

RUSSIAN MARITIME REGISTER OF SHIPPING



APPROVED

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Guidelines
on Certification of the Safety Management Systems in Compliance
with the Requirements of the ISM Code and of the Ships in Compliance
with the Requirements of the ISPS Code
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Annotation

As compared to the previous edition, the Guidelines have been amended as follows:

- 1) In connection with the publication of the new edition of IACS PR No. 9 (Rev. 4 Oct 2020), the text of the Guidelines is marked in red with changes in the paras 4.7.4.1 - 4.7.4.5, 4.8.2.13, 4.8.2.14, 4.9.1.6, 4.9.2.2, 4.9.3.2, 4.10.1, as well as in Note 11 and Annex 4;
- 2) Updated para 4.9.4.5 regarding the availability of copies of the audit materials during the audit of the vessel;
- 3) Updated Appendix 5 regarding the procedure of actions of the RS expert when reporting a major non-conformity / failure (MNC / MF).

1 Scope of application

1.1 The Guidelines on Certification of the Safety Management Systems (SMS) in Compliance with the Requirements of the International Safety Management (ISM) Code and of the Ships in Compliance with the Requirements of the International Code for the Security of Ships and Port Facilities (ISPS Code), hereinafter referred to as "the Guidelines", determines basic requirements of Company / ships SMS certification (ISM audit), as well as the ship security system (ISPS audit), specified by IMO, IACS and RS.

1.2 The Guidelines contain requirements to the Companies, which operate the ships, specified in Rule 2.1 of Chapter IX and Rule 2.1 of Chapter XI-2 of SOLAS-74 Convention, regardless of their date of construction.

1.3 The Guidelines are a normative document for the RS Top Management (002), Locations of the Register Head Office (hereinafter referred to as "RHO") and the RS Branch Offices with the ISM auditors / Marine Management Systems (MMS) auditors employed, hereinafter referred to as the RS auditor.

1.4 The Guidelines are developed both in Russian and English, the original version is maintained in electronic format.

2 Normative references¹

2.1 The following documents were used for development of the Guidelines:

- 1) ND No. [1-0903-0101-E](#) – International Convention for the Safety of Life at Sea (SOLAS 1974 Convention), as amended, refer to Chapter IX "Safe Operation of Ships", Chapter XI-1 "Special Measures to Enhance Maritime Safety" and Chapter XI-2 "Special Measures to Enhance Maritime Security"; "Special Measures to Enhance Maritime Security";
- 2) ND No. [1-0903-1301-E](#) – [IMO resolution A.741\(18\)](#) as amended by IMO resolution [MSC.104\(73\)](#), [MSC.179\(79\)](#), [MSC.195\(80\)](#), [MSC.273\(85\)](#) and [MSC.353\(92\)](#) – International Management Code for the Safe Operation of Ships and for Pollution Prevention (International Safety Management Code (ISM Code));
- 3) ND No. [1-0903-2101-E](#) – International Ship and Port Facility Security Code (ISPS Code);
- 4) ND No. [1-0227-009-E](#) – Procedural Requirements for the ISM Code Certification, **Rev.4 (Oct 2020)**;
- 5) ND No. [1-0227-024-E](#) – Procedural Requirements for ISPS Code Certification, Rev.2 (May 2019);
- 6) ND No. [1-0223-041-E](#) – Guidance for Auditors to the ISM Code, Rev.5 (Oct 2019);
- 7) ND No. [1-0223-081-E](#) – Guidance on the ISPS Code for Maritime Security Auditors, May 2003.

3 Terms. Definitions. Abbreviations

3.1 The terms, definitions and abbreviations used in the text of the Guidelines are given in the documents used for development of the Guidelines. Some of abbreviations are given below:

- 1) **NCR / FR** – Non-Conformity Report (ISM Code) / Failure Report (ISPS).
- 2) **RHO** – Head Office of Russian Maritime Register of Shipping.
- 3) **CSO** – Company Security Officer.
- 4) **AA** – Additional audit.
- 5) **DOC** – Document of Compliance.
- 6) **ACS** – Another Classification Society (in addition to RS).
- 7) **IMO** – International Maritime Organization.
- 8) **CS** – Classification society – IACS member.
- 9) **MLC** – Maritime Labor Convention.
- 10) **IACS** – International Association of Classification Societies.
- 11) **MA** – Flag Administration (Maritime Administration).
- 12) **ISM Code (ISMC)** - International Safety Management Code.

¹ Access to the hyperlinks, given in the Guidelines, is provided only for the RS employees. References to the RS Rules and Guidelines are given on the RS website. References to the external documents are available in the internet, on the official IMO / IACS websites. Some IMO documents are also available for the registered users at the RS integrated information resource (<http://idocs.rs-class.org>), which contain various materials of international organizations concerning shipping and useful relevant information.

- 13) **ISPS** – International Ship and Port Facility Security Code.
- 14) **ND** – Normative document.
- 15) **DP** – Company's Designated Person.
- 16) **SSA** – Ship Security Assessment.
- 17) **Department 331** – ISM and ISPS Code Department.
- 18) **CAP** – Corrective Actions Plan.
- 19) **RO** – Recognized Organization.
- 20) **SSP** – Ship Security Plan.
- 21) **PAL** – Ship Security Plan Approval Letter.
- 22) **QSCS** – Quality Management System Certification Scheme.
- 23) **PR** – IACS Procedural Requirement.
- 24) **RS** – Russian Maritime Register of Shipping.
- 25) **SMC** – Safety Management Certificate.
- 26) **ISSC** – International Ship Security Certificate.
- 27) **MLS** – Maritime Labor Certificate.
- 28) **MNC / MF** – Major Non-conformity (ISM) / Major Failure (ISPS).
- 29) **SSAS** – Ship Security Alert System.
- 30) **SSAS-SC** – Self-Contained Ship Security Alert System.
- 31) **SMS** – Safety Management System (within the ISM Code terms).
- 32) **FSI** – Ship survey by the Maritime Flag Administration.
- 33) **PSC** – Port state control.
- 34) **PSCO** – Port State Control Officer.

4 Procedural Requirements for the ISM Code Certification

4.1 Application²

4.1.1 This section is based on [IACS PR No. 9](#) – Procedural Requirements for ISM Code Certification.

Note 1: in order to facilitate usage of the primary source, this Section contains references (in a form of footnotes) to the main requirements of the original English version of PR No. 9. Some of PR No. 9 requirements are completed with the effective RS requirements.

4.2 Purpose of an audit

4.2.1 The purpose of an audit is to verify that³:

- 1) the SMS complies with the requirements of the [ISM Code](#);
- 2) the SMS is being implemented effectively and in such a way as to ensure that the objectives of the ISM Code are met.

4.2.2 The audit is based upon a sampling process. Where no non-conformities / major non-conformities have been reported, it should not be assumed that none exists⁴.

4.2.3 The ISM audit does not duplicate and it shall not be considered a substitute for other types of inspections / verifications including classification and statutory surveys. The RS auditor shall be guided by the relevant documents, issued to the Company and to the ship upon results of other surveys and shall accept them as a confirmation of compliance with the other obligatory requirements.

² Also refer to "INTRODUCTION" section and 1.2 "Scope and Application" section of PR No. 9.

³ Refer to 2.2.1 of [PR No. 9](#).

⁴ Refer to 2.2.3 of PR No. 9.

4.3 Company responsibilities pertaining to safety management audits⁵

4.3.1 The verification of compliance with the requirements of the ISM Code does not relieve the Company, its management, officers or seafarers of the obligation to comply with national and international legislation related to safety and protection of the environment.

4.3.2 The Company is responsible for:

- 1) informing relevant employees or organizational units about the objectives and scope of the audit;
- 2) appointing responsible members of staff to accompany the RS auditor(s);
- 3) providing the resources needed by the RS auditor(s) to ensure an effective and efficient verification process;
- 4) providing objective evidence as requested by the RS auditor(s);
- 5) co-operating with the RS auditor(s) to ensure that the audit objectives are achieved;
- 6) informing RS about significant changes to the SMS, which may need an additional audit by RS. These include major restructuring of the system (for example, the establishment of Branch Offices) and changes in the operations that introduce new hazards;
- 7) requesting additional audit, when required.

4.3.3 All records having the potential to facilitate verification of compliance with the ISM Code shall be open to scrutiny during an audit. For this purpose, the Company shall provide the RS auditors with statutory and classification records relevant to its ships, including statutory and classification records, issued by ACS, RO or MA. In this regard, records may be examined to substantiate their authenticity and veracity⁶.

4.3.4 The Company shall immediately notify its affected ships of that its DOC is withdrawn.⁷

4.3.5 For the Company's obligations in relation to elimination of non-conformities refer to 4.9.1.6.

4.4 The RS responsibilities

4.4.1 Criteria for verification of compliance with the requirements of the ISM Code shall be in accordance with the applicable sections of [IMO resolution A.1118\(30\)](#) – Revised Guidelines on the Implementation of the International Safety Management (ISM) Code by Administrations, and [IMO resolution A.741\(18\)](#) – International Management Code for the Safe Operation of Ships and for Pollution Prevention (International Safety Management (ISM) Code), as amended.⁸

4.4.2 The ISM Code audits shall be carried out by the RS auditors having practical knowledge of the ISM Code certification procedures and practices and qualification and experience appropriate for the size and complexity of the Company or ship to be audited⁹.

4.5 Responsibilities of the RS audit team¹⁰

4.5.1 The RS auditor is responsible for:

- 1) planning and carrying out assigned responsibilities effectively and efficiently;
- 2) complying with the applicable requirements and other appropriate directives;
- 3) reporting any major obstacles encountered in performing the audit;
- 4) organizing specialist technical assistance required to fulfil the competence requirements of the audit when necessary;
- 5) clearly communicating non-conformities and observations to the Company or shipboard management immediately;
- 6) reporting the full audit results clearly, conclusively and without undue delay;
- 7) making the audit report available to the Company or shipboard management;
- 8) verifying the effectiveness of corrective actions taken by the Company.

4.5.2 Documents and information pertaining to the certification shall be treated in confidence.

⁵ Refer to 3.9 of PR No. 9.

⁶ Refer to 2.2.2 of [PR No. 9](#).

⁷ Refer to 3.12.1 of PR No. 9.

⁸ Refer to 2.1.1 of PR No. 9.

⁹ Refer to 2.1.4 of PR No. 9.

¹⁰ Refer to Section 3.10 of PR No. 9.

4.5.3 An ISM auditor identifying a technical deficiency shall:

- 1) establish if the Company has taken appropriate action to correct the technical deficiency and in each case has notified:
 - RS Branch Office for in-service supervision when the ship is classed by RS, or
 - CS or Flag Administration responsible for the ship survey.

Note 2: information on the technical deficiency shall be sent by the means official correspondence, shall be complete, shall be arranged in an easy to understand form and include data on the Company actions to correct the technical deficiency.

- 2) establish whether the technical deficiency is a symptom of a major non-conformity in SMS and act in compliance with 4.9.2 of the Guidelines.

4.6 The audit procedure

4.6.1 Interim verification for the issue of an Interim DOC to a Company

4.6.1.1 The procedure and principles of issuing Interim DOC are described in Section 14.1 of the [ISM Code](#)¹¹.

4.6.1.2 An Interim DOC may be issued in the following cases:

- 1) The Company newly established or;
- 2) The Company takes into operation a ship of a new type. In this case the existing Document of Compliance shall be completed with new ship types (refer to Annex 1, scenario 3 of Company audit) after checking, that the Company has the safety management system, compliant with purposes specified in 1.2.3 of the [ISM Code](#), provided that that the Company shall demonstrate SMS implementation plans, compliant with all the requirements of these Code within the period of validity of the Interim Document of Compliance.

4.6.1.3 During RS verification for the issue of an Interim DOC, the Company shall demonstrate the following:

- 1) compliance with the Company term definition (refer to Chapter IX, Rule 1 of the [Convention](#));
- 2) legal aspects of taking a ship/ships into operation, for example, compliance with the requirements of the national laws / intention of ship acquisition;
- 3) compliance with the requirements of Section 3 of the ISM Code Part A;
- 4) plans for implementation of all the ISM Code provisions in the shore-based divisions of the Company and on the declared ships.

4.6.1.4 ~~To ensure the application of common approaches to conducting audits for issuance of the Interim DOC the SMS Audit Check-List for shore-based divisions (for the issue of an interim DOC), form 8.1.6-3 (refer to 4.8.2.3) is provided. The SMS Audit Check-List for shore-based divisions (for Issuance of the Interim DOC), form 8.1.6-3 (refer to 4.8.2.3) is available to facilitate verification for the issue of an interim DOC.~~

4.6.1.5 Audit for the issue of an Interim DOC includes review of the Company SMS documents¹² (refer to 4.6.2). Interim DOC may be issued upon satisfactory results¹³ of the SMS documents review and drawing-up of the relevant records, refer to 4.6.2.4.

4.6.1.6 Upon audit of the Company shore-based divisions' SMS and upon verification, that Company SMS complies with the purposes, specified in 1.2.3 of the [ISM Code](#) for the specified types of ships, RS can issue one of the following Interim DOC forms (refer to 4.7.2):

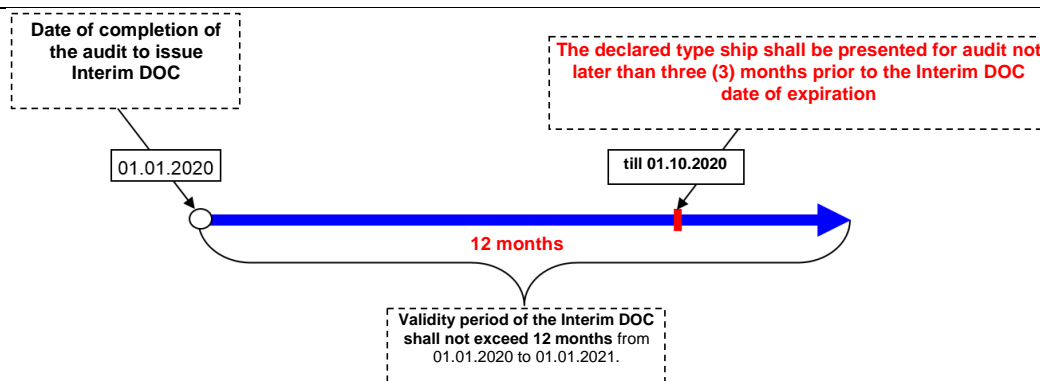
- 1) Interim DOC on the RS blank form (form 8.1.2);
- 2) Interim DOC on the blank form of the appropriate MA;
- 3) Interim DOC on the RS blank form for a Company operating the ships which are not covered by the provisions of the Convention (form 8.1.2-2), refer to 4.6.14.

4.6.1.7 Example of general structural diagram of conducting audit to issue Interim DOC:

¹¹ Refer to 3.2.1 of PR No. 9.

¹² Refer to 3.2.1 of [PR No. 9](#).

¹³ No major non-conformities identified.



4.6.1.8 Interim DOC shall be issued for a period not exceeding twelve (12) months (refer to 14.1, Part B of the [ISM Code](#)).

Interim DOC with a shorter validity period can be issued by the RS auditor, if, in compliance with an agreement between RS and MA, the Flag Administration issues an Interim DOC for a period not exceeding twelve (12) months itself¹⁴. In this case, unless otherwise specified by MA, Interim DOC with a validity period not exceeding five (5) months can be issued by the RS auditor.

4.6.1.9 Upon receipt of the Interim DOC the Company may submit its ships of types declared for issue of an Interim SMC. Ships of the type declared by the Company and specified in the Interim DOC shall be submitted for issue of the Interim SMC not later than three (3) months prior to the Interim DOC expiry date issued by RS considering the following:

- initial SMS verification of the Company to issue DOC shall include check of the Company SMS operation for at least three (3) months on board of at least one ship of each type, declared by the Company (refer to 4.6.4)¹⁵.

4.6.1.10 The Company shall make available copies of the Interim DOC to each its shore-based division / Branch Office and each ship covered by the SMS¹⁶.

Authenticity confirmation / endorsement of the Interim DOC copy is not required (refer to the last sentence of 14.1.2, Part B of the [ISM Code](#)).

4.6.2 Review of the Company SMS documents as a part of verification for the issue of an Interim DOC to the Company

4.6.2.1 Together with the audit request for the issue of an Interim DOC, the Company shall provide RS the following documents in electronic format:

- request for SMS documentation review, form 8.1.5-1 (refer to 4.7.1.1);
- SMS documentation including all key aspects of the ISM Code.

4.6.2.2 ~~To ensure the application of common approaches to the review of the company's SMS documentation an Audit Check-List on Company's SMS Documentation Review is provided (form 8.1.6-5). An Audit Check-List on Company's SMS Documentation Review is available for review of the SMS documents (form 8.1.6-5).~~

4.6.2.3 Implementation and compliance with the requirements specified in SMS documentation shall be verified only during the ISM Code audit of a Company / ship.

4.6.2.4 The following documents are available to record the results of SMS documents review:

- 1) Report (form 8.1.9);
- 2) Audit Check-List on Company's SMS Documentation Review (form 8.1.6-5);
- 3) if during the review of SMS documents non-conformities to the applicable ISM Code are identified, they shall be recorded in NCR (form 8.1.8).

¹⁴ By analogy with 3.1.1.3 of PR No. 9.

¹⁵ Refer to 3.2.2 of [PR No. 9](#).

¹⁶ By analogy with 3.1.1.2 of PR No. 9.

4.6.3 Review of amendments to the Company's SMS documentation

4.6.3.1 Verification of available amendments introduced to the Company's SMS documentation, e.g. in the Safety Management Manual and List of the Company's SMS documents shall be performed within the framework of initial, annual, renewal SMS audits of the Company, as well as the additional audits related to the review of the SMS documentation amended (refer to scenario 6 of Appendix 1 to the Guidelines).

4.6.3.2 While reviewing the amendments, the RS auditor shall verify the following, but not limited to:

- 1) implementation of the Company's procedures related to introducing amendments;
- 2) availability of amendments in the Company's Safety Management Manual and List of the Company's SMS;
- 3) whether the amendments were reviewed and approved by the authorized officer of the Company;
- 4) changes in SMS comply with the ISM Code requirements;
- 5) familiarization of the Company's / ship's employees involved in SMS with the amendments thereto.

4.6.3.3 The evidence of reviewing the amendments to the Company's SMS documentation shall be issued as follows:

- 1) note on the review of amendments shall be recorded in the Report (form 8.1.9) and SMS Audit Check-List (for the Company) form 8.1.6-1;
- 2) if during the review of amendments the non-conformities to the applicable ISM Code are identified, they shall be recorded in NCR (form 8.1.8).

4.6.4 Initial verification for the issue of a DOC to a Company

4.6.4.1 Alternatively to an Interim DOC, a DOC certifies full compliance of the Company's SMS with the applicable requirements of the ISM Code.

4.6.4.2 A DOC shall be issued to a Company following an initial or renewal verification of compliance with the requirements of the ISM Code¹⁷.

4.6.4.3 Initial verification for the issue of a DOC to a Company consists of the following steps¹⁸:

- 1) a satisfactory review of any changes made to the documented SMS since the Interim DOC was issued;

Note 3: non-conformities, recorded upon the results of SMS documents review shall be corrected prior to the initial audit (refer to 4.6.2.4.3).

- 2) verification of the effective functioning of the SMS, including objective evidence that the Company's SMS has been in operation for at least three (3) months on board at least one ship of each type operated by the Company. The objective evidence shall include records from the internal audits performed by the Company ashore and on board and the statutory and classification records for at least one ship of each type operated by the Company.

4.6.4.4 The objective evidence of the SMS functioning on board at least one ship of each type operated by the Company, shall include the following:

- 1) fulfillment of all the SMS implementation plan items;
- 2) performance of all key shipboard operations in full scope;
- 3) conducting of training drills.

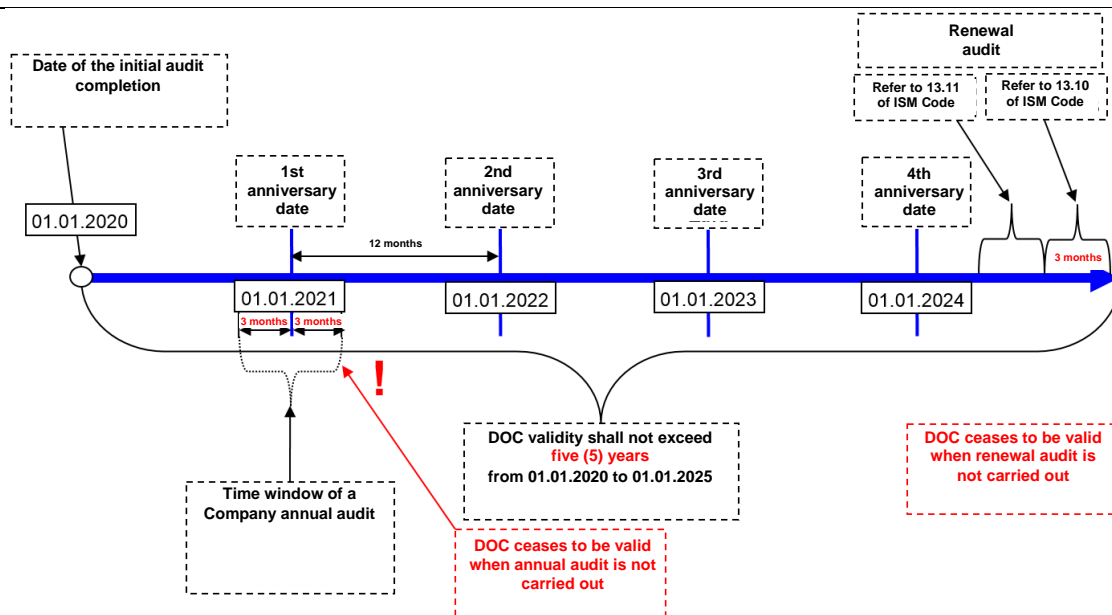
4.6.4.5 Upon the results of the initial audit of the Company shore-based divisions' SMS, provided that compliance of the Company's SMS to the requirements of the International Management Code for the Safe Operation of Ships and for Pollution Prevention (ISM Code) for the specified types of ships is certified, RS can issue one of the following DOC forms (refer to 4.7.2):

- 1) DOC on the RS blank form (form 8.1.1);
- 2) DOC on the blank form of the relevant MA;
- 3) DOC on the RS blank form for a Company operating the ships which are not covered by the provisions of the Convention (form 8.1.1-2).

4.6.4.6 Example of general structural diagram of conducting audits to issue a DOC:

¹⁷ Refer to 3.1.1.1 of PR No. 9.

¹⁸ Refer to 3.2.2 of [PR No. 9](#).



4.6.4.7 DOC shall be issued with a validity period not exceeding five (5) years (refer to 13.2 of the [ISM Code](#)).

DOC with a shorter validity period shall be issued by the RS auditor in the following cases:

- 1) if, in compliance with an agreement between RS and MA, the Flag Administration can issue a DOC for a period not exceeding five (5) years itself¹⁹. In this case, unless otherwise specified by MA, DOC with a validity period not exceeding five (5) months shall be issued by the RS auditor;
- 2) if upon results of the ship initial audit the non-conformities are reported, the RS auditor shall issue DOC with a validity period not exceeding five (5) months. Herewith, DOC with a validity period not exceeding five (5) years can be issued only when the following conditions are met:

- Company has informed the RS Branch Office responsible for control of the CAP implementation on elimination of non-conformities;
- upon satisfactory results of verification by the responsible RS Branch Office of the records issued upon the results of the Company initial audit.

4.6.4.8 Upon receipt of the DOC, the Company may submit ships of declared types for issue of a SMC with validity period not exceeding five (5) years.

4.6.4.9 According to the provisions specified in 13.4 of the [ISM Code](#), "The validity of a Document of Compliance shall be subject to annual verification...". Such verifications are called "annual audits" and carried out "within three months before or after the anniversary date". Such a period is called "time window" of an annual audit. For a five-year period of DOC validity the Company shore-based divisions shall be subject to four annual audits.

Anniversary date means the day and month of each year that corresponds to the date of expiry of the relevant document (refer to 1.1.11, Part A of the [ISM Code](#)).

4.6.4.10 Upon expiry of a DOC validity, the Company SMS renewal audit shall be performed for its renewal (refer to 13.10 – 13.11 of the [ISM Code](#)).

4.6.4.11 The Company shall make available copies of the DOC (with endorsement notes, if applicable) to each shore-based division / Branch Office and each ship covered by the SMS²⁰.

Authenticity confirmation / endorsement of the DOC copy is not required (refer to the last sentence of 13.6, Part B of the [ISM Code](#)).

¹⁹ Refer to 3.1.1.3 of PR No. 9.

²⁰ Refer to 3.1.1.2 of [PR No. 9](#).

4.6.5 Annual verification and renewal of DOC

4.6.5.1 The purpose of these audits is, inter alia, to verify the following²¹:

- 1) effective functioning of the SMS;
- 2) compliance of any modifications made to the SMS with the requirements of the ISM Code (refer to 4.6.3);
- 3) implementation of corrective actions (refer to 4.9.1.6);
- 4) availability of statutory and classification certificates, and that no surveys are overdue, refer to 4.8.2.10.

4.6.5.2 The statutory and classification certification for at least one ship of each type identified on the DOC shall be verified (refer to 4.8.2.10)²².

4.6.5.3 Requirements for annual DOC verification are specified in 13.4, Part B of the [ISM Code](#).

4.6.5.4 Requirements for renewal of the DOC are specified in 13.10 – 13.11, Part B of the [ISM Code](#).

4.6.5.5 Upon the results of the renewal audit of the Company shore-based divisions' SMS, provided that compliance of the Company SMS to the requirements of the International Management Code for the Safe Operation of Ships and for Pollution Prevention (ISM Code) for the specified types of ships is certified, RS can issue DOC for the following five (5) years, however:

- 1) when the renewal verification is completed more than three (3) months before the expiry date of the existing DOC, the new DOC shall be valid from the date of completion of the renewal verification for a period not exceeding five (5) years from the date of completion of the renewal verification (refer to 13.11, Part B of the ISM Code);
- 2) when the renewal verification is completed within three (3) months before the expiry date of the existing DOC, the new DOC shall be valid from the date of completion of the renewal verification for a period not exceeding five (5) years from the expiry date of the existing DOC (i.e. shall have the same anniversary date, refer to 13.10, Part B of the ISM Code introduced by IMO resolution MSC.104(73)).

4.6.6 Company Branch Office verification. General²³

4.6.6.1 Where a Company assigns SMS responsibilities to its Branch Offices, the verification shall include a representative sample of those offices. The sample selected shall be sufficient to ensure that all elements of the SMS and all requirements of the ISM Code can be assessed.

4.6.6.2 The audit of each Branch Office shall address each requirement of the ISM Code relevant to that office.

4.6.6.3 The Company shall have performed internal audits of all Branch Offices and relevant records shall be made available to the RS auditors.

4.6.6.4 Where the Company assigns SMS responsibilities to Branch Offices, the list of Branch Offices shall be indicated in an attachment to the DOC (form 8.1.1-1).

Also, the Branch Offices shall be included into SMS structure with description of their functions.

4.6.7 Company Branch Office verification within the initial Company DOC audit

4.6.7.1 Where the same activities are performed by all Branch Offices, the number of Branch Offices subject to be verified is:

- 1) two if the total number of Branch Offices is two or three;
- 2) three if the total number of Branch Offices is from four to six; and
- 3) to be agreed if the total number of Branch Offices is more than six.

4.6.7.2 Where different activities are performed by Branch Offices, the number of Branch Offices performing the same activities to be verified is:

- 1) two if the total number of Branch Offices performing the same activities is two or three;
- 2) three if the total number of Branch Offices performing the same activities is from four to six; and
- 3) to be agreed if the total number of Branch Offices performing the same activities is more than six.

4.6.7.3 Notwithstanding the above, if a Company nominates some office as its Head Office, it shall be audited as part of the initial verification.

²¹ Refer to 3.3.1 of PR No. 9.

²² Refer to 3.3.2 of [PR No. 9](#).

²³ Refer to Annex 1 to PR No. 9.

4.6.8 Company Branch Office verification within the annual DOC audit

4.6.8.1 Annual audit of the Company shall ensure that all its Branch Offices are visited during the period of validity of the DOC. The audit of the Branch Offices shall be agreed with the Company. The frequency of Branch Office audits shall be determined based on the nature and extent of the activities undertaken by each Branch Office.

4.6.8.2 If an additional Branch Office is included in the Company in its SMS during the period of validity of the DOC, it shall be verified not later than at the next scheduled verification at which time this additional Branch Office shall be added to Attachment to the Document of Compliance (form 8.1.1-1).

4.6.9 Organization of the Company and its Branch Offices audits

4.6.9.1 The RS Branch Office responsible for the Company supervision shall be responsible for organization and control of the Company audits and its Branch Office audits. The Head Office of the Company in this case shall be audited the last.

4.6.9.2 The audit of the Company office location shall be performed by the RS Branch Office in which area of activity the Branch Office is upon the individual request.

4.6.10 Interim verification for the issue of an Interim SMC for a ship

4.6.10.1 The procedure and principles of issuing Interim SMC are described in Sections 14.2 – 14.4 of the [ISM Code](#).

4.6.10.2 An Interim SMC may be issued in the following cases:

- 1) for new ships vessels upon their delivery;
- 2) when a Company takes responsibility over operation of a vessel, which is new for the Company;
- 3) when a ship changes the flag.

4.6.10.3 During RS verification for the issue of an Interim SMC the Company shall demonstrate the following:

- 1) legal aspects of taking a ship/ships into operation, for example, compliance with the national law requirements;
- 2) compliance with the requirements of Section 3, Part A of the [ISM Code](#);
- 3) implementation plans for all the ISM Code provisions on the declared ships.

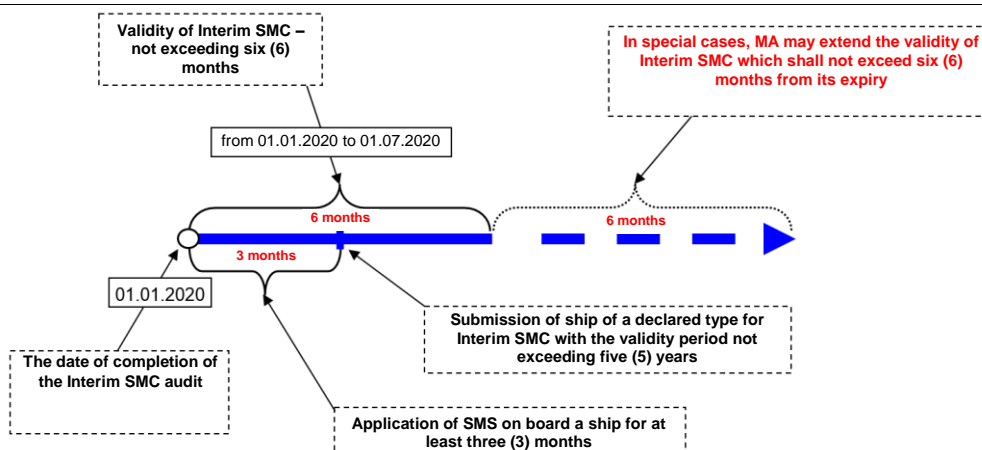
4.6.10.4 During Interim SMC audits carried out by RS, it is necessary to verify the following:

- 1) DOC or Interim DOC refers to this ship;
- 2) The Company plans to arrange an internal ship audit within three (3) months;
- 3) SMS information is presented in the working language or in the languages, understandable by the ship's crew;
- 4) the ship's crew knowledge and compliance with the requirements of the SMS documentation;
- 5) diplomas and certificates of the crew, necessary to take a position on this type of ship;
- 6) compliance of the crew members with their position instructions and functional duties while performing key operations and actions in emergencies including training drills.

4.6.10.5 Upon the results of verification for the issue of an Interim SMC to a ship, provided that compliance with the requirements of 14.4 of the [ISM Code](#) is certified and that the Company's Document of Compliance / the Interim Document of Compliance covers this type of ship RS can issue one of the following forms of the Interim SMC (refer to 4.7.2):

- 1) Interim SMC on the RS blank form (form 8.1.4);
- 2) Interim SMC on a blank form of the appropriate MA;
- 3) Interim SMC on the RS blank form for the ships which are not covered by the provisions of the Convention, (form 8.1.4-2).

4.6.10.6 Example of general structural diagram of conducting audit to issue Interim SMC:



4.6.10.7 Interim SMC shall be issued for a period not exceeding six (6) months (refer to 14.2, Part B of the [ISM Code](#)). In compliance with the provisions of 14.3, Part B, ISM Code, the interim SMC can be extended for maximum six (6) months upon its expiry only with the MA permission.

4.6.10.8 A copy of the Interim SMC (with renewal note, if applicable) shall be available at the Company's Head Office²⁴.

4.6.11 Initial verification for issuing SMC to a ship

4.6.11.1 A SMC shall be issued for a ship following an initial or renewal verification of compliance with the requirements of the ISM Code²⁵.

4.6.11.2 The issue of a SMC is conditional upon²⁶:

- 1) the existence of a DOC (not interim), valid for that type and flag of ship;
- 2) the maintenance of compliance with the requirements of a Classification Society which meets the requirements of the RO Code, as amended or with the national regulatory requirements of MA which provide an equivalent level of safety; and
- 3) the maintenance of valid statutory certificates.

4.6.11.3 The Initial verification for issuing an SMC to a ship consists of the following steps²⁷:

- 1) verification that the Company holds a valid DOC applicable to the ship type and that the other provisions of 4.6.4 are complied with. Only after onboard confirmation of the existence of a copy of a valid DOC can the verification proceed;
- 2) verification of the effective functioning of the SMS, including objective evidence that the SMS has been in operation for at least three (3) months on board the ship. The objective evidence should also include records on the internal audits performed by the Company.

4.6.11.4 Upon the results of verification for the issue of SMC to a ship, provided that compliance with the requirements of the ISM Code is certified and that the Company's Document of Compliance covers this type and flag of a ship RS can issue one of the following forms of SMC (refer to 4.7.2):

- 1) SMC on the RS blank form (form 8.1.3);
- 2) SMC on a blank form of the appropriate MA;
- 3) SMC on the RS blank form for the ships which are not covered by the provisions of the SOLAS-74 Convention (form 8.1.3-2).

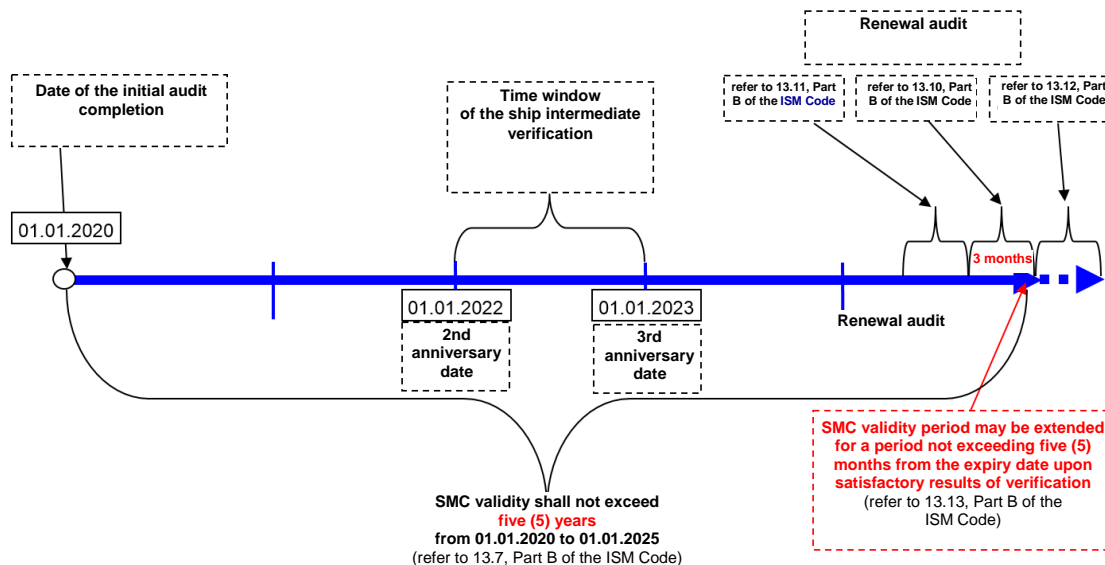
4.6.11.5 Example of general structural diagram of conducting audits to issue SMC:

²⁴ By analogy with 3.1.2.2 of PR No. 9.

²⁵ Refer to 3.1.2.1 of [PR No. 9](#).

²⁶ Refer to 3.1.2.3 of PR No. 9.

²⁷ Refer to 3.2.3 of PR No. 9.



4.6.11.6 SMC shall be issued for a period not exceeding five (5) years (refer to 13.7, Part B of the [ISM Code](#)).

SMC with a shorter validity period shall be issued by the RS auditor in the following cases:

1) if, in compliance with an agreement between RS and MA, the Flag Administration issues an SMC for a period not exceeding five (5) years itself²⁸. In this case, unless otherwise specified by MA, SMC with a validity period not exceeding five (5) months shall be issued by the RS auditor.

2) if upon results of the ship initial audit the non-conformities are reported, the RS auditor shall issue SMC with a validity period not exceeding five (5) months. Herewith, SMC with a validity period not exceeding five (5) years can be issued only when the following conditions are met:

- Company has informed the RS Branch Office responsible for control of the CAP implementation on elimination of non-conformities;
- upon satisfactory results of verification by the responsible RS Branch Office of the records issued upon the results of the ship initial audit.

4.6.11.7 As in the case with DOC, the day and month of SMC completion date is referred to as "anniversary date". Alternatively to an Interim DOC endorsed annually, the SMC validity shall be endorsed during an intermediate audit to be carried out "between the second and third anniversary dates" (refer to 13.8, Part B of the ISM Code introduced by [IMO resolution MSC.104\(73\)](#)).

4.6.11.8 SMC form implemented since 01.07.2010 in accordance with amendments introduced to the ISM Code [by IMO resolution MSC.273\(85\)](#), enables SMC validity to be extended for five (5) months more upon satisfactory results of ship SMS renewal audit, refer to 13.13, Part B of the ISM Code.

4.6.11.9 A copy of the SMC (with confirmation note, if applicable) shall be available at the Company's Head Office²⁹.

4.6.12 Intermediate verification and renewal of SMC

4.6.12.1 The purpose of these audits is, inter alia, to verify the following³⁰:

- 1) effective functioning of the SMS;
- 2) compliance of any modifications made to the SMS with the requirements of the ISM Code;

Note 4: the ship audit shall include checking availability of any amendments in SMS and that these amendments were reviewed by RS. If the amendments are not reviewed by RS, the RS auditor shall check, that the amendments

²⁸ Refer to 3.1.2.4 of PR No. 9.

²⁹ Refer to 3.1.2.2 of [PR No. 9](#).

³⁰Refer to 3.4.1 of PR No. 9.

comply with the ISM Code requirements and are implemented by the Company in accordance with SMS procedures (refer to 4.6.3).

- 3) implementation of corrective actions (refer to 4.9.1.6);
- 4) availability of valid statutory and classification certificates and absence of overdue audits, refer to 4.8.2.11.

4.6.12.2 Requirements for the intermediate SMC verification are specified in 13.8, Part B of the [ISM Code](#). Also refer to ship certification scenario 9 in Appendix 2 to the Guidelines.

4.6.12.3 Requirements for renewal SMC are specified in 13.10 - 13.14, Part B of the ISM Code.

4.6.12.4 When the renewal verification is completed more than three (3) months before the expiry date of the existing SMC, the new SMC shall be valid from the date of completion of the renewal verification for a period not exceeding five (5) years from the date of completion of the renewal verification (refer to 13.11, Part B of the ISM Code).

4.6.12.5 When the renewal verification is completed within three (3) months before the expiry date of the existing SMC, the new SMC shall be valid from the date of completion of the renewal verification for a period not exceeding five (5) years from the date of expiry of the existing SMC (i.e. shall have the same anniversary date, refer to 13.10, Part B of the ISM Code introduced by IMO resolution MSC.104(73)).

4.6.12.6 When the renewal SMS verification is completed after the expiry date of the existing SMC, the new SMC shall be valid from the date of completion of the renewal verification to a date not exceeding five (5) years from the date of expiry of the existing SMC (refer to 13.12, Part B of the [ISM Code](#)).

4.6.12.7 In relation to expiry of SMC validity period when the ship is not in the port, where it shall be audited, refer to 13.14, Part B of the [ISM Code](#).

4.6.13 Issue of a new DOC and/or SMC after withdrawal³¹

4.6.13.1 A Company whose DOC has been withdrawn should not be issued with an Interim DOC. Furthermore, a new DOC should not be issued unless an initial verification has been carried out. The expiry date of the new DOC shall be the same as that of the withdrawn document.

4.6.13.2 Where the associated SMCs are withdrawn as a result of the withdrawal of DOC caused by a major non-conformity (MNC), new SMCs shall not be issued unless the DOC has been reinstated and a verification to the scope of an initial verification has been carried out on board a representative sample of the ships. At least one ship of each type operated by the Company should be verified.

4.6.13.3 An Interim SMC shall not be issued to a ship from which the SMC has been withdrawn as a result of a MNC. Furthermore, a new SMC should not be issued unless an initial verification has been carried out on board the ship. In addition, depending on the nature of the MNC raised against the SMS implemented on board the ship, the validity of the DOC may also need to be verified by a Company audit, equivalent in scope to the annual audit, prior to the issue of the SMC. The expiry date of the new SMC shall be the same as that of the withdrawn certificate.

4.7 Preparation for audit

4.7.1 The ISM Code request

4.7.1.1 RS has developed the following request forms for the provision of ISM certification services posted at the [RS website](#):

- 1) form 8.1.5-1 – Request for SMS Audit of shore-based divisions of the Company, including review of the SMS documentation;
- 2) form 8.1.5-2 – Request for SMS Audit of a ship.

4.7.1.2 The Company shall use the valid request form for sending to the RS Branch Office. Responsibility of the Company to receive the service as regards the ISM Code is set on the second page of form 8.1.5-1 / 8.1.5-2. Also refer to 4.3.

4.7.1.3 The RS Branch Office that received the request shall review the request in compliance with the RS requirements to determine the possibility of rendering the appropriate service.

³¹ Refer to Section 3.12 of [PR No. 9](#).

4.7.2 ISM Code documents

4.7.2.1 The requirements for DOC and SMC forms are specified in Section 16, Part B of the [ISM Code](#). Templates of these forms are given in the Annex to the ISM Code.

4.7.2.2 [PR No. 9](#) contains requirements to the following records:

- 1) Audit plan (refer to Section 3.5);
- 2) Audit report (refer to Section 3.7);
- 3) Non-conformity report (refer to Section 3.8);
- 4) Notification on Invalidation DOC / SMC (refer to Annex 7).

Note 5:

- the ISM Code document forms, developed by RS, comply with the above mentioned requirements;
- the procedure for issuing and application of ISM Code document forms, developed by RS, is described in the correspondent instructions thereto.

4.7.3 Verification of compliance with Flag State requirements³²

4.7.3.1 Unless otherwise instructed by the MA, the RS auditors shall verify compliance with the Flag State requirements by sampling in the same way that compliance with other mandatory requirements is verified.

4.7.3.2 Check-lists of MA additional requirements are developed by RS for these purposes.

4.7.4 Audit plan

4.7.4.1 The Lead Auditor, assigned for the audit, in co-operation with the Company or ship shall produce an Audit plan (hereinafter referred to as "the Plan", form 8.1.9, page 2)³³.

4.7.4.2 The Plan should be designed to be flexible in order to permit changes in emphasis based on information gathered during the audit, and to permit the effective use of resources. This plan shall be communicated to all those involved in the audit³⁴.

Note 6:

- objective evidence of the Plan approval by the Company or the ship representatives prior to the audit shall be available in the RS Branch Office, in charge of the audit, for verification;
- the Plan may be amended in relation to the time and place of the audit, as well as the content of the planned activities, maintaining the approved scope of audit.

The Audit plan shall include:

- 1) position and identification of the Company / ship's personnel (having substantial direct obligations in relation to SMS) subject to the audit;
- 2) identification of the auditor(s) and Company representative(s);
- 3) language of the audit;
- 4) date and place where the audit shall be conducted;
- 5) schedule of the Company management meetings with the key SMS-related persons;
~~time for checking the additional requirements of MA (if applicable).~~

4.7.4.3 The meeting schedule shall include, without limitation, the following:

- lunch breaks and, if necessary, any intermediate meetings. These meetings may be necessary for exchange of collected information, evaluation of the audit process and, if required, for updating the allocation of obligations between the team members;
- review of the Company SMS documentation, if applicable;
- review of amendments to the Company SMS documentation, if applicable;
- checking of the Company's activities non-conformities / observations, recorded upon the results of the previous Company / ship audit, if applicable (refer to 4.8.2.7, 4.8.2.8);

³² Refer to Annex 8 of PR No. 9.

³³ Refer to 3.5.1 of [PR No. 9](#).

³⁴ Refer to 3.5.2 of PR No. 9.

- during annual and renewal audits of the Company sampling check of the effectiveness the Company's investigation, analysis, and correction of the non-conformities, reported upon the results of the ship ISM Code audits, performed by RS during the reporting period (refer to 4.8.2.7.2);
- during annual and renewal Company audits sample check of the Company's investigation, analysis, and correction of the non-conformities, reported upon the results of the previous internal and external Company and ships audits (internal audits of the shore-based divisions of the Company, any external audits, for example, by MA, PSC, internal audits by external organizations etc., except for RS ISM Codes audits (refer to 4.8.2.6);
- checking of availability of actions by the Company /ship pertaining to each of the reported observation or absence of such actions in justified cases;
- checking of the Company actions in relation to the failures reported as per [PR No. 17](#) since the previous ISM Code audit of the ship(s);
- checking of fulfillment of all elements of the ISM Code during scheduled audits (initial, intermediate, annual and renewal) and all aspects of the management of shipboard safety and pollution prevention ([refer to 4.8.2.3](#));
- [time for checking the additional requirements of MA \(if applicable\)](#);³⁵
- entry on the ISM Code and ISPS Code ship audit for alignment of the SMC and ISSC validity periods (refer to Appendix 6 to the Guidelines).

4.7.4.4 While planning and carrying out an audit, it is necessary to effectively distribute the audit duration in each audit area to meet specified objectives;

If the audit is supposed to be carried out within an audit team, the Lead Auditor shall assign to each team member, responsibility for auditing of specific processes, functions, areas and/or activities. Such assignments shall take into account the need for the independence, competence of each auditor and the effective use of available resources as well as the different roles and responsibilities of auditors, auditors-in-training and technical experts if those are expected to join the audit team.

4.7.4.5 While preparing the Plan it is necessary to consider the limitations that may be placed on the auditor's ability to gather information and collect objective evidence when audits are carried out during the hours of darkness or other similarly restrictive operational conditions. [When the activities are planned to be carried out under any restrictive operational conditions the RS auditor's ability to gather information is not to be impaired. In cases where it is not possible to complete the audit due to such limitations, audit plan may be changed as necessary to complete the audit when such limitations will be absent](#)³⁶.

4.7.4.6 Initial, intermediate and renewal shipboard verification audits shall be performed only under normal operating conditions, e.g. when the ship is not in dock, under repair or laid up. Interim SMC audits may be conducted in circumstances other than normal operating conditions, provided that the ship is fully manned in accordance with its Safe Manning Certificate³⁷ and is ready for voyage in all relations.

4.7.4.7 The following conditions must be met when carrying out ISM Code and ISPS Code audits of ship simultaneously:

- 1) stages of ISM/ISPS Code audits shall not be scheduled (reflected in the audit plans) within the identical time periods, apart from the cases of audits carried out by different RS auditors;
- 2) when audits are carried out by one RS auditor, the ISPS Code audit for a ship shall be performed prior to the ISM Code audit (refer to 1.2.3, Part A of the [ISM Code](#)).

4.7.4.8 When carrying out ISM audits of the Companies and ships, provisions of IACS Recommendation No. 41 (Annex 1) shall be met regarding the minimum audit duration taking into account that in practice there could be variations depending on each Company or ship. The audit does not include document review. Sufficient time shall be allowed for document review, as necessary.

The minimum audit duration without regard to the number of the Company personnel and ship category (refer to Annex 1 to IACS Recommendation No. 41):

- 1) during initial, annual / intermediate, renewal audits of the Company/ship take 8 hours;

³⁵ [Refer to 3 of Appendix 8 to PR No. 9.](#)

³⁶ Refer to 3.6.4 of [PR No. 9](#).

³⁷ Refer to 3.5.3 of PR No. 9.

- 2) for issue of an Interim DOC / SMC – 6 hours;
- 3) duration of additional audits is determined by the Lead Auditor in each particular case with regard to the scope and purposes of the audit.

4.7.4.9 The final version of the Plan considering amendments and specified actual dates, time of the opening meeting, interim meetings and closing meeting shall be drawn up following the audit findings.

4.8 Executing the ISM audit

4.8.1 Opening meeting

4.8.1.1 The audit shall begin with an opening meeting, the purpose of which is to³⁸:

- 1) introduce the group of the RS auditors to the Company's or shipboard management;
- 2) explain the scope and objective of the audit;
- 3) provide a short summary of the methods and procedures to be used to conduct the audit;
- 4) establish the official communication links between the RS auditor(s) and the Company or shipboard personnel;
- 5) confirm that the resources, documentation and facilities needed to perform the audit are available;
- 6) confirm the time and date of the closing meeting and any possible interim meetings.

In addition to the purposes of the opening meeting the Lead Auditor shall confirm:

- 1) that the Company is familiarized with responsibilities pertaining to SMS audits;
- 2) that the Company is familiarized with General Conditions for Rendering Services by Russian Maritime Register of Shipping, ND No. [2-040101-002-E](#);
- 3) language of the audit;
- 4) audit safety issues, emergency and security procedures for the RS auditors;
- 5) availability, role and full name of the facilitators from the Company / ship / external observes;

Note 7: facilitators and/or observers may accompany the audit team but they cannot be its members and shall not influence or interfere in the audit process).

- 6) conditions, under which the audit may be terminated (for example, major non-conformity, for which there is no downgrading), as well as the effective appeal control process on audit performance or audit results adopted by RS.

4.8.1.2 The opening meeting shall be held with participation of the management of the Company / ship to be audited and the persons responsible for SMS functions and processes subject to the audit (hereinafter referred to as "the Company / ship representatives").

4.8.1.3 The Lead Auditor shall notify the representatives of the Company / ship that in case of nonfulfillment the set scope of the Plan, the SMS audit cannot be completed. Circumstances, which prevent the completion of the audit and cannot be resolved on the spot, shall be subject to review and decision of the RS Branch Office responsible for the audit performance (refer to 4.8.2.1).

4.8.2 Checking of compliance with the ISM Code requirements

4.8.2.1 All scheduled routine Company and ship ISM audits (initial, intermediate, annual and renewal) shall be fully scoped audits covering all elements of the ISM code and all aspects of the management of shipboard safety and pollution prevention³⁹.

4.8.2.2 The Lead Auditor shall have a leading position in the course of the Company / ship audit when interviewing the key persons involved in SMS of the Company/ ship: shall be able to encourage involvement / attention of the audited, pose questions clearly and unambiguously and receive responses in a similar way, make intervals for considering replies to questions, easing tension, etc. (refer also to [ISO 19011](#) – Guidelines for Auditing Management Systems and/or Environmental Management Systems).

4.8.2.3 The following audit check-lists have been developed by RS to facilitate audits within SMS elements evaluation and recording its findings⁴⁰:

- 1) SMS Audit Check-List for Company (for issuance of the Interim DOC) form 8.1.6-3;

³⁸ Refer to 3.6.2 of PR No. 9.

³⁹ Refer to 3.6.1 of [PR No. 9](#).

⁴⁰ Refer to 3.6.3 of PR No. 9.

- 2) Ship SMS Audit Check-List (for issuance of the Interim SMC) form 8.1.6-4;
- 3) Audit Check-List on Company's SMS Documentation Review (form 8.1.6-5);
- 4) SMS Audit Check-List (for a Company) form 8.1.6-1;
- 5) SMS Audit Check-List (for a ship) form 8.1.6-2;
- 6) Check-lists of MA additional requirements.

Form 8.1.6-1 and 8.1.6-2 check-lists are developed for scheduled audits, carried out according to the established procedures (initial, intermediate, annual, renewal), which shall be completed in the full scope for all the ISM Code element, as well as for all the aspects of safe operation of ships and pollution prevention (refer to 4.8.2.1).

The questions in the check-lists shall not restrict the RS auditor's right to ask additional questions to obtain more distinct information on the Company / ship SMS as well as consider any data on SMS functioning from the Company / ship representatives during the audit.

4.8.2.4 The RS auditor should review any changes made to SMS since the last external audit carried out⁴¹ (refer to Section 4.6.3).

4.8.2.5 The RS auditor shall assess the SMS on the basis of the documentation presented by the Company and objective evidence of its effective implementation. Such evidence shall be received through interviews, review of documentation and records, observation of activities and examination of the condition and operation of the ship and its equipment and technical systems⁴².

4.8.2.6 Annual and renewal audits of the Company shall include a review of non-conformities reported in relation to previous internal and external Company and shipboard audits. The RS auditor should select a sample of the reported non-conformities and audit the Company's investigation, analysis, and resolution of the non-conformities in accordance with the requirements of sections 9 and 12 of the [ISM Code](#)⁴³.

Note 8: this case refers to the internal audits of the Company's shore-based divisions and its ships, as well as to any external audits, for example, by MA, PSC, internal audits by external organizations etc., except for RS ISM Code audits.

4.8.2.7 In relation to the non-conformities, recorded by RS upon the results of the previous ISM Code Company / ship audit (refer to 4.9.1.6), the RS auditor shall:

- 1) check the actual elimination of each of the non-conformities and fulfillment of CAP for each of the non-conformities with regard to the following:
 - the dates for elimination of the non-conformity and fulfillment of CAP are met;
 - objective evidence for elimination of the non-conformity and fulfillment of CAP are provided;
 - the non-conformity is eliminated according to the CAP;
 - the requirements of 9.2, Part A of the [ISM Code](#) are fulfilled.
- 2) during annual and renewal audits of the Company the RS auditor should select a sample of the non-conformities, reported upon the results of the previous ISM Code audits of the ship and audit the Company's investigation, analysis, and correction of the non-conformities, in accordance with the requirements of Section 9.2, Part A of the [ISM Code](#)⁴⁴.
- 3) upon receiving a request for changing a flag of the ship, which has the RS SMC, the RS auditor shall:
 - check that all the earlier reported non-conformities are eliminated / the additional assigned audits are carried out. RS can accept a ship flag change request to proceed only if the Company complies with these requirements;
 - during the audits for the issue of Interim SMC under a new flag the RS auditor shall check the actual elimination of the earlier reported non-conformities by the company.

The results of the abovementioned check shall be specified in the Report (form 8.1.9) and in every Non-Conformity Report (form 8.1.8).

⁴¹ Refer to 3.6.5 of PR No. 9.

⁴² Refer to 3.6.6 of [PR No. 9](#).

⁴³ Refer to 3.6.7 of PR No. 9.

⁴⁴ Refer to 3.6.7 of PR No. 9.

4.8.2.8 In relation to the observations, reported by RS upon the results of the previous Company / ship ISM Code audit, the RS auditor shall check availability of preventive actions, taken by the Company / the ship pertaining to each reported observation with regard to the following:

- 1) objective evidence of preventive actions is presented;
- 2) the dates of the preventive actions are met;
- 3) absence of preventive actions in justified cases;
- 4) the observation has led / has not led to a non-conformity;

The results of the check shall be specified in the Report (form 8.1.9) and in every Observation Report (form 8.1.8).

4.8.2.9 In relation to reports on deficiencies in compliance with [PR No. 17](#), issued after the last ship(s) ISM audit, the RS auditor during any further ship / Company ISM Code audit shall check the efficiency of actions, developed by the Company pertaining to such reports, for example, implementation of the deficiency elimination arrangement plan. The results of the check shall be specified in the Report (form 8.1.9).

4.8.2.10 When auditing a Company managing ships classed by ACS, or for which the MA or another RO performs the statutory surveys, the RS auditor shall review the statutory and classification survey records for at least one ship of each ship type and flag to which the DOC shall apply. These records shall be made available at the Company's office (refer to 4.3.3)⁴⁵.

4.8.2.11 When auditing a ship, as a part of the audit process the auditor shall review the statutory and classification survey records (refer to 4.3.3)⁴⁶.

4.8.2.12 The RS auditor is entitled to acquire information from other CS, ROs or MA in order to check the veracity of the information presented to the auditor by the Company (refer to 4.3.3)⁴⁷.

4.8.2.13 During ship audits the RS auditor shall visit the deck, the engine, bridge and accommodation areas. The purpose of which is to⁴⁸:

- 1) gain an overall impression of housekeeping and the condition of the ship and equipment;
- 2) observe shipboard operations ~~being conducted and emergency drills being conducted in order to make sure that the crew is familiar with their obligations and operation of the equipment and systems and that safe working practices are applied;~~
- 2)3) observe emergency drills as appropriate;
- 3)4) conduct interviews with ship's crew as appropriate.

Where weather conditions prevent safe access to certain areas this shall be documented in the Report (form 8.1.9).

4.8.2.14 The RS auditor shall determine at each scheduled audit (refer to 4.8.2.1) of the Company the ship types operated by the Company at the time of the audit. If the RS auditor discovers that the Company no longer operates a ship type listed on the DOC, the auditor should either document an observation to formally advise the Company that the ship type will be removed from the DOC if this situation persists at the next scheduled audit or immediately remove the ship type no longer operated from the existing DOC⁴⁹.

4.8.2.15 If, at a scheduled audit, the RS auditor determines that the Company has not been operating ships of a particular type since a previous scheduled audit, then DOC(s) shall be replaced with new DOC(s) reissued without the ship type no longer operated of the ship, that is not operated any more. If however, the Company continues to manage ships of a particular type within its fleet then, unless otherwise instructed by the MA, all DOC's may be endorsed for this ship type⁵⁰.

Note 9: in relation to a specific type of ship, specified in DOC and SMS refer to Appendix 4 to the Guidelines.

4.8.2.16 If the RS determines, that the Company has several DOC (different flags) and doesn't operate ships under any of the flags, then the relevant DOC shall not be subject to verification. This DOC shall not be cancelled unless the Company submits written request and shall be valid till the end of the time window of the annual audit. In this case the

⁴⁵ Refer to 3.6.8 of PR No. 9.

⁴⁶ Refer to 3.6.9 of [PR No. 9](#).

⁴⁷ Refer to 3.6.10 of PR No. 9.

⁴⁸ Refer to 3.6.11 of PR No. 9.

⁴⁹ Refer to 2.1 of Annex 4 to PR No. 9.

⁵⁰ Refer to 2.2 of Annex 4 to PR No. 9.

RS auditor shall make a record in the "Notes" field of the Report on SMS Company audit (form 8.1.9), specifying the relevant reasons.

4.8.2.17 Audit findings shall be documented in a clear, concise manner and supported by objective evidence. These shall be reviewed by the RS auditor(s) in order to determine which shall be reported as major non-conformities (refer to Section 4.9.2), non-conformities (refer to Section 4.9.1) or observations (refer to Section 4.9.3)⁵¹.

When reporting identified non-conformities, the RS auditor shall analyze the nature of the ISM non-conformities reported by RS, PSC / FSC, MA or other CS from the date of previous ISM audit conducted by RS and determine effectiveness of the ISPS Code on the date of the current audit, herewith:

- in case of newly identified repeated non-conformities, shall report major non-conformities;
- in case newly identified non-conformities differ from the previously reported, the wordings of newly identified non-conformities shall be unique and shall not repeat the wordings of non-conformities reported earlier.

4.8.2.18 When the data collected in the course of the audit certify that a major non-conformity in the SMS is available, this evidence shall be immediately brought to notice of the representatives of the Company / ship being audited (refer to Section. 4.9.2).

4.8.3 Closing meeting

4.8.3.1 At the end of the audit, prior to preparing the audit report, the RS auditor(s) should hold a meeting with the senior management of the Company or ship and those responsible for the functions concerned. The purpose of the meeting is to present major non-conformities, non-conformities and observations to the Company or the shipboard management in such a manner that they clearly understanding the results of the audit⁵².

4.8.3.2 The Lead Auditor during the ~~closing~~ meeting shall also inform the Company / ship representatives about the following:

- 1) in relation to the reported observations it shall be noted about the potential SMS flaw, which, if not corrected, may later lead to a non-conformity. To avoid such a situation, it is practicable that the Company / ship representatives shall develop and undertake preventive actions based on documented observations (refer to 4.9.3);
- 2) the Company's actions regarding the documented observations / non-conformities / major non-conformities as well as submission of a request for the additional SMS audit to RS, if such audit is assigned by RS for evaluating the effectiveness of the corrective actions taken by the Company / ship in order to verify the DOC / SMC (including the Interim DOC / SMC) validity, refer to 4.9.1.5 - 4.9.1.6.

4.9 Presentation of audit results

Note 10: this section lists general requirements for presentation / development of CAP for non-conformities, including the major non-conformities.

4.9.1 Non-conformities⁵³

4.9.1.1 The Non-Conformity Report (NCR, form 8.1.8) shall state clearly the act or situation identified as non-compliant with the Company's SMS or the ISM Code.

4.9.1.2 The content of the non-conformity report shall be complete and concise and written in such a manner as to be easily understood.

Note 11: the wording of the non-conformity shall clearly indicate non-compliance with a specific requirement of the SMS and / or ISM Code~~refer to non-compliances with the SMS and ISM Code requirements.~~

4.9.1.3 When writing NCRs auditors should, whenever possible, include a reference to the applicable requirement of the Company's SMS, and when necessary for the sake of clarity, restate the requirement. NCRs shall include a reference to the relevant clause or sub-clause of the ISM Code.

⁵¹ Refer to 3.6.12 of PR No. 9.

⁵² Refer to 3.6.~~13-12~~ of [PR No. 9](#).

⁵³ Refer to Section 3.8 of PR No. 9.

4.9.1.4 A DOC or SMC may be issued, endorsed or renewed before all identified non-conformities have been closed out provided that a schedule has been agreed between the Company and the auditor(s) for the implementation of the necessary corrective actions.

Note 12: this para shall also be applicable to the Interim DOC (when issued) and to the Interim SMC (when issued / extended).

4.9.1.5 Additional audit(s) may be necessary to confirm the validity of a DOC and/or SMC (including the Interim DOC / SMC) depending on the nature of any non-conformities identified. The Company is responsible for applying to RS for any follow-up audit required by the RS auditor.

Note 13: the agreed time period for submission of the Company / ship to the assigned AA to check that the RS reported non-conformities are eliminated and CAP is implemented shall not exceed three (3) months from the date the audit was completed.

4.9.1.6 The Company is responsible for formulating and implementing corrective actions for the non-conformities identified by the RS auditor(s). CAP shall be submitted to the RS Branch Office, which performed the audit, within the time period agreed with the Lead Auditor, but later than one (1) month from the date the audit was completed. CAP shall be approved by the Lead Auditor and shall include appropriate actions for elimination of the non-conformities, its cause analysis and actions to prevent its recurrence. The agreed time period for implementation of corrective actions shall not exceed three (3) months from the date the audit was completed. The effectiveness of the corrective actions shall be verified (refer to 4.8.2.7) not later than the next scheduled audit (annual, intermediate, renewal) and may be verified at an additional audit if performed after the agreed schedule for implementation of the corrective action.

The Company is also responsible for notifying the RS Branch Office, which performed the audit, on the actual elimination of each of the non-conformities and implementation of CAP within no later than three (3) months from the date the audit was completed.

Note 14: the Company's procedure for dealing with non-conformities is given in NCR (form 8.1.8).

4.9.1.7 The review of the Company's responses to non-conformities described in 4.8.2.6 is applicable only to non-conformities that are not considered to be major.

4.9.1.8 Nonfulfillment the agreed corrective actions, as well as not submitting the Company / ship for the assigned additional audit (refer to 4.9.1.5) shall be treated as grounds for invalidation of the DOC or SMC (including the Interim DOC or SMC).

4.9.2 Major non-conformities⁵⁴

4.9.2.1 A major non-conformity (MNC) raised on a ship must be downgraded before the ship can sail. Downgrading may take place only after verifiable action has been taken to remove any serious threats to personnel, the ship or the environment.

Note 15: the RS Lead Auditor may downgrade MNC to a non-conformity only after checking that the Company / ship perform the following actions:

- verifiable action has been taken to remove the revealed serious threats to personnel, the ship or the environment;
- serious threats to personnel, ship or the environment are eliminated before departure of the ship;
- effectiveness of these actions is confirmed by objective evidence (for example, copies of repair records, amendments to SMS documents, photos, etc.).

MNC downgrading actions shall be recorded in NCR (form 8.1.8) with the necessary evidence attached.

CAP shall be agreed for implementation of the necessary corrective actions (for approval and implementation of CAP refer to 4.9.1.6).

4.9.2.2 Following the downgrading of a MNC raised on a ship, at least one additional audit (AA) shall be carried out on board the ship within the time frame indicated in the agreed CAP (refer to 4.8.2.7) to verify that effective actions have been taken, refer to [IMO Circular MSC/Circ.1059](#). In addition to the shipboard AA, AA of the Company's shore-based divisions may also be carried out if the RS auditor deems it necessary.

⁵⁴ Refer to 3.11.1 – 3.11.7 of [PR No. 9](#).

Following the downgrading of a major non-conformity raised during DOC audit, at least one additional audit of the Company's shore-based operations should be carried out within the time frame indicated in the agreed corrective action plan to verify that effective actions have been implemented.

Note 16: assignment of ship / Company AA the RS auditor shall indicate in the Report (form 8.1.9).

4.9.2.3 If an AA of the ship / Company is carried out later than the specified time window (refer to 4.9.2.2) a MNC shall be raised.

4.9.2.4 Where MNC has been raised because the Company AA has not taken place within the specified time, the DOC related SMCs continue to remain in place without any AA provided that there is no other MNC, which has not been downgraded.

4.9.2.5 All MNC, including those that are downgraded before the completion of the audit, shall be reported to the corresponding MA as follows:

- 1) MNC identified during the audits of the Company shore-based divisions shall be reported to all MA on whose behalf DOCs have been issued and by which RS is authorized;
- 2) MNC identified during shipboard audits shall be reported only to the MA of the ship concerned.

4.9.2.6 Where the corresponding DOC has been issued by other RO than RS-~~RO~~, MNC identified during shipboard audits shall be reported to that RO.

4.9.2.7 A ~~DOC / SMC Document (Certificate) (including the Interim DOC / SMC)~~ shall not be issued, endorsed, renewed or extended before any MNC has been downgraded.

Note 17: as regards procedure for the RS auditor for notification of RHO / MA about MNC, refer to Appendix 5 to the Guidelines.

4.9.3 Observations

4.9.3.1 Observation Report (form 8.1.8) shall clearly state the fact, confirmed by objective evidence, identified as a weakness or potential deficiency in SMS, which, if not corrected, may lead to a non-conformity in the future (refer to 4.8.3.2.1).

4.9.3.2 The content of the observation shall be full and clear, as well as made in easily understandable form. The wording of the observation should clearly indicate a weakness or potential deficiency in the SMS. If the observation relates to a requirement of the Company SMS and / or para / sub-para of the ISM Code, the relevant references shall be specified in the Observation Report.

4.9.3.3 The agreed time period for implementation of preventive actions pertaining to an observation shall not exceed three (3) months from the date the audit was completed. The effectiveness of these actions shall be verified not later than the next audit, which shall be performed upon expiry of the time period, agreed for implementation of preventive actions (refer to 4.8.2.8).

4.9.4 Report on the Company SMS documentation review / SMS audit

4.9.4.1 The report shall be prepared by the lead auditor, based on information gathered by and discussed with the audit team members. It shall be accurate and complete, reflect the content of the audit and shall include the following items⁵⁵:

- 1) date of completion of the audit;
- 2) scope and objectives of the audit;
- 3) auditor(s); ~~Company / ship representatives~~;
- 4) all major non-conformities, non-conformities, and observations;
- 4)5) Audit Plan.

⁵⁵ Refer to 3.7.1 of PR No. 9.

Note 18: any additional Company / ship SMS-related information may be indicated in the Report (form 8.1.9) upon the RS auditor's decision.

4.9.4.2 The Company should maintain reports and records of all audits performed both ashore and on board its ships (refer to 4.3.3)⁵⁶.

4.9.4.3 Upon the results of RS performed Company / ship ISM Code audit the RS auditor shall issue the following records:

- 1) SMS Audit Plan (form 8.1.9, page 2);
- 2) Report on the Company SMS documentation review / SMS audit (form 8.1.9);
and also, if applicable:
relevant DOCs / SMCs;
- 3) relevant DOCs / SMCs;
- 4) NCR(s) / Observation Report(s) (form 8.1.8);
- 5) Audit Check-List on Company's SMS Documentation Review (form 8.1.6-5);
- 6) SMS Audit Check-Lists (forms 8.1.6-1, 8.1.6-2, 8.1.6-3, 8.1.6-4);
- 7) Check-lists of MA additional requirements;
- 8) Appendix to Report (form 8.1.9-1). Shall be filled in for each failure being the ground for a ship detention as well as to any failure referred by PSC to non-fulfillment of the provisions of the ISM Code and ISPS Code).

4.9.4.4 The records of the audit shall be made available to the Company or ship, as applicable⁵⁷.

Originals of the records specified in 4.9.4.3, except for SMS Audit Check-Lists, Check-lists of MA additional requirements and form 8.1.9-1 shall be submitted by the RS Lead Auditor to the Company / ship representatives upon completion of the audit.

4.9.4.5 The other documents, which shall be attached to the Report (Audit materials), if applicable, are copies of the following documents:

- 1) For verification on site:
 - NCR / Observation Reports, closed by the RS expert;
 - valid Interim DOCs and/or DOCs with endorsement notes;
 - valid Interim SMCs and/or SMCs with endorsement notes, issued not by RS, for as minimum one ship of each type and flag of each DOC, issued by RS;
 - objective evidence of the Company actions for downgrading the major non-conformity (e.g., copies of repair records, amendments to the SMS documents, photos, etc.);
 - objective evidence of SMS functioning not less than three (3) months (condition to carry out the initial audit);
 - MA authorizations to perform audits / other MA instructions.
- 2) For shipboard verification:
 - NCR / Observation Reports, closed by the RS expert;
 - valid Interim DOC and/or DOC for the type and flag of the ship with endorsement notes;
 - valid Interim SMC / SMC with endorsement notes;
 - crew list;
 - Plan for the implementation of SMS developed by the Company (during the audit for the issuance of the interim SMC);
 - the RS auditor's disagreement with PSCO issued in free form (refer to 4.11.5);
 - objective evidence of the Company actions for downgrading the major non-conformity (e.g., copies of repair records, amendments to the SMS documents, photos etc.);
 - objective evidence of SMS functioning not less than three (3) months (condition to carry out the initial audit);
 - MA authorizations to perform audits / extension of documents / other MA instructions,

as well as copies of any other documents which confirm the results of the audit as determined by the RS auditor.

⁵⁶ Refer to 3.7.3 of [PR No. 9](#).

⁵⁷ Refer to 3.7.2 of PR No. 9.

4.10 Communications with flag states and between ROs. Notification of Invalidation of DOC / SMC⁵⁸

4.10.1 In case of invalidation of the DOC and/or SMC, the MA and RO must be informed not later than 5 working days from the date of invalidation. The procedure for informing is specified in the instructions to form 8.1.22 "Notification on Invalidation of ISM Certification".

4.11 Actions Following Port State Control Detentions (PSC)⁵⁹

4.11.1 When attending a ship, with the SMC issued by RS, as a result of a Port State Control action, the RS auditor shall consider the objective evidence presented by the PSCO⁶⁰.

Note 19:

- 1) Appendix to Report (form 8.1.9-1) shall be used for review of the PSCO objective evidence. Appendix to Report shall be filled in for each deficiency being the ground for a ship detention as well as to any deficiency referred by PSC to non-fulfillment of the provisions of the ISM Code and ISPS Code.
- 2) this form is also used for additional audit of the Company pertaining to PSC / FSI ship detention. The actions of the Company in response the deficiencies, identified by PSC / FSI officers shall be checked during this audit.

4.11.2 Where the RS auditor considers that the evidence indicates the presence of a major nonconformity, the major non-conformity shall be documented in the usual way, the Company shall be notified immediately and the auditor shall proceed as indicated in 4.9.2 of the Guidelines.

4.11.3 In the absence of any specific instructions to the contrary, the scope of any additional audit carried out following the detention of a ship that holds an Interim SMC / SMC shall include, as a minimum, the deficiencies identified by PSCO; implementation will be verified to the extent that the available evidence permits.

4.11.4 In cases where the PSCO alleges that there is evidence of a major non-conformity, and the RS auditor considers that there is not, the PSCO, under the authority vested in the officer by the authorities of the port, will decide what further action shall be taken.

4.11.5 If the RS auditor disagrees with the actions taken by the PSCO, the auditor shall provide the PSCO with a written explanation of the disagreement and inform the MA.

Note 20: in such case, the objective evidence of such disputes / main causes of detentions shall be specified.

5 Procedural Requirements for the ISPS Code Certification

5.1 Application⁶¹

5.1.1 This section is based on [PR No. 24](#) – Procedural Requirements for ISPS Code Certification.

Note 21: in order to facilitate usage of the primary source, this Section contains references (in a form of footnotes) to the main requirements of the original English version of PR No. 24. Some of PR No. 24 requirements are completed with the effective RS requirements.

5.2 Criteria for verification⁶²

5.2.1 Criteria for verification of compliance with the requirements of the ISPS Code shall be in accordance with the applicable sections of [Convention](#) Chapter XI-2 and the [ISPS Code](#) Part A.

5.2.2 Only the RS auditors who are qualified as required by [PR No. 10](#) shall carry out ship security verifications.

5.2.3 Stages of verification process:

- 1) review of requests for verification of compliance with ISPS Code;
- 2) planning and carrying out of SSP approvals and ship security verifications;

⁵⁸ Refer to Annex 2 to [PR No. 9](#).

⁵⁹ Refer to Annex 3 to PR No. 9.

⁶⁰ PSCO - Port State Control Officer.

⁶¹ Also refer to "INTRODUCTION" section and 1 "Scope and Application" section of PR No. 24.

⁶² Refer to Section 3 of [PR No. 24](#).

- 3) reporting on the results of SSP approvals and ship security verifications;
- 4) issue of interim ISSC and ISSC.

5.2.4 The entire SSP approval and implementation audit process shall verify:

- 1) that the SSP and any amendments are appropriate to the three security levels defined by the ISPS Code;
- 2) that the SSP is compliant with the ISPS Code;
- 3) that the SSP is being effectively implemented on board.

5.3 Company responsibilities pertaining to security audits⁶³

5.3.1 Where the verification of an SSP shall be carried out by a Classification Society (CS) that did not carry out the SSP approval, the Company shall provide, if requested by the Classification Society, a copy of the SSA report and the SSP prior to the shipboard audit.

5.3.2 The Company shall carry out internal audits and reviews of security activities at least once (1) every twelve (12) months on board each ship.

5.3.3 The Company and the ship are to maintain records of external security verifications for a minimum period of five (5) years.

5.3.4 Any amendments made to the security system, the security equipment or the SSP and that are related to the requirements of [ISPS Code](#) A/9.4.1 to A/9.4.18, must be submitted to the Classification Society for review and approval.

5.3.5 At the initial installation of the SSAS, the Company shall arrange for an approved Radio Technician to test and issue a report on the equipment's compliance with the requirements of Rule XI-2/6.2 - 6.4 of the [Convention](#). SSAS-SC may be tested and a compliance note may be issued by the Ship Security Officer (SSO).

5.3.6 Following the initial installation of the SSAS, the Company is responsible for:

- 1) testing and maintaining the SSAS to satisfy operational requirements according to the approved SSP; and
- 2) maintaining on board the SSAS records specified in the [ISPS Code](#) A/10.1.10.

5.4 The RS responsibilities

5.4.1 RS is responsible for performing the audit and certification process in accordance with [PR No. 24](#) and relevant MA requirements, if any⁶⁴.

5.5. Responsibilities of the RS auditor⁶⁵

5.5.1 The RS auditor is responsible for:

- 1) effective and efficient ship security verification;
- 2) complying with the applicable procedural and regulatory requirements;
- 3) noting in the Report (form 8.4.9) any obstacles to verification of the ship security;
- 4) organizing any special technical assistance required for the verification;
- 5) reporting the audit results clearly, concisely and without undue delay.

5.5.2 The RS auditors shall treat all the information to which they have access during the course of SSP approvals and ship security verification audits in the strictest confidence.

5.6 The audit procedure

5.6.1 Ship Security Plan Approval⁶⁶

5.6.1.1 The Company shall prepare and submit to RS a SSP for each ship. This SSP is to be reviewed and approved by RS on behalf of MA.

5.6.1.2 Unless otherwise specified by MA, all changes to an approved SSP related to the requirements of the [ISPS Code](#) A/9.4.1 to A/9.4.18 shall be reviewed and approved before implementation by the CS that approved the SSP. The SSP and the amendments are to be accompanied by the SSA from which they were developed.

⁶³ Refer to Section 4 of PR No. 24.

⁶⁴ Refer to 11.1 of PR No. 24.

⁶⁵ Refer to 11.2 of [PR No. 24](#).

⁶⁶ Refer to 5.1-5.8 of PR No. 24.

5.6.1.3 The SSP shall be developed in accordance with the requirements of Part A of the [ISPS Code](#) taking into account ISPS Code B/8.1 to B/13.8, and shall be written in the working language, or working languages, of the ship. If the language, or languages, used is not English, French or Spanish, a translation into one of these languages shall be included. The RS auditor undertaking the approval shall consider at least the version of the SSP written in English, French or Spanish.

5.6.1.4 When reviewing and approving a SSP, the RS auditor shall verify that the Company has taken into account relevant security-related guidance and best management practices, including the latest IMO Circulars concerning piracy, hijacking and armed robbery.

5.6.1.5 When RS approves SSP and any amendments it should retain, as a minimum, a copy of the Letter of SSP approval (refer to 5.9.4.6). The approved SSP and reports which certify its approval shall be kept on board the ship.

5.6.1.6 RS that approves an amendment to an SSP shall determine whether any additional verification is required relating to its implementation.

Note 22: for example, new security equipment, specified in SSP, is not yet installed / ready for operation. The agreed time period for submission of the ship to the assigned AA shall not exceed three (3) months from the date the audit was completed.

5.6.1.7 In course of ISPS Code certification RS is not entitled to approve amendments to SSP that is approved by other Classification Society or MA. If the ISPS Code certification is transferred in accordance with [PR No. 18](#) and if the gaining Society is requested to approve any amendments to the SSP by the management company, the gaining Society shall re-approve the entire SSP.

5.6.1.8 Evidence should be sought that the Company Security Officer (CSO) has received training in accordance with [ISPS Code](#) A/13.1. If evidence is not provided by the Company or if there is objective evidence that the CSO has not received such training, the RS auditor should inform the Company about necessity to implement the relevant corrective actions.

5.6.1.9 RS reviews SSP submitted in electronic as well as in paper copies. If the review result is positive (no observations / failures found) SSP may be approved.

The approval note is made on the paper copy of SSP. Approval notes are made as follows:

- 1) the title page of SSP shall be stamped as "APPROVED by RS under the authority of MA" with a signature of the Lead Auditor and the RS auditor stamp;
- 2) all the rest pages of the SSP approved / approved amendments to the SSP shall only be stamped with RS auditor's seal.

5.6.1.10 Upon approval of SSP the Lead Auditor shall issue a Letter of the Ship Security Plan Approval (PAL) (form 8.4.7).

5.6.2 Interim verification for the issue of an Interim ISSC for a ship

5.6.2.1 The procedure of issue and drawing up of an Interim ISSC is specified in Section 19.4, Part A of the [ISPS Code](#).

5.6.2.2 An Interim ISSC may be issued in the following cases⁶⁷:

- 1) a ship without a certificate, on delivery or prior to its entry or re-entry into service;
- 2) transfer of a ship under the flag of one MA from the flag of other MA;
- 3) transfer of a ship to the flag of a Contracting Government from a State which is not a Contracting Government; or
- 4) when a Company assumes the responsibility for the operation of a ship not previously operated by that Company.

5.6.2.3 Interim ISSC shall only be issued when the MA or RSO, on behalf of the MA has verified that⁶⁸:

- 1) ship security verification, required by Section 8, Part A of the [ISPS Code](#), is completed;
- 2) a copy of SSP meeting the requirements of Chapter XI-2 and a part A of the [ISPS Code](#) is provided on board, has been submitted for review and approval, and is being implemented on the ship;

⁶⁷ Refer to 19.4.1 of the ISPS Code.

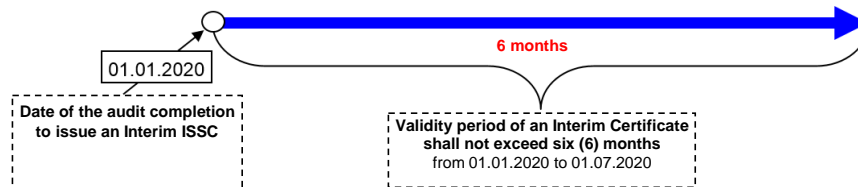
⁶⁸ Refer to 19.4.2 of the [ISPS Code](#).

3) the ship is provided with SSAS meeting the requirements of regulation XI-2/6, if required.

5.6.2.4 Upon the results of verification for issue of an Interim ISSC to the ship and certification of that the requirements of Section A/19.4.2 of the [ISPS Code](#) are fulfilled, RS can issue one of the following forms of the Interim ISSC (refer to 5.7.2):

- 1) Interim ISSC on the RS blank form (form 8.4.4);
- 2) Interim ISSC on a blank form of the appropriate MA;
- 3) Interim ISSC on the RS blank form for the ships which are not covered by the provisions of the Convention (form 8.4.4-2).

5.6.2.5 Example of general structural diagram of audit to issue Interim ISSC:



5.6.2.6 The interim ISSC shall be valid for (6) months or till the date of the certificate (ISSC), provided by Section 19.2 of the [ISPS Code](#) is issued, depending on which date comes earlier, and shall not be extended (refer to 19.4.4, Part A of the ISPS Code).

5.6.2.7 The copy of Interim ISSC shall be available in the Company Head Office.

5.6.3 Initial verification for issue of ISSC to a ship

5.6.3.1 Provisions as regards ship security audits and ISSC issuance are specified in 19.1, Part A of the [ISPS Code](#).

5.6.3.2 Provisions as regards ISSC issuance and endorsement are specified in 19.2, Part A of the ISPS Code.

5.6.3.3 ISSC shall be issued after initial or renewal audit in accordance with 5.8.1 of the Guidelines.⁶⁹

5.6.3.4 The "type of ship" to be entered on the ISSC shall be selected from those defined in Chapter IX-2/1 of the [Convention](#)⁷⁰.

5.6.3.5 Upon the results of verification for issue of ISSC to the ship and verification of that:

- 1) the security system and all the equipment related to the ship security has been checked in compliance with Section 19.1, Part A of [ISPS Code](#);
- 2) the security system and all the equipment related to the ship security is in every sense in satisfactory condition and that the ship complies with the applicable requirements of Chapter XI-2 of SOLAS-74 Convention and Part A of the ISPS Code;
- 3) an approved SSP is available on the ship;

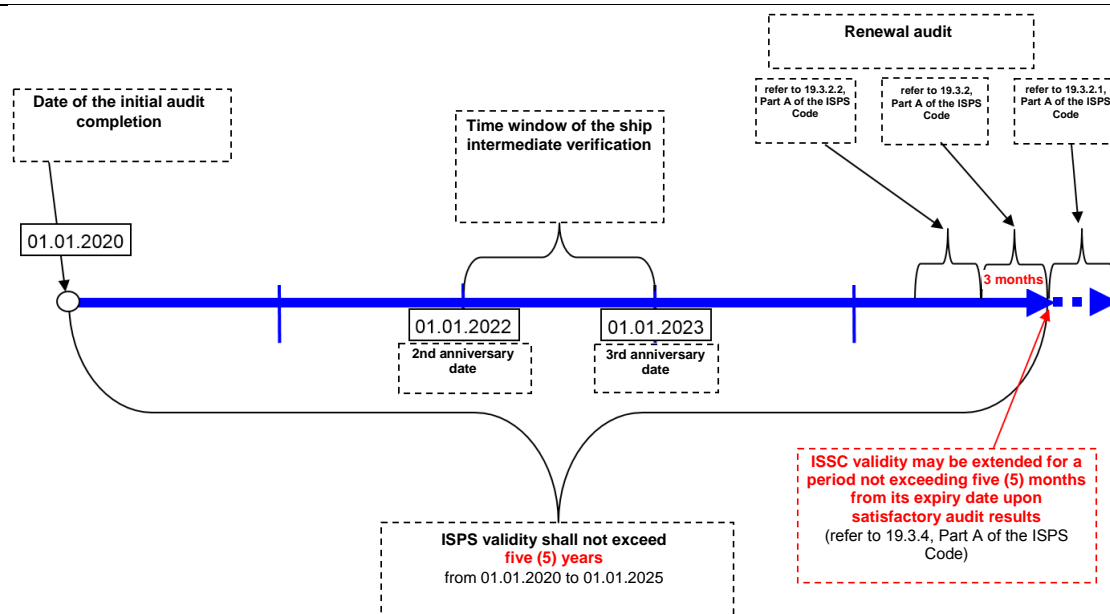
RS can issue one of the following ISSC forms (refer to 5.7.2):

- 1) ISSC on the RS blank form (form 8.4.3);
- 2) ISSC on a blank form of the appropriate MA;
- 3) ISSC on the RS blank form for the ships which are not covered by the provisions of the Convention (form 8.4.3-2).

5.6.3.6 Example of general structural diagram of audit to issue ISSC:

⁶⁹ Refer to 8.1 of PR No. 24.

⁷⁰ Refer to 8.2 of [PR No. 24](#).



5.6.3.7 International Ship Security Certificate (ISSC) shall be issued for a period specified by the MA which shall not exceed five (5) years (refer to 19.3, Part A of the [ISPS Code](#)).

ISSC with a shorter validity period can be issued by the RS auditor, if, in compliance with an agreement between RS and MA, the Flag Administration issues an ISSC for a period not exceeding five (5) years itself⁷¹. In this case, unless otherwise specified by MA, SMC with a validity period not exceeding five (5) months can be issued by the RS auditor.

5.6.3.8 The copy of ISSC (with endorsement note, if applicable) shall be available in the Company Head Office.

5.6.4 Intermediate verification and renewal of ISSC

5.6.4.1 The ISSC shall be endorsed at the intermediate audit and at any additional audit required by the MA⁷².

5.6.4.2 Intermediate audit shall be performed between the second and third dates of ISSC anniversary dates (refer to 19.1.1.3, Part A of the [ISPS Code](#)).

5.6.4.3 Renewal audit shall be performed in time periods set by the Administration but not exceeding five (5) years except for cases where Section 19.3, Part A of the ISPS Code is applied (refer to 19.1.1.2, Part A of the ISPS Code).

5.6.4.4 If renewal audit is completed more than three (3) months before the expiry date of the existing ISSC, the new ISSC shall be valid for a period not exceeding five (5) years from the date of completion of the renewal audit (refer to 19.3.2.2, Part A of the ISPS Code).

5.6.4.5 If the renewal audit is completed within three (3) months prior to expiry date of the existing ISSC, the new ISSC shall be valid from the date of completion of the renewal audit till the date, not exceeding five (5) years from the expiry date of the existing ISSC (i.e. shall have the same anniversary date, refer to 19.3.2, Part A of the ISPS Code).

5.6.4.6 If renewal audit is completed after the expiry date of the existing ISSC, the new ISSC shall be valid from the date of completion of the renewal audit for a period not exceeding five (5) years from the expiry date of the existing ISSC (refer to 19.3.2.1, Part A of the ISPS Code).

5.6.4.7 If validity of the ISSC is extended in accordance with 19.3.5, Part A of the ISPS Code, documentary evidence of Administration approval must be sighted by the Classification Society⁷³.

⁷¹ Refer to 8.4 of PR No. 24.

⁷² Refer to 8.3 of [PR No. 24](#).

⁷³ Refer to 8.5 of PR No. 24.

5.6.4.8 At the request of the Company, the ISSC expiry date may be aligned with the SMC expiry date, provided that it does not exceed five (5) year period specified in 19.3, Part A of the ISPS Code (refer to Appendix 6 to the Guidelines)⁷⁴.

5.6.5 Issue of a new ISSC after withdrawal⁷⁵

5.6.5.1 An Interim ISSC shall not be issued to a ship from which a full-term ISSC has been withdrawn.

5.6.5.2 When an ISSC has been withdrawn, a new certificate may be issued only after the successful completion of an initial audit.

5.6.5.3 The new ISSC shall have the same expiry date as ISSC that was withdrawn.

5.7 Preparation for audit**5.7.1 ISPS Code request**

5.7.1.1 RS has developed the following request forms for the provision of ISPS certification services posted at the [RS website](#):

- 1) form 8.4.5 – Request for SSP Approval / ship security verification;
- 2) form 8.4.6 – Questionnaire on conformity between Ship Security Plan (SSP) and ISPS Code requirements (completed by the Company and sent to the RS Branch Office attached to the Request, when it is necessary to carry out SSP approval or amendments thereto).

5.7.1.2 The Company shall use the valid request form for sending to the RS Branch Office. Responsibility of the Company to receive the service regarding the ISPS Code is set on the second page of form 8.4.5. Also refer to 5.3.

5.7.1.3 The RS Branch Office that received the request shall review the request in compliance with the RS requirements and determine the possibility of rendering the appropriate service.

5.7.2 ISPS Code documents

5.7.2.1 Requirements for ISPS forms are provided in [Appendixes 1 and 2 to Part A of the ISPS Code](#).

5.7.2.2 [PR No. 24](#) contains requirements to the following records:

- 1) Report on the SSP approval / ship security verification and issue of PAL (refer to Section 10);
- 2) Failure Report (refer to Section 7);
- 3) Notification of Invalidation of ISSC Certification (refer to Annex 3).

Note 23:

- the ISPS Code document forms developed by RS comply with the above mentioned requirements;
- the procedure for issuing and application of ISPS Code document forms, developed by RS, is described in the correspondent instructions thereto.

5.7.3 Verification of compliance with Flag State requirements

5.7.3.1 If not stated otherwise in the MA additional requirements / instructions, the RS auditors shall check compliance with the additional MA requirements in the same manner, as compliance with the other obligatory requirements.

5.7.3.2 Check-lists of MA additional requirements are developed by RS for these purposes.

5.8 ISPS Code Audit of Ships**5.8.1 Opening meeting**

5.8.1.1 Shipboard verification audits shall start with an opening meeting, the purpose of which is to⁷⁶:

- 1) introduce the RS auditor(s) to the ship's management;
- 2) explain the scope and purpose of the audit;
- 3) provide a short summary of the methods and procedures to be used;
- 4) establish the official communication line between the auditor and the shipboard management;

⁷⁴ Refer to 8.6 of PR No. 24.

⁷⁵ Refer to Section 12 of [PR No. 24](#).

⁷⁶ Refer to Section 9.1 of PR No. 24.

- 5) confirm that the necessary resources, documentation and facilities are available;
- 6) confirm the time and date of the closing meeting and any interim meetings.

5.8.2 Checking of compliance with the ISPS Code requirements

5.8.2.1 Audits for the issue or renewal of ISSCs shall consist of the following steps⁷⁷:

- 1) verification that an approved SSP is on board;
- 2) verification through a representative sample that the security system is being implemented effectively;
- 3) verification that all security equipment specified in the SSP complies with applicable requirements;
- 4) verification that all security equipment specified in the SSP, including the ship security alert system (SSAS), is operational.

5.8.2.2 In order to facilitate verification of compliance with additional MA requirements during SSP approval / ship security audit the RS has developed the Check-lists of MA additional requirements.

5.8.2.3 Initial, intermediate and renewal audits shall be performed only under normal operating conditions and when the ship is fully manned in accordance with the Safe Manning Certificate⁷⁸.

5.8.2.4 Intermediate and renewal audits shall include a review of failures reported following previous audits. The auditor shall select a sample(s) of the reported failures and verify that the company is investigating, analyzing and resolving them effectively and in a timely manner⁷⁹.

5.8.2.5 In relation to the approved corrective actions for each failure, issued by RS upon the results of the previous ship security verification (refer to 5.9.1.5), the RS auditor shall check the following:

- 1) actual implementation of the approved corrective actions for each failure;
- 2) the dates of the corrective actions are met;
- 3) objective evidence of corrective actions implementation is presented;

In relation to the observations, reported by RS upon the results of the previous ship security audit, the RS auditor shall check availability of preventive actions, taken by the Company / the ship pertaining to each reported observation with regard to the following:

- 1) objective evidence of preventive actions is presented;
- 2) the dates of the preventive actions are met;
- 3) absence of preventive actions in justified cases;
- 4) the observation has led / has not led to a failure;

The results of the abovementioned check shall be specified in the Report (form 8.4.9) and in every Failure Report / Observation Report (form 8.4.8).

5.8.2.6 The RS auditor shall verify the effective implementation of the approved SSP and its documented procedures based on objective evidence obtained by interviews, inspections, review of documents and examination of records⁸⁰.

5.8.2.7 Following the initial installation of the SSAS, RS may approve the related provisions in the SSP and verify, by audit and the witnessing of a complete security alert test, the effective implementation of those provisions. Confirmation that the SSAS complies with the requirements of paragraphs 2 – 4 of XI-2/6 of the [Convention](#) will be found in the Radio Technician's report (or the SSO's report, in the case SSAS-SC is used)⁸¹.

5.8.2.8 At each subsequent scheduled audit the RS auditor shall examine the records of the testing of the SSAS, identify the SSAS activation points and verify the effective implementation of the procedures, instructions and guidance relating to the SSAS as specified in [ISPS Code](#) A/9.4.18⁸².

5.8.2.9 The RS auditor has the authority to ask for information from any other Classification society or, if relevant MA, in order to check the accuracy of the information provided by the Company⁸³.

⁷⁷ Refer to 6.1 of PR No. 24.

⁷⁸ Refer to 6.2 of [PR No. 24](#).

⁷⁹ Refer to 6.6 of PR No. 24.

⁸⁰ Refer to 6.3 of PR No. 24.

⁸¹ Refer to 6.4 of PR No. 24.

⁸² Refer to 6.5 of PR No. 24.

⁸³ Refer to 6.7 of PR No. 24.

5.8.2.10 Where the audit of a ship shall be carried out by a CS that did not carry out the SSP approval, the Classification Society may review the SSP either at, or prior to, the audit on board⁸⁴.

5.8.3 Closing meeting

5.8.3.1 At the end of the Audit, the RS auditor shall hold a meeting with the senior management of the ship and those responsible for the functions concerned. The purpose is to present major failures, failures and observations to the ship's management in such a manner that they are clearly understood⁸⁵.

5.8.3.2 The Lead Auditor during the closing meeting shall also inform the Company / ship representatives about the following:

- 1) in relation to the reported observations it shall be noted about the potential ship security failure, which, if not corrected, may later lead to a failure. To avoid such a situation, it is practicable that the Company / ship representatives shall develop and undertake preventive actions based on documented observations (refer to 5.9.3.3).
- 2) the Company's actions regarding the documented observations / failures / major failures as well as submission of a request for the additional ship security audit to RS, if such audit is assigned by RS for evaluating the effectiveness of the corrective actions taken by the Company / ship in order to verify the ISSC (including the Interim ISSC) validity, refer to 5.9.1.5 - 5.9.2.

5.9 Presentation of audit results

Note 24: this section lists general requirements for presentation / development of corrective actions for failures, including major failures.

5.9.1 Failures

5.9.1.1 Audit findings shall be reviewed by the auditor(s) in order to determine whether they shall be reported as major failures, failures or observations in Failure Report / Observation Report (form 8.4.8)⁸⁶.

5.9.1.2 The Failure Report (FR, form 8.4.8) shall state clearly the act or situation identified as non-compliance with the ship security.

5.9.1.3 The content of the failure shall be full and clear, as well as made in easily understandable form.

Note 25: the wording of the failure shall refer to non-compliances with the ISPS Code requirements.

5.9.1.4 Failures shall be raised against the corresponding requirements of the ISPS Code, the relevant sections or paragraphs of the SSP and any specific MA requirements⁸⁷.

5.9.1.5 The Company is responsible for developing and implementing corrective actions of each failure, reported by the RS auditor, including actions to eliminate the failure (see paras 5.9.1.7, 5.9.1.8, 5.9.2.1 and 5.9.2.2) and to prevent recurrence. The corrective actions shall be agreed between the Company and the Lead RS Auditor. The agreed time period for implementation of actions to prevent the recurrence (elimination of the failure in the case of application of paras 5.9.1.8) shall not exceed three (3) months from the date the audit was completed. The implementation of these actions shall be verified (refer to 5.8.2.5) not later than the next ship security audit, which shall be performed upon expiry of the time period, agreed for implementation of these actions.

The Company is also responsible for notifying the RS Branch Office, which performed the audit, on the actual implementation of the corrective actions for each failure within no later than three (3) months from the date the audit was completed.

Note 26: the Company's procedure for dealing with failures is given in FR (form 8.4.8).

5.9.1.6 Depending on the nature of any failures identified (see paras 5.9.1.7, 5.9.1.8, 5.9.2.1 and 5.9.2.2), to verify the implementation of actions to prevent the recurrence (to eliminate the failure if paras 5.9.1.8 are applied), additional ship security audit (AA) might be required for verification of the corrective actions to prevent recurrence of the failure / major failure / to eliminate the failure (if applicable, refer to 5.9.1.8). The Company is responsible for applying to RS for

⁸⁴ Refer to 6.8 of PR No. 24.

⁸⁵ Refer to 7.2 of [PR No. 24](#).

⁸⁶ Refer to 7.1 of PR No. 24.

⁸⁷ Refer to 7.3 of PR No. 24.

any follow-up AA audit required by the RS auditor. The agreed time period for submission of the ship to the assigned AA shall not exceed three (3) months from the date the audit was completed.

5.9.1.7 An ISSC shall not be issued or renewed until compliance has been restored for all identified failures. In addition, a schedule (refer to 5.9.1.6) for the implementation of action to prevent recurrence may be agreed between the Company and the RS auditor. AA may be carried out as necessary⁸⁸.

5.9.1.8 An ISSC may be endorsed following identification of a failure, provided that compliance has been restored or a schedule (refer to 5.9.1.5) has been agreed between the Company and the RS auditor for the completion of corrective action to restore compliance and to prevent recurrence. AA may be carried out as necessary⁸⁹.

5.9.1.9 Nonfulfillment the agreed corrective actions (refer to 5.9.1.5), as well as not submitting the ship for the assigned AA (refer to 5.9.1.6) shall be treated as grounds for invalidation of the ISSC (including the Interim ISSC).

5.9.2 Major failures⁹⁰

5.9.2.1 ISSC shall not be issued or renewed if a major failure (MF) exists. Immediate action is required to restore compliance. The RS auditor shall verify the implementation of these measures before the ship sails and a schedule (refer to 5.9.1.6) for the implementation of actions to prevent recurrence shall be agreed between the Company and the RS auditor. At least one AA shall be carried out within the period agreed for the verification of implementation of the actions to prevent recurrence.

5.9.2.2 ISSC shall not be endorsed if a MF exists. Immediate action is required to restore compliance, thereby permitting the MF to be downgraded. The RS auditor shall verify the implementation of these measures before the ship sails and a schedule (refer to 5.9.1.5) for the implementation of actions to prevent recurrence shall be agreed between the Company and the RS auditor. At least one AA shall be carried out within the period agreed for the verification of implementation of the actions to prevent recurrence (refer to 5.9.1.6).

Note 27: the RS Lead Auditor may downgrade MF only after checking that the Company / ship perform the following actions:

- verifiable actions have been taken to restore compliance with the requirements;
- actions to restore compliance with the requirements have been completed prior to sailing;
- effectiveness of these actions is confirmed by objective evidence (for example, copies of documents, amendments to SSP documents, photos, etc.).

MF downgrading actions shall be recorded in FR (form 8.4.8) with the necessary evidence attached.

5.9.2.3 In relation to actions of the RS auditor during reporting of a major failure and notifying RHO / MA thereof, refer to Appendix 5 to the Guidelines.

5.9.2.4 Nonfulfillment the agreed corrective actions, as well as not submitting the ship for the assigned AA shall be treated as grounds for invalidation of the ISSC (including the Interim ISSC).

5.9.3 Observations

5.9.3.1 Observation Report (form 8.4.8) shall clearly state the fact, confirmed by objective evidence, identified as a potential failure in ship security, which, if not corrected, may lead to failure in the future (refer to 5.8.3.2.1).

5.9.3.2 The content of the observation shall be full and clear, as well as made in easily understandable form. If the observation relates to SSP / requirements the ISPS Code / MA, the relevant references shall be specified in the Observation Report.

5.9.3.3 The agreed time period for implementation of preventive actions pertaining to an observation shall not exceed three (3) months from the date the audit was completed. The effectiveness of these actions shall be verified not later than the next ship security verification, which shall be performed upon expiry of the time period, agreed for implementation of preventive actions (refer to 5.8.2.5).

5.9.4 Report on the SSP approval / ship security verification

5.9.4.1 A Report (form 8.4.9) shall be issued after every SSP approval and ship security verification⁹¹.

⁸⁸ Refer to 7.5 of PR No. 24.

⁸⁹ Refer to 7.7 of [PR No. 24](#).

⁹⁰ Refer to 7.4, 7.6 of PR No. 24.

⁹¹ Refer to 10.1 of PR No. 24.

5.9.4.2 In the case of an audit, the Report shall include the following⁹²:

- 1) date and time of completion of the audit;
- 2) status of the SSP implementation;
- 3) confirmation of the operational status of all security equipment and systems on board;
- 4) reports of any failures found during the audit.

Note 28: any additional information related to security verification may be indicated in the Report upon the RS auditor's decision.

5.9.4.3 Upon the results of SSP review the RS auditor shall issue the following records:

- 1) Ship security plan approval report (form 8.4.9);
- 2) Ship security plan approval letter (form 8.4.7);
- 3) FR(s) / Observation Report(s) (form 8.4.8), if applicable.

5.9.4.4 Upon the results of ship security verification review the RS auditor shall issue the following records:

- 1) Report on the ship security verification (form 8.4.9);
and also, if applicable:
2) relevant ISSCs;
- 3) FR(s) / Observation Report(s) (form 8.4.8);
- 4) Check-lists of MA additional requirements (forms 8.4.6-2-A).

5.9.4.5 PAL shall be given to the Company and retained on board the ship, together with a copy of the Report (form 8.4.9)⁹³.

Originals of the records specified in 5.9.4.3 - 5.9.4.4, except for Check-lists of additional requirements of Flag Administration shall be submitted by the RS Lead Auditor to the Company / ship representatives upon completion of the audit.

5.9.4.6 The other documents, which shall be attached to the Report (form 8.4.9) (Audit materials), if applicable, are copies of the following documents:

- 1) When reviewing SSP / amendments to SSP:
 - title page of the approved SSP;
 - contents page of the approved SSP;
 - approved revision page of SSP;
 - FRs, issued upon the results of the previous review of SSP / amendments to SSP, closed out by the RS auditor.
- 2) When performing ship security verification:
 - FRs / Observation Reports, issued upon the results of the previous ship security audit, closed out by the RS auditor;
 - title page of the approved SSP;
 - security equipment installation layouts (if applicable);
 - existing ISSC with endorsement notes;
 - crew list;
 - objective evidence of the Company actions for downgrading of MF (e.g., copies of documents, amendments to SSP, photos etc.);
 - MA authorization to perform an audit / extension of documents / other MA instructions.
 - as well as copies of any other documents which confirm the results of the audit as determined by the RS auditor.

⁹² Refer to 10.4 of [PR No. 24](#).

⁹³ Refer to 10.3 of PR No. 24.

5.10 Communications with flag states and between ROs. Notification of Invalidation of ISSC Certification⁹⁴

5.10.1 In case of invalidation of the ISSC, the MA and RO must be informed not later than 5 working days from the date of invalidation. The procedure for informing is specified in the instructions to form 8.4.22 "Notification on Invalidation of ISPS Certification (ISSC)".

5.11 Actions Following Port State Control Detentions (PSC)⁹⁵

5.11.1 When a ship is detained and failures relating to the ISPS Code are given as reasons for the detention, the CS that issued the ISSC shall carry out an additional audit.

5.11.2 Any failures shall be dealt with in accordance with the relevant requirements of 5.9 of the Guidelines.

5.11.3 If the RS auditor disagrees with the PSCO conclusions⁹⁶, the reasons for the disagreement shall be documented in the Report (8.4.9). PSCO, the Company and MA must be made aware of the auditor's comments in this respect.

Note 29: in such case, the objective evidence of such disputes / main causes of detentions shall be specified.

Appendix 1. Company certification scenarios⁹⁷

Note 30: These scenarios may be subject to Flag State requirements and shall only be applied in the absence of any instructions from MA.

	Scenario	Type of audit	Minimum scope of audit	Carried out by:	Certificate issued
1	Change of Company name and/or address	Verification on site	<ul style="list-style-type: none"> - Verify that Company organization and responsibilities remain essentially unchanged. - Ensure that necessary changes have been made to SMS documentation. - Verify that changes have been reported to MA to update the CSR⁹⁸ for each vessel. 	Auditor	Reissue DOC and SMCs with new name and/or address (expiry date as previous certificates) ⁹⁹ .
2	Change to RO from a Classification Society not holding a QSCS certificate	Initial audit	<ul style="list-style-type: none"> - Audit to address all elements of the ISM Code. - All corrective actions to be verified and previous NCRs to be closed out by the GS. 	Auditor	<u>DOC with validity not exceeding 5 years from audit completion date</u> DOC (valid 5 years from date of audit).
3	Additional ship type on DOC	Interim audit on site	<ul style="list-style-type: none"> - Review of changes to SMS in relation to new ship type / to accommodate new ship type. - Review plans to implement changes to SMS (minimum of 1 ship required). 	Auditor	Interim DOC for new ship type.

⁹⁴ Refer to Annex 3 to [PR No. 24](#).

⁹⁵ Refer to 13.1 – 13.3 of PR No. 24.

⁹⁶ PSCO - Port State Control Officer.

⁹⁷ Refer to Annex 5 to [PR No. 9](#).

⁹⁸ Continuous Synopsis Record.

⁹⁹ A SMC is reissued simultaneously with a DOC (expiry date as previous SMC). ISSC (expiry date as previous ISSC) may be reissued simultaneously with the DOC and SMC only if the SSP was not approved by RS and the evidence of the SSP approval was submitted by the RO, which carried out its approval.

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	Scenario	Type of audit	Minimum scope of audit	Carried out by:	Certificate issued
4.	Change from Interim DOC to full DOC in Scenario 3	Additional audit on site	- Verify additional requirements for ship type have been implemented. - Review results of internal audit.	Auditor	DOC (expiry date as for existing ship type).
5	Minor change to SMS	Verification at next audit	- Assess potential impact on SMS when advised and decide whether visit is required.	Auditor	No action.
6	Major change to SMS¹⁰⁰	Verification on site	- Verify changes are appropriate and adequate for new circumstances.	Auditor	No action.
7	Additional flag	Additional audit on site	- Verify availability of MA instructions and their incorporation into the management system.	Auditor	DOC with same expiry date as the DOC issued on behalf of the other Flag State(s) ¹⁰¹ .

Appendix 2. Ship certification scenarios¹⁰²

Note 31: These scenarios may be subject to Flag State requirements and shall only be applied in the absence of any instructions from MA.

	Scenario	Carried out by:	Action required	Scope of Audit and certification
1	Change of ship's name	Surveyor or auditor	Verification on board	1. Verify correct ship's name on all Certificates and Documents. 2. Amend / reissue SMC with the new ship's name, as appropriate. <u>Note:</u> SMC must be amended by the RS Branch Office, which issued the certificate, or by special arrangement ¹⁰³ . Reissued SMC shall have the same expiry date as the SMC valid for the moment of reissue.
2	Change of flag	Auditor	Interim audit on board	1. Interim audit as required in accordance by ISM Code, 14.4. 2. Issue Interim SMC.
3	Change in IMO ship type	Auditor	Interim audit on board	1. Interim audit as required by ISM Code, 14.4. 2. Issue Interim SMC with the new ship type.
4	Adding IMO ship type (e.g. from bulk carrier to oil tanker)	Auditor	Interim audit on board	1. Interim audit as required by ISM Code, 14.4. 2. Issue Interim SMC with the both ship types.

¹⁰⁰ This can include significant restructuring of SMS (for example, creation of branch offices).

¹⁰¹ An audit for the issue of an Interim DOC shall be carried out upon special ISM requirements of MA.

¹⁰² Refer to Annex 6 to [PR No. 9](#).

¹⁰³ The RS may with permission from MA authorize a surveyor of CS which classed the ship, to amend SMC issued by RS.

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	Scenario	Carried out by:	Action required	Scope of Audit and certification
5	Change of ship type, dual to single (e.g. OBO ¹⁰⁴ to oil tanker)	Surveyor or auditor	Verification on board	1. Evidence of surrender of SOLAS-74 or MARPOL-73 related certificates for the original ship type (e.g. surrender of the International Oil Pollution Prevention Certificate (IOPP Certificate) with Supplement B when going from OBO to bulk carrier on permanent basis). 2. Amend / issue replacement SMC with appropriate ship type and same expiry date as the current SMC. <u>Note:</u> SMC must be amended by the RS Branch Office, which issued the certificate, or by special arrangement ¹⁰² .
6	Change to RO from a Classification Society not holding a QSCS certificate	Auditor	Initial audit on board ¹⁰⁵	1. Audit to address all elements of ISM Code. 2. Issue SMC.
7	Ship out of service between 3 and 6 months ¹⁰⁶	Auditor	Additional audit if required by the Flag State	Endorse SMC, as appropriate.
8	Ship out of service more than 6 months ¹⁰⁵	Auditor	Interim audit on board	1. Interim verification. 2. Issue Interim SMC.
9	Intermediate audits requested after the end of the audit time window	Auditor	Intermediate audit on board	1. MNC raised that may be downgraded based on completion of audit. 2. Additional audit within three (3) months required. 3. If reinstated, SMC to be endorsed with a statement (e.g. Validity reinstated with scope as initial). If re-issued, SMC to have same expiry date as previous certificate ¹⁰⁷ .
10	Change of Company name and/or address		Attendance on board not required	1. Verify DOC has been reissued with new Company name and address. 2. Reissue SMC with the new Company name and address.

¹⁰⁴OBO – oil tanker / bulk carrier.

¹⁰⁵ Ships with Interim SMC, and which SMS are not yet ready for initial audit, shall be issued with an Interim SMC with same period of validity as the certificate issued by the losing RO. The auditor shall take into account that there may not yet be records for all activities related to the SMS implementation on such ships.

¹⁰⁶ These instructions do not apply to ships for which seasonal lay-ups are a normal part of their operational routine (refer to [IMO MSC-MEPC.7/Circ.9](#)).

¹⁰⁷ Entry shall be made on the SMC second page in the blank space of field "Intermediate audit".

Appendix 3. Ship security certification scenarios

1 ISPS Code Certification Scenarios – Minimum Requirements¹⁰⁸

Note 32: the above scenarios apply in the absence of any MA requirements to the contrary.

	Scenario	Condition	Action required	Ship Security Plan	Scope of Audit and Certification
1	Change of ship's name	Conducted by a surveyor or an auditor	Verification on board	1. Verify correct ship's name on the title page, index page and revision page of SSP. 2. SSP Approval Letter with the ship's new name.	1. Verify correct ship's name on all Certificates and Documents. 2. Verify, that SSAS is has been reprogrammed with the ship's new name. 3. Amend ISSC in relation to the name of the ship / reissue ISSC with the new name of the ship. <u>Note:</u> ISSC must be amended by issuing organization or by special arrangement ¹⁰⁹ . Reissued ISSC shall have the same expiry date as the current ISSC.
2	Change of flag	Conducted by an auditor	Interim audit on board	1. Check that the SSP is on board. 2. Check that SSP addresses ISPS Code A/9.4.1 to A/9.4.18. 3. Check that a copy of the SSP has been submitted to MA or CS for approval.	1. Interim verification as required by ISPS Code A/19.4.2 (refer to 5.6.2). 2. Issue Interim ISSC.
		When SSP has already been approved for a new flag Conducted by an auditor	Additional audit on board	---	1. Verify compliance with the requirements of the SSP and reprogramming of SSAS. 2. Issue a replacement ISSC with same expiry date as the current ISSC.
3	Change in IMO ship type	Conducted by an auditor	Interim audit on board	Verify amendments to SSP, if any, have been submitted for approval.	1. Interim verification as required by ISPS Code A/19.4.2 (refer to 5.6.2). 2. Issue Interim ISSC with new ship type.
4.	Takeover of certification from an organization not holding a QSCS certificate	Conducted by an auditor	Initial audit on board		1. Audit to address all elements of ISPS Code. 2. Issue ISSC.
5	Ship out of service between 3 and 6 months¹¹⁰	Conducted by an auditor	Additional audit, when required by the MA		Endorse ISSC, as appropriate.
6	Ship out of service more than 6 months out of service¹⁰⁹	Conducted by an auditor	Interim audit on board		1. Interim verification as required by ISPS Code A/19.4.2 (refer to 5.6.2). 2. Issue Interim ISSC.

¹⁰⁸ Refer to Annex 1 to [PR No. 24](#).

¹⁰⁹The RS may with permission from MA authorize a surveyor of CS which classed the ship, to amend ISSC issued by RS.

¹¹⁰ These scenarios do not apply to ships for which seasonal lay-ups are a normal part of their operational routine (refer to [IMO MSC-MEPC.7/Circ.9](#)).

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Guidelines on Certification of the Safety Management Systems in Compliance with the Requirements of the ISM Code and of the Ships in Compliance with the Requirements of the ISPS Code

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7	Intermediate audits requested after the end of the audit time window	Conducted by an auditor	Intermediate audit on board		1. If reinstated, ISSC to be endorsed with a statement (e.g. Validity reinstated with scope as initial) ¹¹¹ . If re-issued, ISSC to have same expiry date as previous certificate. 2. Issue PR17 report if ISM audit is not held at the same time.
8	Change of Company name and/or address	---	Attendance on board not required	1. Approve SSP amendments to reflect new Company name and address. 2. Reissue PAL.	1. Verify DOC has been reissued with new Company name and address. 2. Issue replacement ISSC with same expiry date as previous ISSC ¹¹² .

2 Application of the ISPS Code to FPSOs and FSUs¹¹³

2.1 Refer to IMO Circular [MSC-MEPC.2/Circ.9](#) of 25 May 2010 "Guidance for the Application of Safety, Security AND Environmental Protection Provisions to FPSOs and FSUs".

Appendix 4. Determination of ship types to be listed on DOCs and SMCs¹¹⁴

- 1) The ship types listed on DOCs and SMCs shall be consistent with the specific ship types defined in [SOLAS IX Regulation 1](#) ~~the Convention~~ and on pertinent [SOLAS Convention](#) documentation aboard ship.
- 2) Some ships are designed for use in multiple services (for example Oil Tanker/Chemical Tanker). The ship type(s) listed on the DOC and SMC shall reflect the service(s) in which the ship is fit to serve, and the safety management system shall include appropriate procedures for these ship types.

¹¹¹ Entry shall be made on the ISSC second page in the blank space of field "Intermediate audit".

¹¹² If SSP has been approved by RS, then approval of amendments to SSP is carried out on an individual request after that ISSCs are issued for replacement according to scenario.

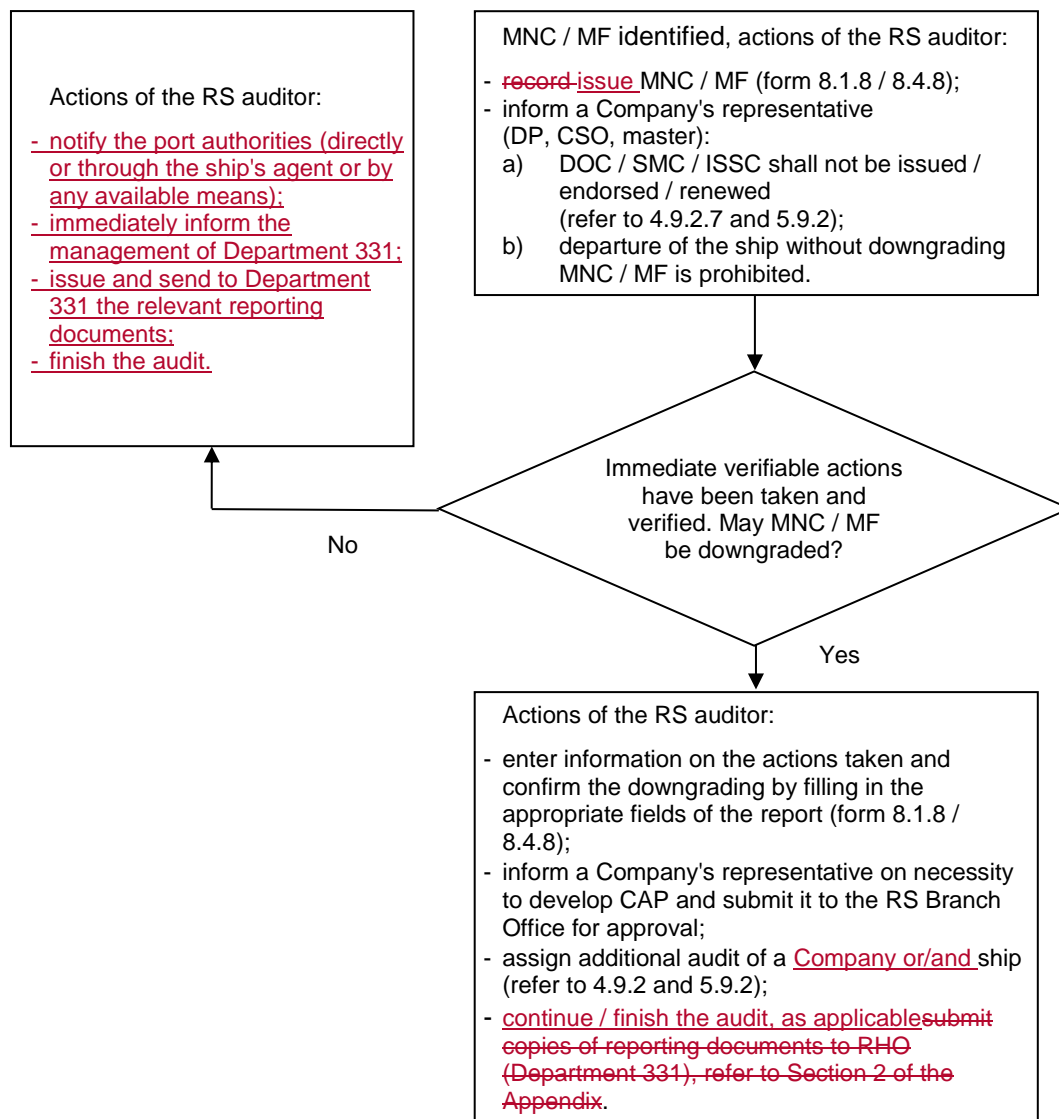
¹¹³ Refer to Annex 2 to [PR No. 24](#).

¹¹⁴ Refer to Annex 4 to [PR No. 9](#).

Appendix 5. Procedure for actions of the RS auditor when reporting of major non-conformity / failure (MNC / MF).

Notification of RHO / MA

1. Procedure for reporting of MNC / MF by the RS auditor



Appendix 6. Aligning the expiry dates of SMC, ISSC and MLS

Note 33: this Section of the Guidelines specifies the main provisions of Annex 5 to [IACS Recommendation No. 41](#) in respect of aligning of SMC, ISSC and MLS validity periods upon the Company's request.

1.1 When the Company requests RS to conduct audit for SMC, ISSC and MLS expiration dates alignment, the following conditions shall be met:

- 1) Lead Auditor shall be qualified for MMS certifications in accordance with the requirements [PR No. 10](#);
- 2) RS shall be authorized to conduct both the ISM Code, ISPS Code and MLC audits by MA;
- 3) Procedures for transfer of ISM Code and/or ISPS Code certification shall be applied in compliance with [PR No. 18](#) and PR No. 36 for MLC;
- 4) all elements of the ISM Code and/or ISPS Code and/or MLC shall be verified during audit for SMC, ISSC and MLC expiration dates alignment;
- 5) the results of the audits shall be documented and submitted separately and in compliance with [PR No. 9](#) (refer to 4.9 of the Guidelines) and [PR No. 24](#) (refer to 5.9 of the Guidelines) and PR No. 40 on MLC.

Note 34:

- fact of the ISM/ISPS Code aligned audits for SMC and ISSC expiration dates alignment shall be entered in the ISM/ISPS Audit Plan depending on which audit is aligned. In such case, the following entry shall be made into the Plan: "During the ISM and ISPS Code audits, aligning the expiry dates of certificates, SMC and ISSC, has been performed upon the Company's request";
- upon the Company's request to carry out the ISM/ISPS Code audits simultaneously, conditions of 4.7.4.7 of the Guidelines shall be met.

1.2 Alignment of SMC and ISSC expiry dates shall only be carried out during the renewal audit. SMC and ISSC expiration dates shall be aligned with the minimum validity period of one of the certificates.