

Republic of the Marshall Islands

MARITIME ADMINISTRATOR

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MARINE SAFETY ADVISORY No. 17-20

To: Owners/Operators, Masters, Nautical Inspectors, Recognized Organizations

Subject: TEMPORARY ALTERNATIVE INSPECTION PROTOCOLS DURING COVID-19 PANDEMIC RESPONSE AND RECOVERY

Date: 16 April 2020

This Marine Safety Advisory (MSA) supersedes MSA No. 13-20.

1.0 CORONAVIRUS DISEASE (COVID-19)

- 1.1 The Republic of the Marshall Islands (RMI) Maritime Administrator (the “Administrator”) is providing the following information on inspection protocols during the COVID-19 pandemic for RMI-flagged vessels. MSA No. [11-20](#) provides a general overview of the COVID-19 impact upon vessel operations to date. Updates and new information will be posted to the Administrator’s COVID-19 [webpage](#) as needed.
- 1.2 The purpose of this MSA is to announce a Temporary Alternative Inspection Protocol (TAIP) to meet the Administrator’s inspection requirements identified in RMI Maritime Regulations ([MI-108](#)), §5.34 and RMI Marine Notice [5-034-1](#) where a physical inspection of the vessel by an RMI Nautical Inspector is not possible due to COVID-19 safety concerns.
- 1.3 **Please Note:** This temporary protocol is separate from RMI Marine Notice [5-034-2](#), which is applicable to vessels not covered by international conventions and vessels operating in remote, offshore, or areas experiencing civil unrest where a Nautical Inspector may not be readily available.

2.0 APPLICABILITY

All RMI-flagged vessels requiring inspection under MI-108, §5.34 are considered as qualifying vessels for purposes of this TAIP.

3.0 PROCEDURES FOR VESSEL OWNERS OR OPERATORS

- 3.1 Upon receipt of the automated “inspection due” email notification, the owner or operator must provide the vessel’s itinerary and any additional requested information to the appropriate regional office as stated in the notification.

This MSA expires one (1) year after its issuance, unless otherwise noted, extended, superseded, or revoked.

- 3.2 If an in-person inspection by a Nautical Inspector is not feasible due to COVID-19 safety concerns, the regional Fleet Operations Manager may employ the TAIP after reviewing the performance history of the vessel and company. This includes possibly postponing or rescheduling the inspection for a later date or conducting the inspection remotely with crew interaction.
- 3.3 The Administrator may provide credit for one completed flag State inspection if all TAIP requirements are met, deficiencies reported are properly addressed according to the vessel's Safety Management System (SMS), and there are no outstanding Administrator requests for additional information.

4.0 OPTIONS UNDER THE TAIP

4.1 Annual Safety Inspections

- 4.1.1 RMI-flagged vessels due for an inspection or becoming due for an inspection within three months of this notice, that have good flag and port State control performance histories, and are currently on a 12-month inspection interval, will be given an additional three months to complete the required annual flag State inspection. This postponement will be documented in the Administrator's inspection scheduling database and rescheduled as needed.
- 4.1.2 Other RMI-flagged vessels not in the above category may be required to complete a remote inspection. Vessels identified for a remote flag State inspection will be notified and provided with a list of questions relevant to the ship's documentation, equipment maintenance, and crew's emergency preparedness. The questions must be completed by the Master or Chief Engineer and submitted to the scheduling office prior to arrival in port. A regional critical items checklist (such as the [MSD 340](#) for vessels calling ports in the United States, the [MSD 340AC](#) for vessels calling in Australia or China, or sections of the [MSD 252](#)) may be used to meet this requirement. The Master also may be required to submit evidence to demonstrate compliance. This includes photographs, copies of logbook entries, maintenance records, or other such information as requested.
- 4.1.3 RMI-flagged Mobile Offshore Units (MOUs) not meeting §4.1.1 may be required to complete a remote inspection. MOUs identified for a remote flag State inspection will be notified and requested to complete the [MSD 252MOU](#), *Safety Inspection Report*, the [MSD 252MOUSUPP](#), and provide verification of compliance to the critical items annotated in the [MSD 252MOUIG](#) (noted by an asterisk). Additional questions relevant to the unit's documentation, equipment maintenance, and crew's emergency preparedness may be requested from the Master, Offshore Installation Manager, or appointed designee and further supported by photographs, copies of logbook entries, maintenance records, or other such information as requested.

4.2 Special Inspections

- 4.2.1 Vessels on a reduced interval for their annual inspection and that are due for a special inspection may be eligible to undergo a remote flag State inspection as described in §4.1.2 above. The scope of the remote flag State inspection will be outlined by the Administrator.
- 4.2.2 Documentary evidence of compliance that may be required by the Administrator for this remote inspection includes, but is not limited to the following:
- .1 Copies of the following:
 - a. Oil Record Book log entries (last 30 days);
 - b. Lifesaving and firefighting preventative maintenance logbook (most recent entries);
 - c. Crew payment and crew rest hour records (most recent);
 - d. External and internal audit findings for any non-conformities (most recent);
 - e. Last confined space entry date (official logbook entry);
 - f. Last fire and abandon ship drill date (official logbook entry);
 - g. Last operational test of the rescue boat and lifeboat to include the date of the later waterborne drill - the lifeboat and rescue boat must start on the first attempt, be able to engage ahead and astern, and the rudder must be capable of shifting from full port to full starboard (official logbook entry); and
 - h. Date of the Master's last SMS review (most recent).
 - .2 Digital images or video of the following:
 - a. Rescue boat and lifeboat (hull, windows, and wire rope);
 - b. Discharge of water from two fire hoses and the emergency fire pump gauge pressure;
 - c. Emergency generator and auxiliary engines running;
 - d. Steering gear; and
 - e. Fixed firefighting equipment, like the CO₂ room, foam or water mist systems.

- 4.2.3 In lieu of physically boarding the vessel, the Administrator will speak with the Designated Person Ashore, Master, or Chief Engineer (if possible) on the telephone, or other agreed communication platform, while in port and review the results of the self-inspection checklists and the submitted information.

4.3 Quality Control Boardings (QCBs)

In the best interest of owners and operators, the Administrator will continue to conduct QCBs. These may also be done remotely following many of the same principles outlined above. An important aspect of this program is interaction between the Administrator's Fleet Operations department, the vessel owner and operator, the vessel's crew, and the proper notification of deficiencies to local coastal State or port State control authorities when required. Transparency of operations and information will be essential to the success of this program during the COVID-19 pandemic.

5.0 TEMPORARY PROTOCOL

- 5.1 All parties are reminded that this is a temporary alternative program which may be employed as an alternative means to verify compliance with the Administrator's requirement for a safety inspection of the vessel. It does not alter any of the Administrator's other requirements. The final decision to utilize the TAIP will be assessed and approved by the Administrator on a case-by-case basis.
- 5.2 Communication between the vessel, owner or operator, Administrator, Recognized Organizations, and port or coastal States is critical as we must work together to ensure continued crew and vessel safety, and security and protection of the marine environment while facilitating essential maritime trade during this pandemic.
- 5.3 Specific questions regarding this temporary protocol may be directed to: inspections@register-iri.com.
- 5.4 Specific questions regarding yachts should be sent to: yacht-inspections@register-iri.com.
- 5.5 Specific questions regarding MOUs should be sent to: inspections-offshore@register-iri.com