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To: Recognised Organisations / Recognised Security Organisations, Designated Person Ashore, Company Security Officer of Hong Kong Registered Ships, Hong Kong Registered Ship Owners, Managers and Operators

Security and Quality Advisory No. 34
Extension of Interim International Ship Security Certificate (ISSC)
and Safety Management Certificate (SMC)

This Administration has recently received a number of applications for extension of Interim International Ship Security Certificate (ISSC) and Safety Management Certificate (SMC) due to a deficient arrangement of initial audit to the vessel by the ship management companies. In few occasions the Marine Department was only notified of the impending expiry date of the Interim ISSC and SMC after the vessel had proceeded to sea.

We must point out that the monitoring of validity of ship's trading certificates is a key function to the ship management. Under all circumstances, the ship management company must plan the arrangement of revalidation well ahead of the expiry date of the trading certificates taking into account the schedule of their vessels, logistics provided by the local agents and services supported by the Recognised Organisations (ROs) / Recognised Security Organisations (RSOs).

In accordance with section 19.4.4 of the International Ship and Port Facility Security (ISPS) Code an Interim ISSC may not be extended. This Administration declines to consent a subsequent or consecutive ISSC to be issued to a ship if the company is to avoid or attempts to avoid full compliance of the requirement beyond the period of the Interim ISSC, such as inaction to making arrangement for Initial ISPS Audit at early stage taking into account the ship's future voyage and the remaining period of the Interim ISSC.

Section 14.3 of International Safety Management (ISM) Code also states that the extension of Interim SMC may only be granted in special cases. It would imply

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that the arrangement of the initial audit needs to be well planned with all possible conditions to be taken into account e.g. auditor availability, trading area, change of trading pattern etc.

Under the circumstances, this Administration is reluctant to issue without valid justification, a subsequent Interim ISSC or SMC in a situation where an earlier and pre-planned schedule for an initial ISSC or SMC audit is deficient. Special case is only restricted to those conditions which are unavoidable, unforeseeable and cannot be overcome.

A handwritten signature in black ink, appearing to read 'Y.K. LI', with a stylized flourish at the end.

(Y.K. LI)

Senior Surveyor/Security & Quality Assurance Section
for Director of Marine