

Category: Instruction No.: 3-2020

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COVID-19 - Verification of safety management systems (ISM) by means of remote audits

1. Purpose

- 1.1. Instructions to Class (IC) 3-2020 instructs Recognised Organisations (ROs) on the possibility of carrying out remote audits as an alternative to on-site audits for the purpose of verifying that safety management systems comply with the requirements of the ISM Code.

2. Application

- 2.1. IC 3-2020 applies to Norwegian flagged cargo ships registered in the Norwegian Ordinary Ship Register (NOR) or the Norwegian International Ship Register (NIS).

3. Definitions

- 3.1. N/A

4. References

- 4.1. Agreement of 1 June 2002 between the Ministry of Trade, Industry and Fisheries and ROs concerning surveys of ships registered in a Norwegian ship register (the Agreement) article 2.2.
- 4.2. Annex I to the Agreement paragraph 3.1
- 4.3. Annex II to the Agreement paragraph 3.1.13
- 4.4. IMO Circular Letter No. 4204/Add.1
IMO Circular Letter No. 4204/Add.2
IMO Circular Letter No. 4204/Add.3
IMO Circular Letter No. 4204/Add.4
- 4.5. IMO Res. A.1118(30) "Guidelines on the implementation of the International Safety Management (ISM) Code by Administrations"
- 4.6. IC 1-2020 Extension of certificates and vessel instructions

5. Background

- 5.1. Since the outbreak of the coronavirus disease in 2019 (COVID-19), the Norwegian Maritime Authority (NMA) has received inquiries from shipowners and ROs to allow alternatives to on-site audits for the purpose of verifying that companies and ships comply with the statutory requirements of the ISM Code.
- 5.2. Travelling, both nationally and internationally, has become increasingly difficult with the currently imposed travel bans. Combined travel restrictions laid down by governments and companies cause difficulties in terms of verifying ISM compliance by on-site audits.
- 5.3. Based on the measures introduced by governments aimed to slow down the spread of the coronavirus (COVID-19), the NMA will allow for remote audits for the purpose of verifying that the company and its shipboard management operate in accordance with requirements of the ISM Code.
- 5.4. For Norwegian ships and companies, the NMA accepts that internal audits required by the ISM Code Part A paragraph 12.1 are carried out as remote audits using digital means. Approval by the NMA is not required.
- 5.5. If remote audits are not possible, an extended deadline of 3 months is granted for internal audits of DOC/SMC that expire before 12 June 2020.
- 5.6. If the 12-months interval for internal audits laid down in the ISM Code Part A, paragraph 12.1 is exceeded, records shall be available in the companies' non-conformity systems and be handled according to the companies' internal procedures for managing non-conformities.

6. Repeal

- 6.1. None

7. Item

- 7.1. As an alternative solution to on-site ISM audits during the coronavirus crisis the NMA has decided that the following audits may be carried out as remote audits using digital means
 - 7.1.1. renewal audits and annual DOC audits;
 - 7.1.2. interim SMC and DOC audits.
- 7.2. The requirements in paragraph 4.12 of IMO Res.A.1118(30) "Guidelines on the implementation of the International Safety Management (ISM) Code by Administrations" should be followed.
- 7.3. Digital means shall be used to remotely obtain audit evidence and evaluate it objectively in order to determine to what extent the auditee conforms to the requirement of the ISM Code.
- 7.4. Audit/assessment of documents and records may be carried out by means of remote access.
- 7.5. Interviews may be carried out by means of teleconference facilities, including audio, video and data sharing.
- 7.6. If at ROs' discretion remote audits cannot be conducted, the validity of ISM certificates that expire before 12 June 2020 is extended by 3 months without further approval by the NMA, ref. IC 1-2020.

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