

▶ CONVERTING FROM THE DOMESTIC SAFETY MANAGEMENT CODE TO THE INTERNATIONAL SAFETY MANAGEMENT CODE

Changes made by the Maritime & Coastguard Agency (MCA) to the Domestic Safety Management Code (DSMC) requirements of how Passenger Ship Safety certificates are issued has encouraged much conversation on the viability of converting to the International Safety Management Code (ISM).

To assist we have tried to answer some of the most frequent questions that have arisen:

THE LIST OF SAFETY MANAGEMENT SYSTEM (SMS) REQUIREMENTS FOR THE DSMC LOOKS ALMOST IDENTICAL TO THE ISM CHAPTERS. IS THERE MUCH DIFFERENCE BETWEEN BEING ISM COMPLIANT AND DSMC COMPLIANT?

No, the new DSMC requirements that have been implemented are not much different to that of the ISM. If you already have a robust SMS in place for DSMC then the transition between the codes should be relatively easy.

IS THE CERTIFICATION PROCESS ANY DIFFERENT?

Yes. You will be required to hold a Passenger Ship Safety Certificate under both DSMC and ISM, these are issued to the vessel and are valid for 12 months.

DSMC : The Domestic Safety Management Certificate is issued to the vessel and is valid for a maximum of five years and will require an intermediate audit either at the second or third anniversary of the issue date.

ISM: An interim Document of Compliance (DOC) is issued for 12 months. Prior to this expiring a satisfactory audit will need to take place to obtain an initial DOC. This certificate is issued to the company and is valid for five years subject to annual periodic verification. Annual periodic verification can take place up to three months before or three months after the annual anniversary of the issue date until the renewal is due and this can take place up to three months before the expiry only.

An interim Safety Management Certificate (SMC) is issued for six months, the audit for an interim SMC needs to take place during the validity of the interim DOC. Prior to the interim SMC expiring a satisfactory audit will need to take place to obtain an initial SMC. This certificate is issued to the vessel and is valid for five years subject to one intermediate verification audit between the second and third anniversary of issue.

Vessel SMC's are not valid unless the company has a valid DOC in place.

WILL ANY TRAINING BE REQUIRED FOR ISM?

Yes, the whole company will require training on the ISM Code. This will give staff a basic understanding of where your SMS has derived from and why you are incorporating this standard.

You will need to meet with all Managers/Captains to ensure they are fully conversant with your SMS and with their roles and responsibilities. Once you are confident that they understand this, you can then get your Managers/Captains to filter this information to their teams. Ensuring your Managers/Captains are fully conversant with the system will stop them passing on incorrect information. This process is much like you would do with your DSMC SMS.

ARE SELF-ASSESSMENTS AND PERIODIC REVIEWS REQUIRED FOR ISM?

Yes, although these will be referred to as internal audits and they should be carried out on board and ashore at intervals not exceeding 12 months.

It is important that your staff don't interpret auditing as an opportunity for you to 'spy' on them, but instead understand that you are ensuring the system you have created is robust, practical to the vessel's operation and adhering to the ISM Code.

Internal auditors do not have to be a member of management but they should be independent of the area they are auditing, unless this is impractical due to the size and nature of the company.

IS THERE A DIFFERENCE WITH THE ROLE OF DESIGNATED PERSON (DP) BETWEEN THE ISM AND DSMC?

The roles and responsibilities for a DP remain the same for both ISM and DSMC, however for ISM the DP or persons have to have experience, training and the relevant qualifications.

The designated person must have direct access to the highest levels of management providing a link between the company and those on board.

The responsibility and authority of the DP is to ensure the safe operation of the vessels. They should monitor the safety and pollution prevention aspects of the operation of each vessel and ensure there are adequate shore side resources and support.

More information on the qualifications, training and experience necessary for undertaking the role of DP under ISM can be found in MSC-MEPC.7/Circ.6.

WHAT IS THE PROCESS TO GO FROM DSMC TO ISM?

- ISM SMS submitted to the MCA for document review.
- Interim DOC audit.
- Interim DOC issued for 12 months.
- Interim SMC audit.
- Interim SMC issued for 6 months.
- Initial DOC audit prior to the interim DOC expiring.
- Initial DOC issued for 5 years subject to annual periodic verification.
- Initial SMC audit prior to the interim SMC expiring.
- Initial SMC issued for 5 years subject to one intermediate verification audit between the second and third anniversary of issue.

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