

Commonwealth of Dominica



Office of the Maritime Administrator

TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF MERCHANT SHIPS, AND RECOGNIZED ORGANIZATIONS

SUBJECT: Handling ISM, ISPS, AND MLC, 2006 Due to the Exceptional Circumstance of Covid-19

This Marine Safety Circular (MSC) provides information on alternative arrangements where an auditor or inspector cannot attend due to restrictions imposed as a result of the Coronavirus disease (COVID-19) pandemic. Except as otherwise stated within this MSC, a Recognized Organization (RO) or Recognized Security Organization (RSO) must inform and obtain concurrence from the Commonwealth of Dominica Maritime Administration (the “Administration”) when utilizing these alternatives.

1.0 International Safety Management (ISM) Code

1.1 Internal Annual ISM Verification

The Administration will allow for a three-month extension to the 12-month interval for shoreside and shipboard internal audits, as it has determined that COVID-19 constitutes an *exceptional circumstance* for the purposes of ISM Code §12.1. In the affected cases, the audit may be postponed for up to three months without further authorization from the Administration.

For audits to be carried out during the three-month extension period, the Administration will accept a remote audit in lieu of a physical audit if it meets all the requirements of ISM Code

§12. No further authorization to carry out a remote internal audit is required from the Administration. This may also be applied to internal audits which are required to be completed prior to the external verification.

1.2 External Initial ISM Verification

The Administration will authorize an extension of the Interim Safety Management Certificate (SMC) in accordance with ISM Code §14.3. The validity will be for the minimum period required to complete the initial verification.

1.3 Intermediate ISM Verification

The Administration will authorize the issuance of a short-term SMC that is valid for a period of no longer than three months. Supporting documentation from the RO must show that the Company's original request for the verification was made prior to the SMC's third anniversary date.

1.4 External Renewal ISM Verification

The Administration will authorize an extension of the SMC for no longer than three months in accordance with ISM Code §13.14.

1.5 Document of Compliance Verification

Where a Company cannot complete the required Document of Compliance (DOC) verifications in accordance with ISM Code, the Administration will authorize the issuance of a short-term DOC. This will be handled on a case-by-case basis upon a recommendation from the RO.

2.0 International Ship and Port Facility Security (ISPS) Code

2.1 Internal Annual ISPS Verification Refer to §1.1 of this MSC.

2.2 Initial ISPS Verification

The Administration will authorize a consecutive Interim International Ship Security Certificate (ISSC) in accordance with ISPS Code A-19.4.5. The validity will be for the minimum period required to complete the initial verification.

2.3 Intermediate ISPS Verification

The Administration will authorize the issuance of a short-term ISSC that is valid for a period of no longer than three months. Supporting documentation from the RSO must show that the Company's original request for the verification was made prior to the ISSC's third anniversary date.

2.4 Renewal ISPS Verification

The Administration will authorize an extension of the ISSC for no longer than three months in accordance with ISPS Code A-19.3.5.

3.0 Maritime Labour Convention, 2006 (MLC, 2006)

MLC, 2006 does not provide for the extension of initial, intermediate, or renewal inspections. However, where there is adequate justification and supporting

documentation that an inspector is unable to attend, a short-term certificate may be issued. The validity will be for the minimum period required to complete the required inspection.

4.0 Remote External Verifications

Remote external verifications are audits conducted using Information and Communication Technology (ICT) where physical attendance to the site being audited is not possible.

Remote external verifications will be considered on a case-by-case basis as a temporary alternative method when the traditional on-site audit is not possible due to the COVID-19 pandemic and options, such as an extension or reissuance of an expiring certificate, have been exhausted (see §1.0, §2.0 and §3.0 of this MSC). Examples include expiring interim certificates, intermediate audit windows closing, and annual and renewal audits coming due.

An RO or RSO must request Administration authorization to conduct an remote external verifications as defined in this section.