/activities/portal/e-appli.html>

2. Abbreviations of terms

MLC, 2006: Maritime Labour Convention, 2006

MLC: Maritime Labour Certificate (for ships flying flag of ratified country)

IMLC: Interim Maritime Labour Certificate (for ships flying flag of ratified country)

SOC: Statement of Compliance (for ships flying flag of non-ratified country or Non-enforced country)

DMLC: Declaration of Maritime Labour Compliance - composed of Part I & Part II

- Part I: List of national legal provisions for implementing requirements of the Convention – drawn up by the competent authority of flag state
- Part II: the measures and plans adopted to ensure ongoing compliance with national requirement as prescribed in Part I – drawn up by the Shipowner and reviewed and certified by the flag administration or RO recognized by the flag state.

RO: Recognized Organization

3. Definitions of Terms

- “*Seafarer*” means any person who is employed or engaged or works in any capacity on board a ship to which this Convention applies;
- “*Seafarers’ employment agreement*” includes both a contract of employment and articles of agreement;
- “*Seafarer recruitment and placement service*” means any person, Shipowner, institution, agency or other organization, in the public or the private sector, which is engaged in recruiting seafarers on behalf of Shipowners or placing seafarers with Shipowners;
- “*Ship*” means a ship other than one which navigates exclusively in inland waters or waters within, or closely adjacent to, sheltered waters or areas where port regulations apply;
- “*Shipowner*” means the owner of the ship or another organization or person, such as the manager, agent or bareboat charterer, who has assumed the responsibility for the operation of the ship from the owner and who, on assuming such responsibility, has agreed to take over the duties and responsibilities imposed on Shipowners in accordance with this Convention, regardless of whether any other organization or persons fulfill certain of the duties or responsibilities on behalf of the Shipowner.

4. Explanatory Note to the regulations and code of the MLC, 2006

- (1) This explanatory note, which does not form part of the Maritime Labour Convention, is intended as a general guide to the Convention.
- (2) The Convention comprises three different but related parts: the Articles, the Regulations and the Code.
- (3) The Articles and Regulations set out the core rights and principles and the basic obligations of Members ratifying the Convention. The Articles and Regulations can only be changed by the Conference in the framework of article 19 of the Constitution of the International Labour Organization (see Article XIV of the Convention).
- (4) The Code contains the details for the implementation of the Regulations. It comprises Part A (mandatory Standards) and Part B (non-mandatory Guidelines). The Code can be amended through the simplified procedure set out in Article XV of the Convention. Since the Code relates to detailed implementation, amendments to it must remain within the general scope of the Articles and Regulations.
- (5) The Regulations and the Code are organized into general areas under five Titles:
 - Title 1: Minimum requirements for seafarers to work on a ship*
 - Title 2: Conditions of employment*
 - Title 3: Accommodation, recreational facilities, food and catering*
 - Title 4: Health protection, medical care, welfare and social security protection*
 - Title 5: Compliance and enforcement*
- (6) Each Title contains groups of provisions relating to a particular right or principle (or enforcement measure in Title 5), with connected numbering. The first group in Title 1, for example, consists of Regulation 1.1, Standard A1.1 and Guideline B1.1, relating to minimum age.
- (7) The Convention has three underlying purposes:
 - (a) to lay down, in its Articles and Regulations, a firm set of rights and principles;
 - (b) to allow, through the Code, a considerable degree of flexibility in the way Members implement those rights and principles; and
 - (c) to ensure, through Title 5, that the rights and principles are properly complied with and enforced.
- (8) There are two main areas for flexibility in implementation: one is the possibility for a Member, where necessary (see Article VI, paragraph 3), to give effect to the detailed requirements of Part A of the Code through substantial equivalence (as defined in Article VI, paragraph 4).
- (9) The second area of flexibility in implementation is provided by formulating the mandatory requirements of many provisions in Part A in a more general way, thus leaving a wider scope for discretion as to the precise action to be provided for at the national level. In such cases, guidance on implementation is given in the non-mandatory Part B of the Code. In this way, Members which have ratified this Convention can ascertain the kind of action that might be

expected of them under the corresponding general obligation in Part A, as well as action that would not necessarily be required. For example, Standard A4.1 requires all ships to provide prompt access to the necessary medicines for medical care on board ship (paragraph 1(b)) and to "carry a medicine chest" (paragraph 4(a)). The fulfillment in good faith of this latter obligation clearly means something more than simply having a medicine chest on board each ship. A more precise indication of what is involved is provided in the corresponding Guideline B4.1.1 (paragraph 4) so as to ensure that the contents of the chest are properly stored, used and maintained.

- (10) Members which have ratified this Convention are not bound by the guidance concerned and, as indicated in the provisions in Title 5 on port State control, inspections would deal only with the relevant requirements of this Convention (Articles, Regulations and the Standards in Part A). However, Members are required under paragraph 2 of Article VI to give due consideration to implementing their responsibilities under Part A of the Code in the manner provided for in Part B. If, having duly considered the relevant Guidelines, a Member decides to provide for different arrangements which ensure the proper storage, use and maintenance of the contents of the medicine chest, to take the example given above, as required by the Standard in Part A, then that is acceptable. On the other hand, by following the guidance provided in Part B, the Member concerned, as well as the ILO bodies responsible for reviewing implementation of international labour Conventions, can be sure without further consideration that the arrangements the Member has provided for are adequate to implement the responsibilities under Part A to which the Guideline relates.

5. Applicable Ship

Ships which are required to comply with MLC, 2006 and to hold Maritime Labour Certificate (MLC) and Declaration of Maritime Labour Compliance (DMLC) are as follows:

- .1 500 gross tonnage or over, engaged in international voyages; and
- .2 500 gross tonnage or over, flying the flag of a Member and operating from a port, or between ports, in another country.

6. Type of Certificate, Supplementary documents and Validity

The certificate is only Maritime Labour Certificate (hereunder referred to as MLC) which is issued to a ship. There is no certificate issued to the Shipowner. The types of MLC are as follows.

1. MLC: Full term certificate issued under the authority of the flag state. (it is issued upon the completion of initial / renewal shipboard inspection.) It is provided that its validity shall not exceed five (5) years.
2. IMLC Interim certificate issued under the authority of the flag state. It is provided that its validity shall not exceed six (6) months. This certificate is to be issued to following cases,
 - ① to new ships on delivery;

- ② when ship changes flag; or
- ③ when a Shipowner assumes responsibility for the operation of a ship which is new to that Shipowner.
- 3. Short-term MLC
 - Certificate complementing the period until issuance of full-term MLC, in case that CAP treatment has been taken when unresolved deficiency was remained at the completion of a shipboard inspection.
 - In case that a flag concerned issue full-term MLC, this Short-term MLC may be issued according to the flag's instruction accordingly.
- 4. DMLC: These declarations are composed of Part I and Part II, and attached to and Complemented MLC.
 - Part I is to be drawn up and issued by the flag administration to individual ship.
 - Part II is to be drawn up by the Shipowner and certified by the flag administration or Recognized Organization.
- 5. SOC: It is a Certificate to certify a ship complies with national requirements of a flag state implementing MLC, 2006 prior to coming into force of the Convention in the State officially or a ship complies with national requirements of non-ratified state. upon the inspection and certification carried out based on this hand book. The SOC is to be issued instead of MLC according to the instruction by the flag state. The validity and maintenance of SOC is to be followed to provisions by the flag state. Likewise above -2, ISOC is to be issued accordingly, if applicable. Short-term SOC will be issued as mentioned above 3. in case that CAP treatment has been taken when unresolved deficiency was remained at the completion of an initial shipboard inspection.

7. Inspection and Certification

Inspection and certification of compliance are required on the Convention, and consists of **Document review and On-board inspection. Initial on-board inspection is to be carried out after completion of Document review.**

7.1 Document review

7.1.1 Application for Document review

The application of Document review should be submitted to our branch or office in charge.

Only ships which are registered to the flag state recognized NK as their RO delegating to conduct document reviews are acceptable.

7.1.2 Documents to be submitted

Documents to be submitted are as follows.

1. Application form (Form MLC-APPLI-R)
2. Documents which are required to submit mentioned in the above application.

7.1.3 Document review

It is reviewed that measures/plans to make sure ongoing compliance with the requirements provided in DMLC Part I issued by the flag administration are incorporated in the DMLC Part II.

When the non-compliance is found as a result of review, since the non-compliance is notified to Shipowner in writing then suitable corrections on the DMLC part II are required and re-submission of the revised one is also required.

Regarding the reviewed DMLC Part II, Form MLC-LOR (Letter of Review of Relevant Documents (DMLC Part II and/or drawings)) will be issued as the document which indicates successful result of the Document review and will be returned to Shipowner on electric format by e-mail. Please keep the original DMLC Part I, the reviewed Part II (original or scanned copy) and Form MLC-LOR on board. On the following on-board inspection it is confirmed that those measures and plans set out in the reviewed DMLC Part II have been implemented on board a ship sufficiently.

In the case of the on-board inspection for issuing an interim MLC, it is not always required the completion of the document review mentioned above prior to the said inspection.

7.2 On-board inspection

7.2.1 Application for On-board inspection

The application of On-board inspection should be submitted to the nearest Branch or overseas office of the Society, where an inspection will take place directly. Please pay attention that, as a rule, a ship is not in normal operation, such as in dry-dock or at lay-up condition, the society may not undergo an on-board inspection except for an inspection for issuing Interim MLC.

7.2.2 Documents to be submitted

Documents to be submitted are as follows.

1. Application form (Form MLC-APPLI-S)
2. Documents which are required to submit mentioned in the above application.

8. Kind of inspection and timing of execution

8.1 Initial inspection

Inspection for issuing Full-term MLC (SOC). On-board inspection followed by document review is required and **an operation of the measures/plans set out in the DMLC Part II on a ship for at least 1 month is also required, in principle.**

In addition, it is required that the review of DMLC Part II has been completed

8.2 Intermediate inspection

Inspection to be conducted between the 2nd and 3rd anniversary date. After completion of the inspection, endorsement to the current MLC is to be made.

8.3 Renewal inspection

Inspection to renew the existing MLC before it expires. If the inspection is completed within 3 month before its expiry date, the anniversary date on the existing MLC remains unchanged. MLC is issued newly.

8.4 Inspection for issuing interim MLC

In any of the following cases, interim MLC may be issued.

*It is not always required to complete the review of DMLC Part II prior to the inspection but required that the application for review of DMLC Part II has been submitted to and accepted by RO or Flag.

1. New ships on delivery;
2. When a ship changes flag; or
3. When a Shipowner assumes responsibility for the operation of a ship which is new to that Shipowner.

8.5 Additional inspection

Shipboard inspection specified by NK except periodical inspection (Initial inspection, Intermediate inspection and Renewal inspection) and Inspection for issuing interim MLC.

In any of the following cases, this inspection is required.

1. Change of ship's specification (ship's name, tonnage)

Completion of the review of amended DMLC Part II is required prior to conducting the inspection.

New MLC with same expiry date as the current one will be issued and the amended DMLC Part II will be endorsed accordingly.

2. Substantial amendment of the current DMLC Part II

Completion of the review of amended DMLC Part II is required prior to conducting the inspection.

The amended DMLC Part II will be endorsed and new MLC with the same expiry date as the current MLC will be issued accordingly.

3. When a ship that has been out of service for more than 3 months is re-entered service.

The handling will be confirmed by the Flag Administration and the inspection may be carried out in accordance with the flag's instruction.

4. Change of specification stated in MLC and DMLC Part II (change of name or address of MLC shipowner, etc.)

Completion of the review of amended DMLC Part II is required prior to conducting the inspection.

The confirmation is to be carried out at SMD by review of the relevant documents without shipboard inspection. The application and the amended DMLC Part II are to be sent to SMD.

New MLC will be issued and the amended DMLC Part II will be endorsed accordingly.

5. When major non-conformity found during inspection was down-graded but could not be rectified by completion of the inspection.

This inspection is required within the agreed period (maximum 3 months) for verification of implementation effectively of the agreed corrective action plan.

The current MLC will be endorsed after completion of the inspection.

6. When additional inspection is required due to non-conformity pointed out by PSC inspection.

The current MLC will be endorsed after completion of the inspection.

7. Transfer of MLC Certification (in case of taking over from other IACS member)

New MLC with the same expiry date as the current one will be issued unless otherwise provided or requested especially by the Flag state concerned or MLC shipowner.

8. Modification of crew accommodation.

Verification is to be carried out according to the instruction of the Flag administration.

9. Any additional inspection as determined by flag administration.

Verification is to be carried out according to the instruction of the Flag administration.

9. Issuance and maintenance of SOC, various inspections and issuance of certificate

Issuance and maintenance of SOC is principally treated as same as MLC, but if there are special requirements by flag state those requirements should be followed.

The type of inspection and certificate may be different depending on various condition of the ship or the timing of inspection. So, please contact to SMD for further detail.

Handbook for Ship Security System Audit (For Non-Japanese Ships)

**Based on the ISPS Code
(International Ship and Port Facility Security Code)**

ClassNK

**NIPPON KAIJI KYOKAI
Ship Management Systems Department**

February 2022 (Ver. 19)

Records of Revision

Date	Edition	Major points of Revision
July 2003	Established	—
Sept. 2017	17 th	-Revised “Introduction”. -Added “e-Application” service. -Revised the required documents at the SSP approvals or notices
Oct. 2021	18 th	-Revised the handling for SSP approval due to introduction of SSP Audit document management system.
Feb. 2022	19 th	-Revised description due to introduction of electronic audit records.

The Society’s Home Page (www.classnk.or.jp) →

Regarding the jurisdiction of each Branch or Office of the Society

Please refer to the “DIRECTORY” which is published by the Society.
Note: an updated version of the same is available on the Society’s web site.

For any questions about this “Handbook” please do not hesitate to contact the Ship Management Systems Department of the Society (ClassNK) Head Office.

Tel: +81-3-5226-2173 / Fax: +81-3-5226-2174
e-mail: smd@classnk.or.jp

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1. Introduction

According to SOLAS XI-2 and ISPS code, all passenger ships, cargo ships of 500 GT and above, and mobile offshore drilling unit engaged in international voyages must be carried out the ship security assessment, established the ship security plan and must possess an International Ship Security Certificate (ISSC) after initial audit confirming the practice of the plan on-board.

ClassNK has been authorized by many flag administrations as Recognized Security Organization (RSO), therefore, we've been conducting SSP approvals, shipboard audits and issuing ISSC on behalf of the administrations, exclude a few ex. Panama.

As stipulated in ISPS code A/9.4.11, a ship security plan (SSP) is required to review periodically. Please refer to item 7.1.2 for approval of SSP amendment.

The text of SOLAS convention (excerpt) and ISPS code are available on ClassNK Home page.

In addition, ClassNK have been promoting our services to digitization as follows.

- .1 We have posted the self-checklists for SSP approval and shipboard audit. And it's available to apply online the SSP approval and shipboard audit using "e-Application".
- .2 It's available for issuing secured ISSC by e-certificate (PDF), instead of paper one. Please refer to our Home Page.
- .3 Starting from Oct. 2021, we have been approving the SSP by electronical measure. We recommend our customers to use "e-Application" services for SSP approval both initial and amendment.
- .4 Starting from 30 January 2022, the reports after completion of ISPS audit would be issued electronically and send to the management company.
- .5 All our services above including this handbook are available from our Home Page, refer as below.

Checklist: Ship Security Management Systems (ISPS) | ClassNK - English

Application form: Application Forms | ClassNK - English

e-Application: [http: e-Application](http://e-Application) | ClassNK - English

2. Abbreviations of terms

ISPS Code: International Ship and Port Facility Security Code

(Formal name: The International Code for the Security of Ships and of Port Facility)

ISSC: International Ship Security Certificate

SSP: Ship Security Plan

SSA: Ship Security Assessment

CSO: Company Security Officer

SSO: Ship Security Officer

RSO: Recognized Security Organization

DOC: Document of Compliance

SMC: Safety Management Certificate

SSAS: Ship Security Alert System

3. Definitions of Terms used in the Regulation and Code

3.1 Definitions of Terms in SOLASXI-2

“*Company*” means a Company as defined in regulation IX/1.

“*Recognized Security Organization (RSO)*” means an organization with appropriate expertise in security matters and with appropriate knowledge of ship and port operations authorized to carry out an assessment, or a certification activity, required by this chapter or by part A of the ISPS Code.

3.2 Definitions of Terms in the ISPS Code

“*Ship Security Plan (SSP)*” means a plan developed to ensure the application of measures designed to protect the persons on board, cargo, cargo transport units, ship’s stores or the ship from the risks of a security incident.

“*Ship Security Officer (SSO)*” means the person on board the ship, accountable to the master, designated by the Company as responsible for the security of the ship, including implementation and maintenance of the ship security plan and for liaison with the Company security officer and port facility security officers. It was agreed at IMO that nothing would prevent the master from being appointed as an SSO.

Since 1 July 2009, it is required a “Certificate of proficiency” for SSO issued by the Administration in accordance with STCW Reg. VI/5.

“*Company Security Officer (CSO)*” means the person designated by the Company for ensuring that a ship security assessment is carried out; that a ship security plan is developed, submitted for approval, and thereafter implemented and maintained and for liaison with port facility security officers and ship security officer.

4. Applicable Ship Types

As a rule, the requirements apply to the following types of ships engaged on international voyages

- .1 passenger ships, including high-speed passenger craft;
- .2 cargo ships, including high-speed craft, of 500 gross tonnage and upwards; and
- .3 mobile offshore drilling units.

Please be advised that for Japanese ships, ClassNK prepared a separate Rule and Handbook.

5. Certificates

5.1 Types of Certificates and Validity

The types of ISSCs are as follows.

- .1 ISSC: Full term certificate issued under the authority of the Flag State.
- .2 Short Term ISSC: A certificate issued to cover the period until a full-term ISSC is issued. As a rule, it is issued after Initial, Renewal or Additional Audit.
- .3 Interim ISSC: A certificate that may be issued to a ship which has newly joined under management of a Company, or which has changed her Flag.

5.1.1 ISSC

An ISSC is issued to a ship which holds a Ship Security Plan (SSP) approved by the Flag State or by the Society or other Recognized Security Organization (RSO) on behalf of the Flag State, upon successful completion of an Initial Audit.

The validity of ISSC issued after the Initial Audit shall be five years from the last date of the Audit subject to execution of an Intermediate Audit. The validity

of an ISSC issued after the Renewal Audit shall be five years from the next day after the expiry date of existing ISSC when the Renewal Audit is completed within three months before the expiry date of existing ISSC; but when the Renewal Audit is completed more than three months before the expiry date of old ISSC, the new ISSC shall be valid from the date of completion of Renewal Audit for a period of five years.

The ISSC shall be endorsed upon successful completion of an Intermediate Audit, or of an Additional Audit where the flag Administration authorized to do so.

The ISSC shall be kept on board the ship and a copy of the ISSC shall be kept by the Company.

The expiry date of the ISSC may be harmonized to the expiry date on Safety Management Certificate (SMC) of the ship at the request of the Company.

Some flag Administrations, e.g., Panama, Belgium, Curacao, St Vincent & Grenadines, etc., have not granted authorization for the issuance of ISSC. Therefore, if the ship is registered in such flag, please approach flag Administration for the issuance of ISSCs. Moreover, the flag Administration of Belgium and Curacao have not granted the authorization to issue a short term ISSC to ClassNK.

With regard to Commonwealth of Dominica, while the Society is authorized to carry out initial audits and to issue a short term ISSC (full term ISSC is issued by the Administration), the Society is not authorized to carry out an audit for the issuance of an Interim ISSC. Therefore, please apply for the audit to the flag Administration. With regard to Japanese ships, as it is indicated in the Rule and the Handbook applicable to the Japanese ships, ClassNK is not authorized to issue any form of certificate, while ClassNK is authorized to carry out audits. Please contact the Japanese Government for the issuance of certificates.

5.1.2 Short term ISSC

A Short term ISSC valid for five months shall be issued to a ship under the authority of Flag State upon completion of an Audit by the Auditor to prove satisfactory completion of an Initial or Renewal Audit.

A Short term ISSC shall be issued at an Additional Audit which existing ISSC are re-written.

With regard to ships flagged with Panama, the flag does not authorize the issuance of a short term ISSC upon completion of the Initial Audit. Therefore, the company is requested to apply to the flag for issuing the full term ISSC during the validity of Interim ISSC.

5.1.3 Interim ISSC

An Interim ISSC valid for six months shall be issued to a ship subject to the following conditions.

Where it is not possible to verify compliance with the SSP due to not enough implementation period, an Audit for Issuing Interim ISSC will be conducted even when a SSP is approved

- .1 when a ship does not hold ISSC, at delivery of the ship:
- .2 when a Company newly commences management of the ship:
- .3 when a ship's Flag is transferred (in case of not approval of SSP or according to flag requirement).

5.2 Extension, Invalidation, Re-issuance, Revision and Returning of Certificates

5.2.1 Extension of Validity of a Certificate

When a ship is underway to an intended port to undergo a Renewal Audit at the time of due date of the certificate, ISSC may be extended by not more than three months upon receipt authorization for extension issued by the Administration. However, when a ship arrives at the intended port, it shall not be permitted to leave the port without a renewal certificate or the current certificate with endorsement for extension based on the completion of renewal audit.

5.2.2 Invalidation of a Certificate

An existing certificate shall become invalid when:

- .1 a ship has not undergone the periodical Audit (Renewal, Intermediate):
- .2 remedial actions for non-compliance set out at the Audit have not been completed within the agreed period of time:
- .3 a part of the SSP which requires approval upon amendment has been amended without approval, or part of the SSP which does not require approval upon amendment has been amended without notification.
- .4 when a Company ceases managing the ship:
- .5 when a ship changes her Flag:
- .6 when Audit fees and expenses have not been paid:
- .7 when an ISSC is issued to replace an Interim ISSC:
- .8 when a Company requests withdrawal of the ship from the ISPS Register.

5.2.3 Re-issuance of a Certificate

When a certificate is lost or damaged, please request the Head Office of the Society (Ship Management Systems Department) for re-issue of the same.

5.2.4 Revising entries on a Certificate

When the particulars, such as ship's name, indicated on the certificate are changed, an Additional Audit is required to revise the entry on the ISSC. However, when changes are made only to the name or address of the Company, no Additional Shipboard Audit is required. Where the description of the SSP regarding changes for the name or address of the Company is amended, re-approval for the revision of the SSP may be required, therefore, please contact a local office of ClassNK.

5.2.5 Returning a Certificate

The Company is requested to return the certificate to Head Office or any offices convenient in the following cases:

- .1 when a new certificate is issued through renewal or re-writing, or other reason:
- .2 when a certificate has become invalid or expired:
- .3 when a lost certificate is found after receiving a re-issued certificate

6. Type of Audit and Timing for conduct the Audit

Types of Audits are as follows:

Initial Audit: Audit to issue an ISSC to a ship for the first time

Renewal Audit: Audit to renew the ISSC within not more than 5 years.

Intermediate Audit: Audit to be conducted between the 2nd and 3rd anniversary date. (Note 1)

Additional Audit: Includes the following Audits:

- a. Additional Audit to lift any non-compliance.
- b. Additional Audit to be conducted after re-approval of an SSP.
- c. Additional Audit other than the above.
 - Name/Flag/Particular change
 - SSAS related (replacement, repair or modification)

Audit for issuing interim ISSC

(Note 1)

Anniversary date means the day and month of each year that corresponds to the date of expiry of the ISSC.

7. Application for Audit and SSP Approval

Please use the application forms “(APPLI-CSA) or (MS-APPLI-SSP)” available on our Home page. (Application Forms | ClassNK - English)

Online web application service (e-Application) for ISPS shipboard audits and SSP approval are also provided for applicants.

Please access to the contents of e-Application in our website.

(e-Application | ClassNK - English)

7.1 Application for Ship Security Plan (SSP) Approval

Please submit Applications with electronical files for SSP approval or for re-approval of amendments to the approved SSP to the local office of the Society. The application by e-Application is recommended. As for Japanese Flag ships, please submit Applications to the local offices of the Society located in Japan.

7.1.1 Initial Approval

7.1.1.1 Documents to be submitted

Please submit the following documents with electronical files when the Application of Initial SSP Approval is made.

- .1 Application form (MS-APPLI-SSP)
- .2 SSP
- .3 Report of Ship Security Assessment (SSA)
- .4 Copy of CSO's Training Certificate
- .5 Copy of (Provisional) Certificate of Registry
(To be attached in case of Non-NK Class ship)
- .6 Copy of valid DOC of ISM Code
(To be attached in case of DOC issued by other Party than NK)

Also please submit the following documents when these are not included in the SSP.

- .1 Procedure and organization chart of the Company that specify the responsibility and authority of the Company Security Officer (CSO) and other shore-based personnel relating to the ship security.

- .2 Declaration of the Company stating that Company shall give necessary assistance to the CSO and master of ship to achieve their duties relating to the ship security.

And also please submit the following documents.

- .3 Documents indicating the latest information on the following.
- i) person responsible for appointing shipboard personnel
 - ii) person responsible for deciding the employment of the ship
 - iii) parties who are chartering the ship (when ship is chartered)

7.1.1.2 Review of the SSP

The submitted SSP shall be reviewed and approved when it is verified to be in compliance with the ISPS Code. When the submitted SSP is found to be not in compliance, AIC (Auditor in charge) shall request its correction. (In case application is submitted by e-Application, the review will be smooth due to using online chat.) Approved SSP and SSA shall be stamped electronically and be returned to the Company by electronic files. The company is requested to send the files for the ship and keep them at the company. The Society shall retain only the cover page of SSP with approved stamp, record of amendments, contents of the SSP and the cover page of the SSA report. In addition to the above procedure, the Society will issue a document certifying approval of the SSP. (MS-LOA - Approval of Ship Security Plan)

7.1.2 Approval of Amendments to the approved SSP

In principle, any amendments made to the approved SSP is required re-approval. Please re-submit the SSP with electronic files to the local offices of the Society for re-approval. As for the SSP re-approval for Japanese Flag ships, please submit Applications to the local offices of the Society located in Japan. The application by e-Application is recommended. Also please be noted that a Revision list should be updated at any amendments to the SSP. In case of amendment not related to ISPS Code A/9.4.1 - A/9.4.18, or approval of such amendments are waived by the flag Administration, a formal approval procedure is not necessary to, however, it is necessary be notified to ClassNK of such amendment made to the SSP. The Society will approve as Initial approval for the amendments made to the SSP which is not approved by this Society.

7.1.2.1 Documents to be submitted

(A) Approval of the amendment to the approved SSP.

Please submit the following documents when the Application for approval of amendments to the approved SSP.

- .1 Application form (MS-APPLI-SSP)
- .2 Cover of the amended SSP (if amended or requested by the company to put the approval stamp)
- .3 Index, revision record and revised page of the SSP
- .4 Report of the SSA that resulted in the amendment to the SSP (if any) (Note 2)
- .5 Copy of existing page which shall be superseded or documents that can refer to the comparison between new and old
- .6 Copy of CSO's Training Certificate
- .7 Copy of (Provisional) Certificate of Registry
(To be attached in case of Non-NK Class ship)
- .8 Copy of valid DOC of ISM Code
(To be attached in case of DOC issued by other Party than NK)

(Note 2)

Same as the initial approval, an SSA report, including On-scene security survey shall be included in the report for the SSA submitted for the approval of the amendment accordingly, if possible.

(B) Notification of the amendments to the SSP (to which approval is not required but revision record is made).

(Amendment not related to ISPS Code A/9.4.1 - A/9.4.18, or approval of such amendments are waived by the flag Administration)

Please submit the following documents.

- .1 Application form (MS-APPLI-SSP)
- .2 Cover page of the SSP (If amended)
- .3 Index of the SSP (If amended)
- .4 Revision record of the amended SSP
- .5 Copy of existing page which shall be superseded or documents that can refer to the comparison between new and old
- .6 Pages of the SSP where amendments are made

Please be advised that companies which wish to revise some editorial correction, please submit the documents specified in 7.1.2.1 (B) above to the local offices. Please be noted that as for the editorial correction, there should be no revision in the cover, index and revision record of the SSP.

7.1.2.2 Review of amendments to the approved SSP

1. In case of above 7.1.2.1. (A), the submitted documents shall be reviewed and the SSP is re-approved when the amendment is verified to be in compliance with the ISPS Code. The re-approved SSP shall be stamped electronically and be returned to the Company by electronical files. The Company is requested to ensure replacing these pages of the SSP onboard. The Society will issue a document certifying approval of the SSP (MS-LOA-AMD, Approval of Amendments to Ship Security Plan and MS-LOA-AMD-ATT, Attachment to MS-LOA-AMD). In order to verify the implementation of the amended part of the SSP, the due date of the Additional Audit is to be specified in MS-LOA-AMD-ATT. The due date of the Additional Audit is to be specified, in general, by the next periodical Audit when the revision is made for other than the major changes or newly installation in the security equipment such as Ship

Security Alert System, monitoring devices or alarm devices.

2. In case of above 7.1.2.1.(B), the submitted documents shall be reviewed to verify that the amendments do not include any amendment which require approval. Upon completion of the review, amended pages shall be stamped electronically and then shall be returned to the company. The company is requested to send the files for the ship and to ensure the replacement. In this case, MS-LOA-AMD or MS-LOA-AMD-ATT will not be issued.

7.2 Application for Shipboard Audit

Please submit an Application for Shipboard Audit to the nearest Branch or Overseas Office of the Society, where an audit will take place

When a port or a ship has a security level 3, the Society may not accept the application because a smooth execution of security Audit may be difficult. Also please pay attention that, as a rule, when a ship is not in normal operation, such as in dry-dock or at lay-up, the Society may not undergo a Ship Security Audit, except for an Audit for issuing Interim ISSC and for an audit for the verification of SSAS installation.

7.2.1 Documents to be submitted

Please submit the following documents:

- .1 Application (APPLI-CSA)
- .2 Copy of (Provisional) Certificate of Registry
(To be attached in case of Non-NK Class ship)
- .3 Copy of DOC and SMC (or Interim SMC) of ISM Code.
(To be attached in case of DOC/SMC issued by other Party than NK)
- .4 "Certificate of proficiency" for SSO issued by the Administration
in accordance with STCW Reg. VI/5

7.3 Application for the transfer of ISPS Certification from the other IACS member society

7.3.1 If a company requests transfer of ISPS certification from the other IACS member society (hereunder referred to as "Losing Society"), please submit an application to the Society together with the following document. It will take a few days to complete the procedure including information acquisition from the losing society.

- .1 Copy of ISSC, latest DOC and SMC issued by the losing Society.
- .2 Latest records of Audit conducted by the Losing Society.
- .3 A copy of a document certifying approval of the SSP

7.3.2 It is not possible to accept a request for the transfer of ISPS certification in following cases:

- .1 when ISSC has been invalid
- .2 when change of management company is intended simultaneously
- .3 when an application is made to the Losing Society for any audit but the audit is not yet carried out
- .4 when corrective action has not been yet completed after a failure was pointed out during the previous audit by the Losing Society.

- 7.3.3 The Society will contact the Losing Society in order to obtain records of audit in the past.
- 7.3.4 The audit for the transfer is to be carried out as an Additional Audit with a scope and degree equivalent to an Intermediate Audit. However, if it is carried out at the audit window for an initial, intermediate or a renewal audit, an applicable audit is to be carried out.
- 7.3.5 The Society will issue a new Full Term ISSC, taking-over the expiry date of the previous certificate issued by the losing society in case of the completion of intermediate audit for the transfer.
- 7.3.6 In case of the Panamanian flag ship, an audit will be conducted in accordance with the instruction of Flag Administration (PanamaMMC-359 section 17). Generally, ISSC will not be re-issued by flag administration.

8. Execution of Shipboard Audit

8.1 Initial Audit, Intermediate Audit and Renewal Audit

- 8.1.1 Our Auditor will visit the ship from the Branch or Overseas Office of the Society nearest to the port (hereunder OIC). The Auditor conducts the Audit along with the Audit Plan, informed in advance, that includes an interview with the master, SSO, specific security personnel (if nominated), verification of records and checking the security measures of the ship and so on.
- 8.1.2 When a Non-conformity (NC) is found during the Initial or Renewal Audit for the Flag vessels with full term ISSC issued by the Administration (such as Panamanian Flag), ISSC shall not be issued since the Audit is not to be completed until the NC is rectified.
- 8.1.3 When a Non-conformity (NC) is found during Intermediate or Additional audit, the Auditor is to request correction of the NC, even endorsement could be made. If the correction is not taken during the audit, the Auditor is to request the Company to submit the corrective action plan using Form MS-CAP to the auditor in charge within two weeks, namely after entering a schedule not exceeding three months for implementation of the necessary corrective action onto the same. Then, if the Auditor finds the plan is appropriate, this audit is completed. The implementation of the corrective actions had been taken will be verified at next periodical shipboard audit. Considering the seriousness of the Failure (Non-conformity), the auditor may request an “Additional audit to clear the Non-conformity”.
- 8.1.4 Please pay attention, the ISSC becomes invalid if the NC is not solved by the agreed date, where the ship was requested “Additional Audit to clear the NC”.
- 8.1.5 As attendants to the Audit, please nominate some crew who are familiar with the SSP, including the master or SSO.
- 8.1.6 Prior to an initial audit, please conduct at least one security related drill onboard. If not, an auditor will require a drill during an initial audit.
- 8.1.7 Please conduct the internal audits and review at intervals specified in SSP, and keep the record onboard.
- 8.1.8 Please keep the records at least 5 years both onboard and in the company.

- 8.1.9 Please ensure that, as the audit records are considered as highly classified documents, they must be protected against unauthorized access or careless disclosure as well as the records specified in SSP.

8.2 Audit for Issuing Interim ISSC

- 8.2.1 An Audit for Issuing Interim ISSC is to be conducted by the Auditor in charge to verify the following items. Please note that an Interim ISSC is to only be issued when all of the following items have been verified.

- .1 shipboard personnel who has security duty are familiar with the duty and the responsibilities given in the SSP,
- .2 SSO is given appropriate training and kept a "Certificate of proficiency" issued by the Administration in accordance with STCW Reg. VI/5
- .3 a copy of an SSP meeting the requirements of SOLAS XI-2 and part A of ISPS Code A/9.4.1 - A/9.4.18 is available on board, has been submitted for review and approval to the flag Administration or its RSO, or has been approved by the flag Administration or its RSO, and is being implemented on the ship. The evidence showing that the SSP has been submitted to a Flag Administration or its RSO for approval is to be submitted when an application is made, if any; (for instance, in case that the SSP has been submitted to this Society, a letter of ISPS Schedule for Review and Approve of SSP (MS-SPA) was issued. The other hand, in case that the SSP has been submitted to other RSO, it is a letter of receipt by the RSO or a letter of submission and etc.)
- .4 applicable national requirements are incorporated into the SSP
- .5 at least one security related drill given in the SSP has been either carried out or planned by the SSO/CSO before the ship's departure
- .6 security equipment given in the SSP has been incorporated into the ship security system and has been maintained accordingly
- .7 all security and surveillance system given in the SSP are operational and are meeting objectives
- .8 the SSAS is verified the following item:
 - a) witnessing transmission test or receiving receipt for completed the test successfully of the SSAS
 - b) operation of the SSAS as per ISPS Code A/9.4.17 and A/9.4.18
- .9 verification of the presence of CSR meeting SOLAS Reg. XI-1/5 or confirmation to submit to the Administration for approval.

- 8.2.2 In addition, the Auditor is to verify that a copy of valid DOC (including Interim DOC) is placed onboard the ship and the valid SMC (including Interim SMC) is/will be placed onboard the ship.

8.3 Additional Audits to clear any Non-conformity

Please refer to above 8.1.4. In principle, the extent of Audit is to be limited to the areas related to the Non-conformity.

8.4 Additional Audit after Re-Approval of Amendments to the SSP approved (Change of substantial security measure etc.)

Please submit an Application for Additional Audit for verification of the amended part of the SSP, after re-approval of the SSP at the convenient opportunity but not later than the due date specified in MS-LOA-AMD-ATT when issued accompanying the re-approval of amendments to the SSP as aforementioned 7.1.2.2. In principle, the extent of the Audit shall be limited to areas related to the amended part of the SSP.

8.5 Other additional audit

8.5.1 Additional Audit for Change of Ship's Name

When a ship's name has been changed, generally, the Auditor is to visit the ship to conduct an Additional Audit. During this Additional Audit, the Auditor is to verify that the Registry Certificate and the Statutory Certificates have been changed appropriately. Where the ship's name is to be included in the transmitted data of SSAS required by the flag Administration, the Auditor is to witness a ship security alert test or verify the receiving receipt for completed the test successfully.

8.5.2 Additional Audit as required by a Flag State

Flag States may require the ship to undergo Additional Audits. In this case, the Society is to inform of the extent of the Audit to the ship, in consideration of the background of Flag State's requirement.

8.5.3 Additional audit for verification of the installation/replacement/after repair of the Ship Security Alert System
Please refer to 8.6.2 below.

8.5.4 Additional Audit due to change of ship's flag
Generally, it's required to conduct not an additional audit but an audit for issuing Interim ISSC. However, it may be possible to issue an ISSC with taking over the validity of existing one, if the following conditions are satisfied;

- .1 No change of the management company.
- .2 The SSP has been approved with new flag requirement.
- .3 Management company explained 1 and 2 above to the new flag administration and received authorization to issue the ISSC with the validity of existing certificate.

In case of change to Panama, the flag requires to conduct an audit for issuing Interim ISSC without exception.

8.6 Verification of the Ship Security Alert System (SSAS) at Initial, Periodical and Additional Audit.

8.6.1 After installation of Ship Security Alert System (SSAS), a report is to be kept onboard the ship prepared by an approved radio technician certifying successful completion of testing in order to verify compliance with the requirement SOLAS Reg. XI-2/6 paragraph 2 to 4 (Note 3). However, in case of Self-Contained SSAS ("SSAS-SC" - see Note 4), such a report can be prepared by an SSO after relevant testing.

Note 3 SOLAS Reg. XI-2/6

2 The ship security alert system, when activated, shall:

.1 initiate and transmit a ship-to-shore security alert to a competent

- authority designated by the Administration, which in these circumstances may include the Company, identifying the ship, its location and indicating that the security of the ship is under threat or it has been compromised;*
- .2 not send the ship security alert to any other ships;*
- .3 not raise any alarm on-board the ship; and*
- .4 continue the ship security alert until deactivated and/or reset.*
- 3 *The ship security alert system shall:*
 - .1 be capable of being activated from the navigation bridge and in at least on other location; and*
 - .2 conform to performance standards not inferior to those adopted by the Organization.*
- 4 *The ship security alert system activation points shall be designed so as to prevent the inadvertent initiation of the ship security alert.*

Note 4 Self-Contained SSAS

The following definition is given in the Procedural Requirement established by IACS (PR24) " a SSAS which does not require any interface with, and/or depends on input from, radio and/or navigational equipment required by SOLAS IV and V to meet the performance standards required by SOLAS XI-2/6."

- 8.6.2 At the initial verification after installation of the SSAS, the following items will be verified:
 - .1 a description on the SSAS is incorporated into the SSP onboard.
 - .2 verify the report prepared in accordance with paragraph 8.6.1 above.
 - .3 attending transmission testing or verifying receiving receipt for completed the test successfully.
 - .4 verify the requirement as per ISPS Code A/9.4.17 & A/9.4.18
- 8.6.3 At the subsequent periodical audit, (Initial, Intermediate & Renewal Audit), the following will be verified:
 - .1 examining record of maintenance, calibration & testing as required by ISPS Code A/10.1.10
 - .2 examining record of transmission testing
 - .3 verifying requirement given in ISPS Code A/9.4.17 & A/9.4.18