

Subject :

Guidance for IACS Auditors to the ISM Code

NKTECHNICAL INFORMATION

No. : 229

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To Ship Owners and Ship Management Companies concerned

Dear Sir(s)

“Guidance for IACS Auditors to the ISM Code (April 1997)” has been established by the IACS (International Association of Classification Societies). ClassNK has followed these guidance together with IMO Guidelines (Resolution A.788(19) for the ISM Code Certification.

These IACS Guidance shall be attached your reference.

If you need more information about these matters, please do not hesitate to contact us.
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Attached

1. Guidance for IACS Auditors to the ISM Code (April 1997)

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GUIDANCE FOR IACS AUDITORS TO THE ISM CODE

IMO Resolution A.748(18)

ANNEX

INTERNATIONAL MANAGEMENT CODE FOR THE SAFE OPERATION OF SHIPS AND FOR POLLUTION PREVENTION (INTERNATIONAL SAFETY MANAGEMENT (ISM) CODE)

PREAMBLE

1. The purpose of this Code is to provide an international standard for the safe management and operation of ships and for pollution prevention.
2. The Assembly adopted resolution A.443(XI) by which it invited all Governments to take the necessary steps to safeguard the shipmaster in the proper discharge of his responsibilities with regard to maritime safety and the protection of the marine environment.
3. The Assembly also adopted resolution A.680(17) by which it further recognised the need for appropriate organisation of management to enable it to respond to the need of those on board ships to achieve and maintain high standards of safety and environmental protection.
4. Recognising that no two shipping companies or shipowners are the same, and that ships operate under a wide range of different conditions, the Code is based on general principles and objectives.
5. The Code is expressed in broad terms so that it can have a wide application. Clearly, different levels of management, whether shore-based or at sea, will require varying levels of knowledge and awareness of the items outlined.
6. The cornerstone of good safety management is commitment from the top. In matters of safety and pollution prevention it is the commitment, competence, attitudes and motivation of individuals at all levels that determines the end result.

INTRODUCTION

1. Scope and application

This guidance is intended for use by IACS Member Societies' auditors when performing certification under the ISM Code, unless the relevant Administration has provided special instructions that indicate otherwise.

This document is also intended to facilitate audits' consistency and uniformity among IACS by providing examples, which, however, are not to be interpreted as prescriptive solutions or checklists.

Reference is made to the following Resolutions adopted by the International Maritime Organisation (IMO):

- (a) the "International Management Code for the Safe Operation of Ships and for Pollution Prevention" (ISM Code), adopted by Resolution A.741(18) and made mandatory by Chapter IX "Management for the Safe Operation of Ships" of the SOLAS Convention;
- (b) "Guidelines on the Implementation of the ISM Code by Administrations", adopted by Resolution A.788(19) and referred in this document as the "IMO Guidelines", which are applicable to Recognised Organisations (RO) when acting at the request of Flag Administrations;
- (c) "Guidelines for the Authorisation of Organisations acting on behalf of the Administration", adopted by Resolution A.739(18) and made mandatory by Chapter XI "Special Measures to Enhance Maritime Safety" of the SOLAS Convention.

2. Application of the ISM Code by Companies

By design, the ISM Code supports and encourages the development of a safety culture in shipping. The content of a Safety Management System (SMS) will therefore be affected by Company commitment, values and beliefs, which cannot be enforced through the regulatory process. In developing and implementing their systems, Companies may have used industry guidelines, such as the ICS/ISF "Guidelines on the Application of the International Safety Management Code".

Assessing compliance with the ISM Code from detailed prescriptive management system solutions is not practical and would be inconsistent with the intent of the ISM Code, which allows a Company to develop solutions which best suit the Company and their particular operation and ship type(s), whilst ensuring basic internationally agreed standards of safety management.

As an auditor, it is important to recognise that each Company develops and implements a SMS which is the most appropriate for the Company and their particular operation and ship type(s).

3. Certification process

The verification of compliance with mandatory rules and regulations, required as part of the ISM Code, neither duplicates nor replaces the surveys required by the other statutory certificates. Compliance with the ISM Code does not relieve the Company, the Master or any other entity or person involved in the management or operation of the ship of their own responsibilities.

The verification process involves interviews of Company personnel and review of SMS documentation and records. Audit is a sampling process and is not exhaustive in nature. Issuance of certification is based upon verification that the sample is in compliance with the ISM Code. Where non-conformities have not been found and reported, it does not mean that none exist. Basic procedures for performing ISM Code verification are contained in the IACS "Procedural Requirements for ISM Code Certification", UR. 9, which reflect the IMO "Guidelines for Administrations on the Implementation of the ISM Code", Resolution A.788(19), as applicable.

4. Editorial principles

For convenience, this document incorporates the actual text of the ISM Code, followed by the relevant recommended guidance for IACS auditors. The document will be updated as necessary consistent with IACS Member Societies' experience in the audit process.

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1. GENERAL

1.1 Definitions

1.1.1 "International Safety Management (ISM) Code" means the International Management Code for the Safe Operation of Ships and for Pollution Prevention as adopted by the Assembly, as may be amended by the Organisation.

1.1.2 "Company" means the Owner of the ship or any other organisation or person such as the Manager, or the Bareboat Charterer, who has assumed the responsibility for operation of the ship from the Shipowner and who on assuming such responsibility has agreed to take over all the duties and responsibility imposed by the Code.

1.1.3 "Administration" means the Government of the State whose flag the ship is entitled to fly.

1.2 Objectives

1.2.1 The objectives of the Code are to ensure safety at sea, prevention of human injury or loss of life, and avoidance of damage to the environment, in particular, to the marine environment, and to property.

1.2.2 Safety management objectives of the Company should, inter alia: —

- .1 provide for safe practices in ship operation and a safe working environment;
- .2 establish safeguards against all identified risks; and
- .3 continuously improve safety management skills of personnel ashore and aboard ships, including preparing for emergencies related both to safety and environmental protection.

1.2.3 The safety management system should ensure:

- .1 compliance with mandatory rules and regulations; and
- .2 that applicable codes, guidelines and standards recommended by the Organisation, Administrations, classification societies and maritime industry organisations are taken into account.

1.3 Application

The requirements of this Code may be applied to all ships.

1.4 Functional requirements for a Safety Management System (SMS)

Every Company should develop, implement and maintain a Safety Management System (SMS) which includes the following functional requirements:

- .1 a safety and environmental protection policy;
- .2 instructions and procedures to ensure safe operations of ships and protection of the environment in compliance with relevant international and flag State legislation;
- .3 defined levels of authority and lines of communication between, and amongst, shore and shipboard personnel;
- .4 procedures for reporting accidents and non conformities with the provisions of this Code;
- .5 procedures to prepare for and respond to emergency situations; and
- .6 procedures for internal audits and management reviews.

Definitions in SOLAS Chapter IX (1996)

"Bulk carrier" as defined in Regulations IX / 1.6 of the SOLAS Convention means a ship which is exemplified in paragraphs 2.2, 2.3 and 2.4 of IACS Unified Requirement Z11 "Mandatory Ship Type and Enhanced Survey Programme (ESP) Notations".

Definitions in IMO Resolution A.788(19) (1996)

The following definitions are contained in the IMO Resolution A.788(19), "Guidelines on the Implementation of the ISM Code by Administrations".

"Observation" means a statement of fact made during a safety management audit and substantiated by objective evidence.

"Objective evidence" means quantitative or qualitative information, records or statements of fact pertaining to safety or to the existence and implementation of a SMS element, which is based on observation, measurement or test and which can be verified.

"Non-conformity" means an observed situation where objective evidence indicates the non-fulfilment of a specified requirement.

"Major non-conformity" means 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 as a major non-conformity.

"Safety management audit" means a systematic and independent examination to determine whether the SMS activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives.

"Safety Management System" (SMS) means a structured and documented system enabling Company personnel to effectively implement the Company safety and environmental protection policy.

Understanding of definitions in IMO Resolution A.788(19) (1996).

The following explanations of definitions in IMO Resolution A.788(19) should be used as guidance by the auditor:

"Observation" may also be a statement made by the auditor referring to the SMS which, if not corrected, may lead to a non-conformity in the future.

"Major non-conformity" may include a lack of effective and systematic implementation of the ISM Code, which poses a serious threat to personnel or ship safety or a serious risk to the environment.

The auditor should also make reference to the following definition in PR9, "Procedural Requirements for ISM Code Certification", which may be considered as an element to be reported to the Company for improving their SMS beyond the mandatory requirements of the ISM Code:

"Finding" means a non-fulfilment of objectives or requirements defined by the Company which goes beyond what should be subject to mandatory ISM Code certification. A finding does not effect the issue, endorsement or renewal of the DOC or SMC.

ISM Code - paragraph 1.2.2 (1996)

1.2.2 Safety management objectives of the Company should, inter alia:

- .1 provide for safe practices in ship operation and a safe working environment;
- .2 establish safeguards against all identified risks; and
- .3 continuously improve safety management skills of personnel ashore and aboard ships, including preparing for emergencies related both to safety and environmental protection.

In accordance with the IMO Guidelines, the objectives of mandatory application of the ISM Code are to ensure:

1. compliance with mandatory rules and regulations related to the safe operation of ships and protection of the environment; and
2. the effective implementation and enforcement thereof by Administrations.

Effective enforcement by Administrations must include verification that the SMS complies with the requirements as stipulated in the ISM Code, as well as verification of compliance with mandatory rules and regulations.

The mandatory application of the ISM Code should ensure, support and encourage that applicable codes, guidelines and standards recommended by the IMO, Administrations, classification societies and maritime industry organisations are taken into account.

These objectives encompass the effective and on-going implementation of the SMS and, to a large extent, depend on reactive and proactive improvement of the SMS functions, as part of the ISM Code.

ISM Code - paragraph 1.2.3.1 (1996)

1.2.3 The safety management system should ensure:

- .1 compliance with mandatory rules and regulations; and

The effectiveness of the SMS in ensuring compliance with mandatory requirements should be one of the criteria used by the auditor when assessing whether the SMS established by the Company complies with the ISM Code.

The Company is responsible for obtaining and maintaining within the prescribed validity dates all the certificates and documents necessary to operate the ship, in accordance with relevant rules and regulations. Inadequate performance indicates that the SMS is either deficient or not functioning effectively.

All records having the potential to facilitate verification of compliance with the ISM Code should be open to scrutiny during an examination. For this purpose, the Company should provide the auditor with statutory and classification records relevant to the actions taken by the Company to ensure that compliance with mandatory rules and regulations is maintained. In this regard, the records may be examined to substantiate their authenticity and veracity.

ISM Code - paragraph 1.2.3.2 (1996)

- .2 that applicable codes, guidelines and standards recommended by the Organisation, Administrations, classification societies and maritime industry organisations are taken into account.

The ISM Code does not require mandatory compliance with these information sources. However, the auditor may encourage companies to apply relevant codes, guidelines and standards to their particular operation, by the use of observations or findings.

Objective evidence that the Company performs a systematic review of recommended codes, guidelines and standards should be part of the audit.

ISM Code - paragraph 1.4 (1996)

1.4 Functional requirements for a Safety Management System (SMS)

Every Company should develop, implement and maintain a Safety Management System (SMS) which includes the following functional requirements:

The functional requirements of the ISM Code are to facilitate that safe practices are taken into account in ship operation through written procedures and work instructions. These functional requirements summarise the detailed SMS requirements which are described in the relevant sections of the ISM Code. The auditor would expect to find procedures and instructions defining the process which ensures compliance with mandatory international and national requirements.

ISM Code - paragraph 1.4.5 (1996)

- .5 procedures to prepare for and respond to emergency situations; and

The auditor would expect to find risks identified and contingency arrangements documented.

A.741(18)

2. SAFETY AND ENVIRONMENTAL PROTECTION POLICY

2.1 The Company should establish a safety and environmental protection policy which describes how the objectives, given in paragraph 1.2, will be achieved.

2.2 The Company should ensure that the policy is implemented and maintained at all levels of the organisation both ship based as well as shore based.

ISM Code - paragraph 2.1 (1996)

2.1 The Company should establish a safety and environmental protection policy which describes how the objectives, given in paragraph 1.2, will be achieved.

It is the responsibility of the Company to define and document the safety management objectives, which form an integral part of the SMS. The Company policy should describe how the objectives stated by the ISM Code are to be achieved. To this end, the Company should provide a "statement" with a brief indication of objectives and measures adopted to achieve them.

The safety management objectives and requirements of a Company may be set above those standards required by the ISM Code. Such objectives and requirements, consistent with an intent to improve safety and pollution prevention, should be encouraged and supported by the auditor.

It is the responsibility of the auditor to verify the completeness, adequacy and effective functioning of the SMS. Non-conformities should not be raised on part(s) of the SMS outside the scope of the mandatory ISM Code requirements. These should be reported as "findings" related to matters which are not mandatory under the ISM Code.

A.741(18)

3. COMPANY RESPONSIBILITIES AND AUTHORITY

3.1 If the entity who is responsible for the operation of the ship is other than the owner, the owner must report the full name and details of such entity to the Administration.

3.2 The Company should define and document the responsibility, authority and interrelation of all personnel who manage, perform and verify work relating to and affecting safety and pollution prevention.

3.3 The Company is responsible for ensuring that adequate resources and shore based support are provided to enable the designated person or persons to carry out their functions.

ISM Code - paragraph 3.1 (1996)

3.1 If the entity who is responsible for the operation of the ship is other than the owner, the owner must report the full name and details of such entity to the Administration.

The "Company", as defined in 1.1.2 of the ISM Code when other than the owner of the ship, is synonymous with the "entity" referred to in clause 3.1.

A Company can contract with third parties to manage specific ship related activities (e.g. manning, technical support and maintenance). It is the responsibility of the Company to identify in the SMS the role of each subcontractor performing elements covered by the ISM Code. With such a contracting arrangement, only one DOC can be issued to the Company.

Any responsibility imposed by the ISM Code which is subcontracted therefore continues to remain the responsibility of the Company.

The auditor should be satisfied during a DOC assessment that the Company is in control of all activities associated with the SMS which have been subcontracted. The Company remains responsible for and must hold all the objective evidence necessary to demonstrate that subcontractors are in compliance with Company's policies and procedures associated with their particular services.

The auditor should satisfy himself that the owner has reported the details of the Company to the relevant Flag State.

ISM Code - paragraph 3.2 (1996)

3.2 The Company should define and document the responsibility, authority and interrelation of all personnel who manage, perform and verify work relating to and affecting safety and pollution prevention.

The auditor may find diagrammatic charts and/or job descriptions to identify positions related to safety and pollution prevention activities for each functional area, ashore and on board.

ISM Code - paragraph 3.3 (1996)

3.3 The Company is responsible for ensuring that adequate resources and shore based support are provided to enable the designated person or persons to carry out their functions.

The designated person(s) may formally require the top management to provide resources, when deemed necessary to carry out their functions. The top management is responsible for evaluating the proposal and decide accordingly.

A.741(18)

4. DESIGNATED PERSON(S)

To ensure the safe operation of each ship and to provide a link between the Company and those on board, every Company, as appropriate, should designate a person or persons ashore having direct access to the highest level of management. The responsibility and authority of the designated person or persons should include monitoring the safety and pollution prevention aspects of the operation of each ship and to ensure that adequate resources and shore based support are applied, as required.

ISM Code - paragraph 4. (1996)

The designated person(s) should have sufficient experience to understand if procedures and processes are correctly followed on board. This implies that he should possess appropriate knowledge and experience in the marine field in order to be effective in carrying out his responsibilities.

The designated person(s) may collect and maintain information from ship operation, including requests for spare parts, follow-up procedures and correction of non-conformities. An important role is the communication link between the ship and the shore. That could include exchange of correspondence for monitoring performance, resolution of action items and recommendations. Ship visits by the designated person(s) may be necessary to help build relationships and understanding of each others roles. The absence of visits may be an indicator that an auditor should examine more closely the effectiveness of the communication chain. It may also indicate a lack of resources required in paragraph 3.3 of the ISM Code.

The organisational structure of a Company should confirm that the designated person has direct access to the highest level of management. This is to allow the designated person to inform the top management on the ongoing status, recommendations and requests for resources associated with safety and pollution prevention activities so that the necessary corrective actions can be promptly adopted.

Where the Master is the owner of the Company and the SMS functions are carried out on board, it may not be appropriate to appoint a designated person ashore.

A.741(18)

5. MASTER'S RESPONSIBILITY AND AUTHORITY

5.1 The Company should clearly define and document the Master's responsibility with regard to:

- .1 implementing the safety and environmental protection policy of the Company;
- .2 motivating the crew in the observation of that policy;
- .3 issuing appropriate orders and instructions in a clear and simple manner;
- .4 verifying that specified requirements are observed; and
- .5 reviewing the SMS and reporting its deficiencies to the shore based management.

5.2 The Company should ensure that the SMS operating on board the ship contains a clear statement emphasising the Master's authority. The Company should establish in the SMS that the Master has the overriding authority and the responsibility to make decisions with respect to safety and pollution prevention and to request the Company's assistance as may be necessary.

ISM Code - paragraph 5.1 (1996)

5.1 The Company should clearly define and document the Master's responsibility with regard to:

The Company, taking into account its organisation, type of ships and service, should define and document the responsibilities and methods expected by the Master to carry out these functions.

The Master's responsibility in a broad sense may be found in any part of the documented system.

ISM Code - paragraph 5.1.1 (1996)

- .1 implementing the safety and environmental protection policy of the Company;

"Implementation of the safety and environmental protection policy" on board is under the responsibility of the Master. Effective implementation of this could be audited through interviewing Officers and crew.

ISM Code - paragraph 5.1.2 (1996)

- .2 motivating the crew in the observation of that policy;

"Motivation of the crew" may be achieved by the Master explaining to them how they can personally benefit from the implementation of the policy as well as encouraging their perception of ownership.

This could be achieved through meetings between the Master or a delegated Senior Officer (e.g. at embarkation, during training or safety drills) and crew members who are requested to participate in the fulfilment of the Company objectives and continuous improvement of the safety management system.

Motivation of the crew may be ascertained through interviews.

ISM Code - paragraph 5.1.3 (1996)

- .3 issuing appropriate orders and instructions in a clear and simple manner;

Examples may include Master's standing orders and bridge night order book.

ISM Code - paragraph 5.1.4 (1996)

- .4 verifying that specified requirements are observed; and

The Master may delegate verification to Officers but retains responsibility to ensure that the methods defined and documented by the Company are used.

A checklist could be useful for the Master to verify that specific requirements are observed through actions/activities performed by crew members.

The auditor may verify how these activities are carried out on board through direct observation and/or by interviewing the crew.

ISM Code - paragraph 5.1.5 (1996)

- .5 reviewing the SMS and reporting its deficiencies to the shore based management.

The Master, as responsible person onboard, should inform the Company whenever there are deficiencies in the SMS relevant to the ship's operation.

Information on SMS deficiencies should include proposals for corrective action and recommendations for improving the SMS, as far as possible.

The auditor should expect that the Company has defined when and how the Master carries out the SMS reviews aboard ship.

ISM Code - paragraph 5.2 (1996)

5.2 The Company should ensure that the SMS operating on board the ship contains a clear statement emphasising the Master's authority. The Company should establish in the SMS that the Master has the overriding authority and the responsibility to make decisions with respect to safety and pollution prevention and to request the Company's assistance as may be necessary.

The SMS should state the Master's overriding authority and discretion to take whatever action is considered necessary in the best interest of crew, passengers, the ship and environment.

The overriding authority of the Master applies to all circumstances.

The auditor should verify that the Company has definitively documented that the Master has an overriding responsibility and authority on shipboard operations as prescribed in Resolution A.443(XI) "Decision of the Shipmaster with regard to Maritime Safety and Marine Environment Protection".

A.741(18)

6. RESOURCES AND PERSONNEL

6.1 The Company should ensure that the Master is:

- .1 properly qualified for command;
- .2 fully conversant with the Company's SMS; and
- .3 given the necessary support so that the Master's duties can be safely performed.

6.2 The Company should ensure that each ship is manned with qualified, certificated and medically fit seafarers in accordance with national and international requirements.

6.3 The Company should establish procedures to ensure that new personnel and personnel transferred to new assignments related to safety and protection of the environment are given proper familiarisation with their duties. Instructions which are essential to be provided prior to sailing should be identified, documented and given.

6.4 The Company should ensure that all personnel involved in the Company's SMS have an adequate understanding of relevant rules, regulations, codes and guidelines.

6.5 The Company should establish and maintain procedures for identifying any training which may be required in support of the SMS and ensure that such training is provided for all personnel concerned.

6.6 The Company should establish procedures by which the ship's personnel receive relevant information on the SMS in a working language or languages understood by them.

6.7 The Company should ensure that the ship's personnel are able to communicate effectively in the execution of their duties related to the SMS.

ISM Code - paragraph 6.1.1 (1996)

6.1 The Company should ensure that the Master is:

- .1 properly qualified for command;

The Master's qualification for command to be verified by the Company before assignment to a ship may be determined with reference to the following examples:

- (i) certificate of competency, including validity and authenticity, complies with relevant Flag State and STCW requirements;
- (ii) previous seagoing experience on the same type of ship;
- (iii) performance reports, including those from previous employers;
- (iv) additional specific company requirements.

ISM Code - paragraph 6.1.2 (1996)

.2 fully conversant with the Company's SMS; and

The Company should ensure that the Master is "**fully conversant**" with all requirements relating to safety and environmental protection, for instance by:

- (i) including such requirements in operating instructions,
- (ii) describing job responsibilities,
- (iii) carrying out formal meetings with the shore management.

The auditor should expect the Master to demonstrate familiarity with the SMS during onboard interviews. To assist this purpose, the auditor may find records of participation in regular meetings with the Company's management, attendance at seminars or training sessions on the SMS.

ISM - paragraph 6.1.3 (1996)

.3 given the necessary support so that the Master's duties can be safely performed.

Examples to support the Master's duties from the Company may include:

- (i) maintaining required complement and onboard expertise,
- (ii) responding to identified deficiencies in the SMS.

ISM Code - paragraph 6.2 (1996)

6.2 The Company should ensure that each ship is manned with qualified, certificated and medically fit seafarers in accordance with national and international requirements.

"Manning requirements" are described in Flag Administration's regulations and may be exceeded by Company preference.

The standards for certification and training of specific shipboard assignments for licensed and unlicensed personnel are described in the STCW Convention, as amended. The Company has to be familiar with such requirements consistent with ship type(s) and operation.

"Qualification of personnel" may be ensured by adopting a policy for recruitment (e.g. evaluation of personal CV, information from other Companies, interviews), selection of personnel (e.g. by an appraisal system) and, as far as possible, embarkation of personnel already known by the Company.

The Company should have a system in place for selecting personnel, especially if obtained through a manning agent. A procedure may then be expected to detail how the selection process is carried out to comply with the STCW Convention, as amended.

When recruitment or manning is obtained through a manning agent, the Company should adopt a procedure for checking that its policy is followed by the agent. A procedure may be expected providing details on how the recruitment and selection process is carried out.

"Medical fitness", as required in the amended STCW Convention, should include that a reasonable policy exists and it has been implemented. Evidence of such a policy includes certificates or endorsements in seaman books and that crew members have undergone medical examination within the intervals established by the Flag Administration.

Some companies have their own medical department providing pre-employment and existing employees medical examinations. Such a policy, while beneficial, does not always detect medical problems which can exist when a crew member joins the ship.

Some Companies have established a formal drug and alcohol policy and process of screening crew. Such policy is a method by which a Company may help ensure that ship personnel remain medically fit for duty on a day to day basis. Should this exist, the auditor may include these activities in the audit.

ISM Code - paragraph 6.3 (1996)

6.3 The Company should establish procedures to ensure that new personnel and personnel transferred to new assignments related to safety and protection of the environment are given proper familiarisation with their duties. Instructions which are essential to be provided prior to sailing should be identified, documented and given.

The Company shall provide, in accordance with STCW, written instructions to the Master of each ship to which the Convention applies, setting forth the policies and procedures to be followed to ensure that all seafarers who are newly employed onboard are given a reasonable opportunity to become familiar with the shipboard equipment, operating procedures and other arrangements needed for the proper performance of their duties, before being assigned to those duties.

"New assignments" related to ship personnel may include another ship, a different job or promotion.

"Essential instructions" are those that clearly define the crew members role within the ship's organisation and ensure that they are prepared prior to taking up their duties on board. These instructions may include crew member's responsibility, authority and interrelationships with others involved in the SMS.

"Instructions prior to sailing" may include lifeboat station and responsibilities, fire station responsibilities and making available specific additional reference material associated with safety requirements from the SOLAS training manual.

"Familiarisation" is the process that allows a person embarking for the first time on a ship or transferred to new assignments to become familiar with that ship, its machinery, systems, equipment and operations. Familiarisation may be accomplished for instance by:

- (i) embarking as supernumerary,
- (ii) receiving essential information in a language the seafarer understands,
- (iii) shore side seminars sponsored by industry or Company,
- (iv) observing onboard overlap while vessel in port,
- (v) visual aids such as videos, manuals and operating instructions.

The choice and level of detail to assist familiarisation will depend on individual experience and the job responsibilities. Should individuals require essential familiarisation with an assignment prior to sailing, then the Company should identify such requirements and develop an appropriate plan. Examples may be familiarisation with the equipment on the bridge or in the engine room.

A system of familiarisation should also be applied to new or transferred shore staff where their responsibilities include safety and pollution prevention. This could include superintendents who are not familiar with a type of vessel being operated by the Company.

ISM Code - paragraph 6.4 (1996)

6.4 The Company should ensure that all personnel involved in the Company's SMS have an adequate understanding of relevant rules, regulations, codes and guidelines.

The Company should have a plan on how to provide all personnel involved in safety and pollution prevention with information on mandatory requirements of the relevant Administration(s) and applicable codes and guidelines.

Examples of how such information is communicated may be:

- (i) written instructions,
- (ii) described in job responsibilities,
- (iii) formal discussions with Company representatives.

ISM Code - paragraph 6.5 (1996)

6.5 The Company should establish and maintain procedures for identifying any training which may be required in support of the SMS and ensure that such training is provided for all personnel concerned.

The Company should identify the individual(s), ashore and onboard, having responsibility to define training needs appropriate for specific tasks, taking into account factors such as:

- (i) previous training and experience,
- (ii) required proficiency in operation of equipment,
- (iii) familiarity with new equipment,
- (iv) familiarity with equipment when transferred to different type vessel,
- (v) drills for emergencies,
- (vi) results of internal auditing.

Training may be supplemented by using visual aids, such as videos, manuals and operating instructions, or direct supervision by a superior.

ISM Code - paragraph 6.6 (1996)

6.6 The Company should establish procedures by which the ship's personnel receive relevant information on the SMS in a working language or languages understood by them.

The Company should establish the working language(s) onboard and the requested level of knowledge of foreign languages for Officers.

The details and the amount of documentation should be determined by what is necessary to ensure all appropriate shipboard personnel can understand their respective roles.

In absence of documentation translated into the working language of the crew members, the auditor would expect to find objective evidence that proper familiarisation with the safety management system, as far as applicable, had taken place. Records of respective training sessions should be maintained.

ISM Code - paragraph 6.7 (1996)

6.7 The Company should ensure that the ship's personnel are able to communicate effectively in the execution of their duties related to the SMS.

Sufficient instructions in a suitable language need to be verified, as well as ensuring an understanding of them by the crew. This could be verified by witnessing an exercise.

Verification that the ship's personnel are able to communicate may be accomplished by verifying the execution of orders given by Officers and requested by the auditor.

The auditor should verify if procedures exist that ensure effective communication on board. Documented evidence must be available, e.g. from manning agencies at the recruitment stage and during crew appraisals. Those responsible for the care of passengers during shipboard emergencies should be able to communicate with them effectively.

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7. DEVELOPMENT OF PLANS FOR SHIPBOARD OPERATIONS

The Company should establish procedures for the preparation of plans and instructions for key shipboard operations concerning the safety of the ship and the prevention of pollution. The various tasks involved should be defined and assigned to qualified personnel.

ISM - paragraph 7. (1996)

"Key shipboard operations" in the safety and pollution prevention context mean:

- (i) all those operations for which mandatory rules and regulations prescribe performance requirements or specific requirements for plans, procedures, instructions, records and checklists;
- (ii) those connected to the particular ship's type and which may affect safety and pollution prevention, to the extent established by the Company;
- (iii) those for which safe practices in ship operations and a safe working environment (ref. 1.2.1) have been recommended by the IMO, Administrations, classification societies and other industry bodies (ref. 1.2.3.2)
- (iv) those which the Company considers may create hazardous situations if not controlled by plans and instructions.

Methods of Company identification of key shipboard operations may include the following:

- (i) Company experience on those operations which may create hazardous situations if not controlled by plans and instructions;
- (ii) feedback provided from the SMS elements such as the Master's review of the SMS (ref. 5.1.5), internal audits, reports and analysis of non-conformities, accidents and hazardous occurrences;
- (iii) formalised systematic methods which the Company may decide to use as a tool for hazard identification.

Non-conformities should not be raised against the adequacy but on the implementation of such methods decided by the Company to identify key shipboard operations.

"Plans and instructions" include plans, procedures, instructions and checklists which are meant to govern or support shipboard activities related to the safety of the ship and the prevention of pollution. These should also deal with new ship types when relevant.

Examples are those routine activities which if not correctly handled could lead to hazardous situations, e.g. watchkeeping, loading, discharging, gas freeing, tank cleaning, sailing (confined waters), passage planning, pollution prevention, etc.

"Procedures for the preparation of plans and instructions" should have safety and pollution prevention as a primary objective and should include, inter alia, measures to prevent identified risks as referenced in 1.2.2.2 and 1.4.2 of the ISM Code.

The development of procedures should take into account relevant international and national mandatory rules and regulations and applicable codes, guidelines and standards for the type(s) of ship covered by the SMS. This information should be kept updated by the Company to take into account its operational experience.

The auditor would expect to find a comprehensive list of applicable codes, guidelines and standards. If not, the auditor may use a separate reference list to facilitate the audit process. The Company should be involved to confirm that the list is consistent with the Company's particular operational experience and procedures.

The verification in the Company's offices should include:

- (i) evidence that a systematic review of mandatory rules and regulations applicable to each ship type included in the DOC is carried out by the Company (ref. 1.2.3.1 and 6.4) for the purpose of identification of the plans, procedures and instructions that are required by mandatory rules and regulations for the type(s) of ships operated by the Company. This evidence may include the existence of an appropriate library of applicable rules and regulations;
- (ii) evidence of a systematic review of recommendations given in form of codes, guidelines and standards by the IMO, Administrations, classification societies or other industry bodies, which the Company has decided that are applicable to their operation. This evidence may include verification that:
 - there is a list of these references,
 - these recommendations are made available for those responsible for developing the plans and instructions for key operations;
- (iii) testing the completeness of the review by choosing a random sample of the operations for which there are requirements for plans, procedures or instructions in mandatory rules and regulations;
- (iv) verifying that the Company has established their own qualification requirements for those who are to be responsible for the development of plans, procedures and instructions for key operations; and
- (v) that this has been used as a basis for a systematic identification of the plans, procedures and instructions that are required by mandatory rules and regulations for the type(s) of ships operated by the Company;

The shipboard audit should include:

- (vi) verification that key operations are under control by random sampling of those operations. This would involve the need to witness operations and confirm that the operation is conducted in accordance with procedures and instructions and will include discussion with crew members on their specific responsibilities associated with the key operation. The random sampling would depend on the type of ship, the ship operator, time available and availability of ship's personnel.
- (vii) verification that an appropriate library of applicable rules and regulations, guidelines, codes and standards exists.

Non-conformities should be raised when such Company's plans, procedures and instructions are not implemented, or when procedures for the identification of key operations are not followed.

Non-conformities may be raised against the adequacy of methods decided by the Company to identify key shipboard operations and when there is evidence that such plans, procedures and instructions are inadequate.

The approval of the performance of operations for which plans, procedures and instructions are required by mandatory rules and regulations, such as damage control plans, are dealt with separately and independently of ISM Code audits.

"Qualified personnel" means those who are qualified to identify key operations and carry out actions requested by plans, procedures and instructions.

When developing plans and instructions for key shipboard operations, the focus is on prevention, which requires the use of personnel who have adequate technical and/or operational knowledge relevant to the Company's operations.

The auditor should not prescribe particular requirements for qualified Company personnel to perform the review process.

Identification of tasks assigned to appropriately qualified personnel is an important consideration. Checklists may be used to facilitate the process. The auditor should expect the Company to have identified risks associated with a particular type of vessel and trade. Such identification should be documented in some form. Identified risks may simply be indicated in tables of contents.

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8. EMERGENCY PREPAREDNESS

8.1 The Company should establish procedures to identify, describe and respond to potential emergency shipboard situations.

8.2 The Company should establish programmes for drills and exercises to prepare for emergency actions.

8.3 The SMS should provide for measures ensuring that the Company's organisation can respond at any time to hazards, accidents and emergency situations involving its ships.

ISM Code - paragraph 8.1 (1996)

8.1 The Company should establish procedures to identify, describe and respond to potential emergency shipboard situations.

Possible examples of emergency shipboard situations may include:

- (i) "Shore terminal related", e.g. overloading, fire, explosion;
- (ii) "Ship related", e.g. heavy weather damage, collision, grounding, fire, explosion, cargo shifting, pollution involving cargo or bunkers, flooding;
- (iii) "Personnel related", e.g. abandon ship, man overboard, serious injury, enclosed space rescue, terrorism, piracy.

Emergency planning may be included in integrated shipboard emergency plans.

An auditor would expect a Company to have documented emergency procedures applicable for use onboard the particular type of ship being operated. That would include the duties and responsibilities of crew members on board and shipboard communication methods. Use of a checklist could also be appropriate to the type of emergency.

ISM Code - paragraph 8.2 (1996)

8.2 The Company should establish programmes for drills and exercises to prepare for emergency actions.

The scope of drills should:

- (i) verify that the documented procedure is appropriate and remains effective for a given emergency;
- (ii) exercise the Company's personnel ashore and onboard in using the documented procedures to develop familiarity with a particular emergency and where necessary to make improvements to emergency response capability.

In addition to routine drills prescribed in international and national regulations, drills should also include emergency situations identified in 8.1 of the ISM Code.

The auditor should expect to find documented evidence of drills and exercises in response to emergency situations identified by the Company which demonstrate that the Company has been able to respond effectively.

The types of drills an auditor might expect to find include boat drill, man overboard drill, abandon ship drill, oil spill, emergency steering, rescue from enclosed spaces, gas drill, helicopter drill, management communication in emergencies, etc.

ISM Code - paragraph 8.3 (1996)

8.3 The SMS should provide for measures ensuring that the Company's organisation can respond at any time to hazards, accidents and emergency situations involving its ships.

The Company should have available the shoreside organisational structure, resources, means and procedures for communications and equipment for responding to a shipboard emergency. A 24 hours contact should be available for emergencies.

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9. REPORTS AND ANALYSIS OF NON-CONFORMITIES, ACCIDENTS AND HAZARDOUS OCCURRENCES

9.1 The SMS should include procedures ensuring that non-conformities, accidents and hazardous situations are reported to the Company, investigated and analysed with the objective of improving safety and pollution prevention.

9.2 The Company should establish procedures for the implementation of corrective action.

ISM Code - paragraph 9.1 (1996)

9.1 The SMS should include procedures ensuring that non-conformities, accidents and hazardous situations are reported to the Company, investigated and analysed with the objective of improving safety and pollution prevention.

Records of non-conformities, accidents, hazardous situations and relevant investigations produced by shipboard personnel and/or by the Company from operations or internal audits, should be provided to the auditor during audits to demonstrate effective functioning of the SMS.

The auditor would also expect to see the effective implementation of a documented procedure dealing with the review and analysis of the events stated above. This should include the objective for improvement.

ISM Code - paragraph 9.2 (1996)

9.2 The Company should establish procedures for the implementation of corrective action.

The Company should have procedures for carrying out the corrective actions suggested by analysis relevant to non-conformities, accidents and hazardous situations identified from internal audits and during operations.

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10. MAINTENANCE OF THE SHIP AND EQUIPMENT

10.1 The Company should establish procedures to ensure that the ship is maintained in conformity with the provisions of the relevant rules and regulations and with any additional requirements which may be established by the Company.

10.2 In meeting these requirements the Company should ensure that:

- .1 inspections are held at appropriate intervals;
- .2 any non-conformity is reported with its possible cause, if known;
- .3 appropriate corrective action is taken; and
- .4 records of these activities are maintained.

10.3 The Company should establish procedures in SMS to identify equipment and technical systems the sudden operational failure of which may result in hazardous situations. The SMS should provide

for specific measures aimed at promoting the reliability of such equipment or system. These measures should include the regular testing of stand-by arrangements and equipment or technical systems that are not in continuous use.

10.4 The inspections mentioned in 10.2 as well as the measures referred to 10.3 should be integrated in the ship's operational maintenance routine.

ISM Code - paragraph 10.1 (1996)

10.1 The Company should establish procedures to ensure that the ship is maintained in conformity with the provisions of the relevant rules and regulations and with any additional requirements which may be established by the Company.

The maintenance of the ship and equipment should be in accordance with the procedures established by the Company, taking into account international conventions, Flag and Port State regulations, classification rules, requirements from manufacturers, feedback information from failures, damages, defects and malfunctions.

Objective evidence is necessary to confirm conformance with established maintenance requirements. Examples include documented procedures and instructions for the onboard work routine and verification of their implementation in the day-to-day operation of the ship by the appropriate personnel.

There are a number of acceptable systems associated with maintenance of equipment. The choice depends on ship design and Company philosophy. The auditor should expect to find maintenance process documentation and records indicating compliance with maintenance program requirements.

ISM Code - paragraph 10.2.1 (1996)

10.2 In meeting these requirements the Company should ensure that:

- .1 inspections are held at appropriate intervals;

The Company should define the appropriate intervals and may be expected to justify their selection.

As part of shipboard responsibilities, there should be formal routine inspections of machinery, systems, equipment and structural integrity of the ship.

ISM Code - paragraph 10.2.2 (1996)

- .2 any non-conformity is reported with its possible cause, if known;

This section of the Code refers to damage, defects, malfunctioning, deficiencies concerning ship and equipment, etc.. Therefore, the term "non-conformity" in this context is not meant to refer to the definition of non-conformity against the ISM Code used in the audit process.

Shipboard personnel, as part of the day-to-day operation of the ship, should have procedures which ensure that non-conformities are reported promptly and rectified within a specified period of time.

Non-conformities which, for any reason, cannot be promptly dealt with by the ship personnel (e.g. due to lack of resources or material) or whose repair may be postponed (e.g. to the next dry dock or long stay) and which do not affect the ship's safety and environmental protection, should be included in a continuously updated list, to be available onboard and ashore.

A system should be in place to notify appropriate personnel both ashore and on board of non-conformities and appropriate corrective actions.

The SMS should include instructions when ship's personnel are unable to correct a non-conformity affecting the ship's safety or protection of the environment with available resources and material, in order to inform the appropriate person in the Company of the nature of the problem, whenever possible with proposals for corrective and preventive resolution.

ISM Code - paragraph 10.2.3 (1996)

.3 appropriate corrective action is taken; and

The Company should have documented procedures for corrective action of non-conformities which cannot be promptly corrected by the shipboard personnel. The list of routine maintenance works carried out onboard should also be available in the Company's offices.

Corrective action should involve solutions which may reduce or prevent re-occurrence of a non-conformity.

ISM Code - paragraph 10.2.4 (1996)

.4 records of these activities are maintained.

Records of inspections, maintenance, damages, defects and relevant corrective actions should be kept as objective evidence of the effective functioning of the SMS

ISM Code - paragraph 10.3 (1996)

10.3 The Company should establish procedures in its SMS to identify equipment and technical systems the sudden operational failure of which may result in hazardous situations. The SMS should provide for specific measures aimed at promoting the reliability of such equipment or systems. These measures should include the regular testing of stand-by arrangements and equipment or technical systems that are not in continuous use.

The list of critical equipment and systems can vary according to ship type and operation. Once identified, appropriate tests and other procedures should be developed to ensure reliability.

The testing and maintenance of stand-by equipment and inactive systems associated with alternatives should be part of the Company maintenance plan. Examples of inspections and tests may be :

- (i) alarms and emergency shutdowns,
- (ii) fuel oil system integrity,
- (iii) cargo system integrity,
- (iv) emergency equipment (EPIRB, portable VHF, etc.),
- (v) safety equipment (portable gas and CO₂ detectors, etc.),
- (vi) pre-arrival and pre-departure tests (of emergency steering gear, generators, emergency fire pumps, telegraphs, etc.).

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11. DOCUMENTATION

11.1 The Company should establish and maintain procedures to control all documents and data which are relevant to the SMS.

11.2 The Company should ensure that:

- .1 valid documents are available at all relevant locations;
- .2 changes to documents are reviewed and approved by authorised personnel; and
- .3 obsolete documents are promptly removed.

11.3 The documents used to describe and implement the SMS may be referred to as the "Safety Management Manual". Documentation should be kept in a form that the Company considers most effective. Each ship should carry on board all documentation relevant to that ship.

ISM Code - paragraph 11.1 (1996)

11.1 The Company should establish and maintain procedures to control all documents and data which are relevant to the SMS..

Examples of documents relevant to the SMS which need to be controlled are the safety management manual (see 11.3), other company's manuals dealing with safety and environmental protection, drawings, letters, and record books.

The Company should provide procedures, and define persons responsible for appraisal and issue of documents and data.

ISM Code - paragraph 11.2.1 (1996)

11.2 The Company should ensure that:

- .1 valid documents are available at all relevant locations;

The Company's audit report should include verification that valid documents are available at the designated locations.

ISM Code - paragraph 11.2.2 (1996)

- .2 changes to documents are reviewed and approved by authorised personnel; and

The Company should provide procedures and define responsibilities for review, approval and issue of changes to documents.

ISM Code - paragraph 11.2.3 (1996)

- .3 obsolete documents are promptly removed.

The SMS should provide procedures for removal and disposal of obsolete documents.

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12. COMPANY VERIFICATION, REVIEW AND EVALUATION

12.1 The Company should carry out internal safety audits to verify whether safety and pollution prevention activities comply with the SMS.

12.2 The Company should periodically evaluate the efficiency and when needed review the SMS in accordance with procedures established by the Company.

12.3 The audits and possible corrective actions should be carried out in accordance with documented procedures.

12.4 Personnel carrying out audits should be independent of the areas being audited unless this is impracticable due to the size and the nature of the Company.

12.5 The results of the audits and reviews should be brought to the attention of all personnel having responsibility in the area involved.

12.6 The management personnel responsible for the area involved should take timely corrective action on deficiencies found.

ISM Code - paragraph 12.1 (1996)

12.1 The Company should carry out internal safety audits to verify whether safety and pollution prevention activities comply with the SMS.

Internal audits are important to demonstrate the effective functioning and continuous implementation of the SMS. Reference may be made to the ICS/ISF "Guidelines on ISM Code Internal Audits" (under development).

Objective evidence should, *inter alia*, include records of internal annual audits performed by the Company, ashore and on board (see 3.1.2 of the IMO Guidelines). These records and relevant corrective actions are to be provided by the Company to the auditor during the initial, periodical or renewal audits.

Where internal audits are carried out by an authorised person, the auditor would need to verify the control of the authorised person by the Company.

ISM Code - paragraph 12.2 (1996)

12.2 The Company should periodically evaluate the efficiency and when needed review the SMS in accordance with procedures established by the Company.

The management review may include results of Master's review, results of internal audits, analysis/investigation results of accidents, recommendations based on statutory/classification surveys, results of implementation of the SMS and out-dated SMS in the light of new rules/regulations being brought in force.

The auditor should check what actions are taken by the Company to review the SMS in accordance with the above information.

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13. CERTIFICATION, VERIFICATION AND CONTROL

13.1 The ship should be operated by a Company which is issued a document of compliance relevant to that ship.

13.2 A document of compliance should be issued for every Company complying with the requirements of the ISM Code by the Administration, by an organisation recognised by the Administration or by the Government of the country, acting on behalf of the Administration in which the Company has chosen to conduct its business. This document should be accepted as evidence that the Company is capable of complying with the requirements of the Code.

13.3 A copy of such a document should be placed on board in order that the Master, if so asked, may produce it for the verification of the Administration or organisations recognised by it.

13.4 A certificate, called a Safety Management Certificate, should be issued to a ship by the Administration or organisation recognised by the Administration. The Administration should, when issuing the certificate, verify that the Company and its shipboard management operate in accordance with the approved SMS.

13.5 The Administration or an organisation recognised by the Administration should periodically verify the proper functioning of the ship's SMS as approved.

ISM Code - paragraph 13. (1996)

Reference should be made to the IMO "Guidelines for Administrations on the Implementation of the ISM Code" in Resolution A.788(19) and the IACS "Procedural Requirements for ISM Code Certification", UR. 9.

These guidelines are applicable either when the IACS Member Society acts on behalf of the Administration or when providing ISM Code certification services upon request of the owner on a voluntary basis.

Guidance on Duration of Audits

The table determines the duration of ISM Code verification within ranges, which take into account that there could be variations depending on each company or ship. Duration of verification is expressed in trimees of cumulative man/days (ie 8 hours/day) of an auditor or a team. the verification includes document review and company or ship audits.

	<u>INITIAL VERIFICATION</u>	<u>PERIODICAL VERIFICATION</u>	<u>RENEWAL VERIFICATION</u>
<u>COMPANY *</u>			
small (up to 20 employees **)	3 - 4	1 - 2	2 - 3
medium (between 21 and 50 employees)	4 - 5	2 - 3	2 - 4
large (more than 50 employees)	5 - 6	2 - 4	3 - 5
* within the ranges, the figures can be weighted according to the number of ship types and branch offices.			
** number of relevant employees who carry out or have responsibility to the Safety management System of the company ashore			
<u>SHIP</u>			
<u>Category I</u>			
passenger ships carrying 1500 passengers and above	2 - 4	1 - 3	2 - 3
<u>Category II</u>			
passenger ships and high speed craft carrying 300 passengers and above	2 - 3	1 - 2	2 - 3
chemical tankers			
<u>Category III</u>			
oil tankers, gas carriers, bulk carriers and other cargo ships of 500 grt and above and	1 - 2	1 - 2	1 - 2
passenger ships and high speed craft carrying less than 300 passengers			
<u>Category IV</u>			
mobile offshore drilling units (MODU) of 500 grt and above	1.5 - 2	1.5 - 2	1.5 - 2