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15 July 2013

To: Shipowners / Ship Managers / Ship Masters and Recognized Organization

Dear Sir/Madam,

**Audit of ISM Activities Performed in Places other than
the Company Address Registered in DOC**

We noticed in several occasions the shipping management companies carried out ISM activities regularly in places other than the company address registered in DOC. And different companies adopted different format or name for their establishments. However, if the company has direct control of its establishment, the establishment should then be taken as the branch office of the company.

We have stated in the Frequently Asked Questions (FAQ) posted in our website (http://www.mardep.gov.hk/en/pub_services/pdf/ism_faq.pdf), that any branch office of the shipping management company which performs ISM function should have its address stated on the DOC. And the activities would be subject to both internal and external audit. The DOC of the companies should neither be issued nor endorsed if the aforesaid audit requirements have not been met with.

Please also be reminded that the company address registered in the DOC is particularly important. Firstly, it identifies the company which has assumed the responsibility for the operation of the ship. Secondly, it would determine the concerned legislation the company needs to comply with. Therefore, the address should be precise and accurate. And the addresses of those locations holding no ISM activities should not be printed on the DOC to avoid ambiguity.

Should you have any query on this matter, please do not hesitate to contact us.

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Yours faithfully,



(S.H. Wan)
Senior Surveyor / International Safety Management Section
for Director of Marine