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The MARPOL 73/78 does not prohibit the IOPP renewal survey to be carried out before the window period from other statutory surveys covered in Resolution A.883(21),Global and Uniform Implementation of the Harmonized System of Survey and Certification(HSSC). MARPOL Annex I, regulation 10.2.3 specifies that "When the (IOPP) renewal survey is completed more than 3 months before the expiry date of the existing certificate, the new certificate shall be valid from the date of completion of the renewal survey to a date not exceeding 5 years from the date of completion of the renewal survey".

The HSSC was adopted essentially for the benefit of the ship owners / managers. Ship owners / managers may choose to de-couple (de-harmonize) the IOPP renewal survey from the other surveys and flag authorization is not required.

ROs acting on our behalf are required to ensure that the survey scope of the renewal survey carried out in advance complies fully with the relevant requirements and regulations in force at the time of the survey.