



TECHNICAL INSTRUCTIVE
Statutory Certification for
ISM Code-Company
Document of Compliance (DOC)

Code: PO02-TI06
Version: 02
Page: 1 of 21
Date: 11-2020

0. Content.

Section No.	Title of the Section	Page
1.	Objectives	2
2.	Application	2
3.	Scope	2
4.	Relevant documentation	2
5.	Definitions	2
6.	General provisions for the Company certification	3
7.	The ability of the SMS to meet safety management objectives	5
8.	Company document review	5
9	Certification services and verification activities	5
9.1	Interim verification	5
9.2	Initial verification	6
9.3	Annual verification	6
9.4	Renewal verification	7
9.5	Additional verification	8
9.6	Issuance of Full-Term DOC	8
10.	Preparing the audit	9
11.	Executing the audit	9
12.	Audit report	10
13.	Corrective action follow-up	11
14.	Company responsibilities pertaining to safety management audits	11
15.	Responsibilities of the audit team	12
16.	Response to major non-conformities	12
17.	Withdrawal of certification	12
18.	Record of information (supporting documentation)	12
19.	Applicable Forms for Company certification	13
20.	Documented information revoked and modifications	13
21.	Annexes	14
Annex 1	Company branch office verification	15
Annex 2	Communications with flag states and between ROs	16
Annex 3	Ship types on DOCs and SMCs	17
Annex 4	Company certification scenarios	18
Annex 5	Verification of compliance with flag state requirements	19
Annex 6	Requirements for ISM Code Auditor	20



TECHNICAL INSTRUCTIVE

Statutory Certification for ISM Code-Company Document of Compliance (DOC)

Code: PO02-TI06

Version: 02

Page: 2 of 21

Date: 11-2020

1. Objectives.

- .1 The purpose of this Instructive is to provide procedures and criteria to carry out the Statutory Certification of the Company in compliance with the requirements of the ISM Code, including the issuance of the corresponding Document of Compliance (**DOC**).

2. Application.

- .1 The ISM Code is applied to the Company responsible for the operation of ships who has accepted to take over all the duties and responsibility imposed by such Code.
- .2 The Instructive will enter into force on **01 January 2021**.

3. Scope.

- .1 This Instructive must be used by the Marine Division and designated Auditors to carry out the Statutory Certification of the Company, which comprises:
 - .1 Performing of the certification services and verification activities (audits);
 - .2 Issuance of the corresponding DOC, including Interim and Short-Term DOC;
 - .3 Withdrawal of Certification.
- .2 This Instructive must be used by the Marine Division, as responsible of the ISM Code certification, to ensure that the certification process is performed in accordance with the provisions of the ISM Code and relevant flag State requirements.

4. Relevant documentation.

- .1 The following documentation is relevant for the control of this Instructive:
 - .1 IMO Resolution A.741(18)-International Safety Management (ISM) Code, as amended.
 - .2 IMO Resolution A.1118(30)-Revised guidelines on the implementation of the International Safety Management (ISM) Code by Administration, as amended.
 - .3 IMO Resolutions MSC.349(92) and MEPC.237(65)-Code for Recognized Organizations (RO Code).
 - .4 IACS N^o.9-Procedural Requirements for ISM Code Certification.
 - .5 IACS N^o.10-Procedure for the selection, training, qualification and authorization of Marine Management System Auditors.
 - .6 ISO 19011-Guidelines for auditing management system.
 - .7 National Legislation of the flag States, as required.
- .2 Under permission granted by IACS Procedure, Volume 1: General Procedures, D3.6, Term and Conditions for use the IACS Resolutions, URs, CSR and Technical Information by the Classification Societies which are not members of IACS, the PR 09 and PR10 have been used in this Instructive as reference for providing technical requirements.

5. Definitions.

- .1 **Safety Management System:** means a structured and documented system enabling Company personnel to implement effectively the Company safety and environmental protection policy.
- .2 **Company:** means the Owner of the ship or any other organization or person such as the Manager, or the Bareboat Charterer, who has assumed the responsibility for operation of the ship from the Shipowner and who on assuming such responsibility has agreed to take over all the duties and responsibility imposed by the ISM Code.



TECHNICAL INSTRUCTIVE

Statutory Certification for ISM Code-Company Document of Compliance (DOC)

Code: PO02-TI06
Version: 02
Page: 3 of 21
Date: 11-2020

- .3 **Document of Compliance (DOC):** means a document issued to a Company which complies with the requirements of the ISM Code.
- .4 **Anniversary date:** means the day and month of each year that corresponds to the date of expiry of the relevant document or certificate.
- .5 **Audit:** means a process of systematic and independent verification, through the collection of objective evidence, to determine whether the SMS complies with the requirements of the ISM Code and whether the Safety Management System (SMS) is implemented effectively to achieve the Code's objectives.
- .6 **Auditor:** means a person who is qualified and authorized to carry out ISM audits.
- .7 **Lead Auditor:** means an Auditor who is authorized to lead a team of two or more Auditors.
- .8 **Branch Office:** means a shore-based location identified by the Company responsible under the ISM Code which may perform safety management system related tasks and is operating under the same SMS of the Company.
- .9 **Safety Management Manual:** is the documentation used to describe and implement the SMS.
- .10 **Observation:** means a statement of fact made during a safety management audit and substantiated by objective evidence. It may also be a statement made by the Auditor referring to a weakness or potential deficiency in the SMS which, if not corrected, may lead to a nonconformity in the future.
- .11 **Non-conformity:** means an observed situation where objective evidence indicates the non-fulfilment of a specified requirement.
- .12 **Major non-conformity:** means an identifiable deviation that poses a serious threat to the safety of personnel or the ship or a serious risk to the environment that requires immediate corrective action or the lack of effective and systematic implementation of a requirement of the ISM Code.

6. General provisions for the Company certification.

- .1 The Company responsibilities and authority imposed by the ISM Code includes:
 - .1 If the entity who is responsible for the operation of the ship is other than the owner, the owner must report the full name and details of such entity to the Administration.
 - .2 The Company should define and document the responsibility, authority and interrelation of all personnel who manage, perform and verify work relating to and affecting safety and pollution prevention.
 - .3 The Company is responsible for ensuring that adequate resources and shore-based support are provided to enable the designated person or persons to carry out their functions.
- .2 The management of the Company certification services shall:
 - .1 Be carried out by those who have practical knowledge of ISM Code certification procedures and practices;
 - .2 Ensure that the designated Auditors comply with the requirements relating to education, training, work experience and audit experience specified;
 - .3 Ensure that the qualification and experience of the Auditors are adequate and appropriate for the size and complexity of the Company to be audited.
- .3 ICS Class shall ensure that personnel providing ISM related consultancy services and personnel providing the certification are entirely independent.



TECHNICAL INSTRUCTIVE

Statutory Certification for ISM Code-Company Document of Compliance (DOC)

Code: PO02-TI06

Version: 02

Page: 4 of 21

Date: 11-2020

- .4 Where ICS Class is involved in the ISM Code certification of a single Company with one or more ROs, arrangements shall be made for appropriate communications between all to ensure the exchange of the relevant information.
- .5 The Company certification shall be carried out through the following certification services and verification activities (audits):
 - .1 Interim Verification.
 - .2 Initial Verification.
 - .3 Annual Verification.
 - .4 Renewal Verification.
 - .5 Additional Verification, when required by the Administration.
- .6 The Company certification shall be carried out by issuing of the following Statutory Certificates:
 - .1 Interim DOC: It shall be issued by the Auditor upon satisfactory completion of the Interim Verification. The Interim DOC shall be issued valid for six (6) months counted from the completion date of the Interim Verification.
 - .2 Short-Term DOC: It shall be issued by the Auditor upon satisfactory completion of the Initial or Renewal Verification in order to permit the operation of the Company while the Full-Term DOC is prepared. The Short-Term DOC shall be issued valid for five (5) months counted from the completion date of the Initial or Renewal Verification.
 - .3 Full-Term DOC: It shall be issued by the Marine Division upon satisfactory verification of the Initial or Renewal Verification carried out by the Auditor. The Full-Term DOC shall be issued for a period not exceeding five (5) years counted from the completion date of the Initial or Renewal Verification. A certificate of shorter validity may be issued in accordance with flag State requirements. The validity of the Full-Term DOC shall be subject to Annual Verifications within three months before or after the anniversary date.
- .7 The DOC is only valid for the ship types explicitly indicated in the document. Such indication shall be based on the types of ships on which the Initial Verification was based. Other ship types should only be added after verification of the Company's capability to comply with the requirements of this Code applicable to such ship types. In this context, ship types are those referred to in SOLAS Convention, Chapter IX, Regulation 1.
- .8 A copy of the DOC (Interim, Short Term or Full-Term, as appropriate) shall be made available by the Company to each shoreside premises and each applicable ship in the Company's fleet.
- .9 The reasons for which a Full-Term DOC shall become invalid include:
 - .1 Corrective actions are not completed within the agreed schedule;
 - .2 Amendments to the ISM Code are not taken into account;
 - .3 There is evidence of an unresolved major non-conformity; and
 - .4 The Company does not request the Annual Verification.
- .10 When Full-Term DOC become invalid, the Marine Division shall immediately notify to the relevant Administration. When possible, the DOC shall be withdrawn from the Company.
- .11 Where a Full-Term DOC has been withdrawn, the Section 17 below shall be fulfilled.



TECHNICAL INSTRUCTIVE

Statutory Certification for ISM Code-Company Document of Compliance (DOC)

Code: PO02-TI06

Version: 02

Page: 5 of 21

Date: 11-2020

7. The ability of the SMS to meet safety management objectives.

- .1 The purpose of an audit is to verify that:
 - .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.
- .2 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 Auditors with statutory and classification records relevant to actions taken by the Company to ensure that compliance with mandatory Rules and Regulations is maintained. In this regard, records may be examined to substantiate their authenticity and veracity. The Company shall ensure that the Auditor has access to statutory and classification records during audits, also when these records are issued by another Classification Society, other RO or the Administration itself.
- .3 The audit is based upon a sampling process. Where no non-conformities have been reported, it should not be assumed that none exists.

8. Company Document Review.

- .1 The Company Document Review shall be carried out for planning the Initial or Renewal Verification (audit), as appropriate. As a basis for planning the audit, the Auditor should review the Safety Management Manual to determine the adequacy of the SMS in meeting the requirements of the ISM Code. If this review reveals that the system is not adequate, the audit will have to be delayed until the Company undertakes corrective action. Amendments made to the system documentation to correct deficiencies identified during this review may be verified remotely or during the subsequent implementation audit.
- .2 The Company Document Review will, wherever possible, be carried out at the Company's main office or at the office from which the SMC is controlled. The client should be encouraged to undertake the Company Document Review at least one (1) month in advance of the Initial or Renewal audit of the Company's office. Should this not be practical for logistical reasons, then the following options may be followed, after authorization of the Marine Division:
 - .1 Undertake the Company Document Review remotely, or
 - .2 Undertake the Company Document Review immediately prior to the Initial or Renewal audit.
- .3 The above two options are to be used only where there is no reasonable alternative. The client must be advised that, in the case of option N^o.2, if major problems are found, the client may be charged for the remainder of the Initial or Renewal audit if postponed.

9. Certification services and verification activities (audits).

9.1 Interim Verification.

- .1 The Interim Verification may be carried to facilitate the Initial Implementation of the ISM Code under the following scenarios only:
 - a) a Company is newly established; or
 - b) new ship types are to be added to an existing DOC.



TECHNICAL INSTRUCTIVE

Statutory Certification for ISM Code-Company Document of Compliance (DOC)

Code: PO02-TI06

Version: 02

Page: 6 of 21

Date: 11-2020

- .2 Upon satisfactory completion of the Interim Verification, an Interim DOC shall be issued to the Company following a demonstration, at the Company's premises, that the Company has a documented SMS which addresses all elements of the ISM Code, and that plans exist for its implementation throughout the organization and its fleet within the period of validity of the Interim DOC. The progress of such implementation may be reviewed and verified at intervals during the validity of the Interim DOC.
- .3 The Interim DOC shall be issued valid for six (6) months counted from the completion date of the Interim Verification.

9.2 Initial Verification.

- .1 The Initial Verification consists of the following steps:
 - a) Company Document Review (according to Section 8 above).
 - b) a satisfactory review of any changes made to the documented SMS since the Interim DOC was issued.
 - c) 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.
- .2 Upon satisfactory completion of the Initial Verification, a Short-Term DOC shall be issued in order to permit the operation of the Company while the Full-Term DOC is prepared. The Short-Term DOC shall be issued valid for five (5) months counted from the completion date of the Initial Verification.
- .3 The Short-Term DOC shall be issued provided no major non-conformities remain and the Auditor formally recommends the Company certification. To response to a major non-conformity raised on a Company, refer to Section 16 below.

9.3 Annual Verification.

- .1 The Annual Verification is intended to:
 - a) maintain a follow up on the Company certification.
 - b) maintain the validity of the Full-Term DOC.
- .2 The Annual Verification shall be carried out within three months before or after each anniversary of the Full-Term DOC.
- .3 The purpose of the Annual Verification is, inter alia, to verify:
 - a) the effective functioning of the SMS;
 - b) that any modifications made to the SMS comply with the requirements of the ISM Code;
 - c) that corrective action has been implemented;
 - d) that statutory and classification certificates are valid and that no surveys are overdue.
- .4 During the Annual Verification, the statutory and classification certificates on at least one ship of each type identified on the Full-Term DOC shall be verified.



TECHNICAL INSTRUCTIVE
Statutory Certification for
ISM Code-Company
Document of Compliance (DOC)

Code: PO02-TI06
Version: 02
Page: 7 of 21
Date: 11-2020

- .5 Where the Company has more than one shoreside premises and/or the Company delegates safety management system tasks, the annual assessments shall endeavor to ensure that all sites are assessed during the period of validity of the Full-Term DOC.
- .6 During the Annual Verification, it shall be verified whether the company is operating all the ship types stated on the Document of Compliance. Appropriate action should be taken if the company has stopped operating a particular ship type.
- .7 Upon satisfactory completion of the Annual Verification, the Full-Term DOC shall be endorsed at the Annual Verification to certify that the SMS was found to comply with the requirements of the ISM Code. The Full-Term DOC shall be endorsed provided no major non-conformities remain and the Auditor formally recommends to maintain the validity of such Certificate. To response to a major non-conformity raised on a Company, refer to Section 16 below.
- .8 A copy of the Full-Term DOC endorsed shall be made available by the Company to each shoreside premises and each applicable ship in the Company's fleet.

9.4 Renewal Verification.

- .1 The Renewal Verification shall be carried out before the expire date of the Full-Term DOC. The Renewal Verification may be carried out within three months before the expire date of the Full-Term DOC and should be completed before this date.
- .2 Company Document Review shall be part of the Renewal Verification (according to Section 8 above).
- .3 The purpose of the Renewal Verification is, inter alia, to verify:
 - a) the effective functioning of the SMS;
 - b) that any modifications made to the SMS comply with the requirements of the ISM Code;
 - c) that corrective action has been implemented;
 - d) that statutory and classification certificates are valid and that no surveys are overdue.
- .4 During the Renewal Verification, the statutory and classification certificates on at least one ship of each type identified on the Full-Term DOC shall be verified.
- .5 Upon satisfactory completion of the Renewal Verification, a Short-Term DOC shall be issued in order to permit the operation of the Company while the Full-Term DOC is prepared. The Short-Term DOC shall be issued valid for five (5) months counted from the completion date of the Renewal Verification.
- .6 The Short-Term DOC shall be issued provided no major non-conformities remain and the Auditor formally recommends to maintain the Company certification. To response to a major non-conformity raised on a Company, refer to Section 16 below.
- .7 A copy of the Short-Term DOC shall be made available by the Company to each shoreside premises and each applicable ship in the Company's fleet.



TECHNICAL INSTRUCTIVE

Statutory Certification for ISM Code-Company Document of Compliance (DOC)

Code: PO02-TI06

Version: 02

Page: 8 of 21

Date: 11-2020

9.5 Additional Verification.

- .1 The Administration may, where there are clear grounds, require an Additional Verification to check if the Safety Management System still functions effectively. Additional Verifications may be carried out following situations beyond normal procedures such as port State Control detentions, or in the case of reactivation after the interruption of operations due to a period out of service, or in order to verify that effective corrective actions have been taken and/or are being properly implemented. Additional Verifications may affect the shore-based organization and/or the shipboard management system. The Administration should determine the scope and depth of the verification, which may vary from case to case. The Additional Verifications should be completed within the time period agreed, taking into account the guidelines developed by IMO. The Administration should follow up on the results of the verification and take appropriate measures, as necessary.
- .2 To carry out an Additional Verification related to any of the following scenarios, the authorization of the Administration is required:
 - a) PSC detention (Report of Inspection shall be submitted to the Administration).
 - b) Flag State detention.
 - c) To verify effective corrective actions were taken regarding any major non-conformity.
 - d) When substantial modifications have been made to the SMS.
 - e) When the Administration considers it necessary to request an Additional Verification in view of the nature of any non-conformity regarding of the SMS.
 - f) Any other scenario not specified in paragraph 9.5.3 below.
- .3 To carry out an Additional Verification related to any of the following scenarios, which arise during the validity of the existing Full-Term DOC, the authorization of the Administration is not required:
 - a) Change of name of the Company.
 - b) Change of address of the Company.
- .4 Upon satisfactory completion of the Additional Verification specified in paragraph 9.5.3 above, a Short-Term DOC shall be issued in order to permit the operation of the Company while the Full-Term DOC is prepared. The Short-Term DOC shall be issued valid for five (5) months counted from the completion date of the Additional Verification. Afterward, the Marine Division will issue a new Full-Term DOC with the same validity as the existing Certificate.

9.6 Issuance of Full-Term DOC.

- .1 After verification of the documentation supporting the Company certification in compliance with the Section 18 below, upon confirmation that the Initial or Renewal Verification has been fulfilled completely and are satisfactory in accordance with the provisions prescribed in ISM Code and this Instructive, the Marine Division will proceed to issue the corresponding Full-Term DOC
- .2 The Full-Term DOC shall be issued for a period not exceeding five (5) years counted from the completion date of the Initial or Renewal Verification.
- .3 After completion of the Renewal Verification, the issuance of the Full-Term DOC shall be made in compliance with the following requirements:



TECHNICAL INSTRUCTIVE

Statutory Certification for ISM Code-Company Document of Compliance (DOC)

Code: PO02-TI06
Version: 02
Page: 9 of 21
Date: 11-2020

- .1 When the Renewal Verification is completed within three months before the expiry date of the existing Full-Term DOC, the new Full-Term DOC should be valid from the date of completion of the Renewal Verification for a period not exceeding five years from the date of expiry of the existing DOC.
- .2 When the Renewal Verification is completed more than three months before the expiry date of the existing Full-Term DOC, the new Full-Term DOC should be valid from the date of completion of the Renewal Verification for a period not exceeding five years from the date of completion of the Renewal Verification.
- .4 The validity of the Full-Term DOC shall be subject to Annual Verifications.

10. Preparing the audit.

- .1 The Auditor(s) in co-operation with the Company shall produce an audit plan.
- .2 The audit plan is to 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 is to be communicated to the Company and those involved in the audit.
- .3 The audit plan shall include:
 - a) identification of the individuals or organizational units having significant direct responsibilities regarding the SMS;
 - b) identification of the Auditor(s);
 - c) the language of the audit;
 - d) the date and place where the audit will be conducted;
 - e) the schedule of meetings to be held with Company's management.
- .4 The Initial, Annual and Renewal Verification audits shall be performed only under normal operating conditions of the Company. Interim Verification audit may be conducted in circumstances other than normal operating conditions.

11. Executing the audit.

- .1 All scheduled, routine DOC audits (Initial, 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 prevention.
- .2 The audit is to start with an opening meeting, the purpose of which is to:
 - a) introduce the Auditor to the Company's management;
 - b) explain the scope and objective of the audit;
 - c) provide a short summary of the methods and procedures to be used to conduct the audit;
 - d) establish the official communication links between the Auditor and the Company personnel;
 - e) confirm that resources, documentation and facilities needed to perform the audit are available;
 - f) confirm the time and date of the closing meeting and any possible interim meetings.
- .3 Working documents may be used to facilitate the audit and to document the results, which may include:
 - a) checklists used for evaluating SMS elements, and
 - b) forms for reporting observations and documenting supporting evidence.



TECHNICAL INSTRUCTIVE

Statutory Certification for ISM Code-Company Document of Compliance (DOC)

Code: PO02-TI06

Version: 02

Page: 10 of 21

Date: 11-2020

Working documents should not restrict additional activities or investigations that may become necessary as a result of information gathered during the audit.

- .4 Consideration should be given to 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. Further visits may be necessary to complete the audit.
- .5 The Auditor should take into account any changes made to the SMS since the last external audit carried out.
- .6 The 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 collected through interviews, review of documentation and records, and observation of activities of the Company's operation.
- .7 Annual and Renewal Audits of the Company may include a review of non-conformities reported in relation to previously conducted Company and ship audits. The Auditor may 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, Part A, of the ISM Code.
- .8 When auditing a Company managing ships classed by another society, or for which the Administration or another RO performs the statutory surveys, the Auditor shall review the statutory and classification survey records for at least one ship of each ship type to which the DOC is to apply. These records shall be made available at the Company's office (refer to Section 7/7.2 above).
- .9 The Auditor is entitled to acquire the information he needs from the other Societies or, if relevant the Administration, in order to check the veracity of the information presented to him by the Company (refer to Section 7/7.2 above).
- .10 Audit findings are to be documented in a clear, concise manner and supported by objective evidence. These shall be reviewed by the Auditor in order to determine which are to be reported as major non-conformities, non-conformities, or observations.
- .11 At the end of the audit, prior to preparing the audit report, the Auditor(s) is to hold a meeting with the senior management of the Company and those responsible for the functions concerned. The purpose is to present major non-conformities, non-conformities and observations to the Company's management in such a manner so as to ensure that they clearly understand the results of the audit.

12. Audit Report.

- .1 The audit report shall be prepared by the Lead Auditor, based on information gathered by and discussed with the audit team members. It must be accurate and complete, reflect the content of the audit and should include the following items:
 - a) the date of completion of the audit;
 - b) the scope and objectives of the audit;
 - c) Auditor(s), Company's representatives;
 - d) all major non-conformities, non-conformities, and observations.
 - e) effectiveness of the SMS in the meeting the specified objectives, as final conclusions of the Audit.
- .2 The audit report shall be made available to the Company.



TECHNICAL INSTRUCTIVE

Statutory Certification for ISM Code-Company Document of Compliance (DOC)

Code: PO02-TI06

Version: 02

Page: 11 of 21

Date: 11-2020

- .3 The Company is to maintain audit report records of all audits performed both ashore and on board its ships (refer to Section 7/7.2 above).

13. Corrective Action Follow-up.

- .1 The non-conformity report (NCR) should state clearly the act or situation identified as non-compliant with the Company's SMC or the ISM Code.
- .2 The content of the NCR shall be complete and concise and written in such a manner as to be easily understood. Clarity should not be sacrificed for the sake of brevity.
- .3 When writing NCRs Auditor 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.
- .4 NCRs shall include a reference to the relevant clause or sub-clause of the ISM Code.
- .5 A DOC may be issued, endorsed or renewed before all identified nonconformities have been closed out provided that a schedule has been agreed between the Company and the Auditor for the implementation of the necessary corrective actions.
- .6 Additional Verifications (audits) may be necessary to confirm the validity of the DOC depending on the nature of any non-conformities identified. The Company is responsible for applying for any follow-up audit required by the Auditor.
- .7 The Company is responsible for formulating and implementing corrective actions for the non-conformities identified by the Auditor. A corrective action plan shall be submitted to the Auditor within an agreed time period. The proposals will be accepted if, as written, they appear to be an appropriate response to the non-conformities identified. A schedule not exceeding three (3) months from the date of completion of the audit shall be agreed for the implementation of the corrective actions. The effectiveness of the corrective actions shall be verified not later than the next scheduled audit (Annual or Renewal).
- .8 The review of the Company's responses to non-conformities described in paragraph 13.7 above, is applicable only to non-conformities that are not considered to be major.
- .9 Failure to implement the agreed Corrective Action may be treated as grounds for invalidation of the DOC.

14. Company responsibilities pertaining to safety management audits.

- .1 The verification of compliance with the requirements of the ISM Code does not relieve the Company of their obligation to comply with national and international legislation related to safety and protection of the environment.
- .2 The Company is responsible for:
 - a) informing relevant employees or organizational units about the objectives and a scope of the audit;
 - b) appointing responsible members of staff to accompany Auditor(s);
 - c) providing the resources needed by the Auditor(s) to ensure an effective and efficient verification process;
 - d) providing access and objective evidence as requested by Auditor(s);
 - e) co-operating with Auditor(s) to ensure that the audit objectives being achieved;
 - f) informing ICS Class about significant changes to the SMS, which may need an Additional Verification (audit) by ICS Class. These include major restructuring of the system (for example, the establishment of Branch Offices) and changes in the operations that introduce new hazards.
 - g) requesting Additional Verification, when required.



TECHNICAL INSTRUCTIVE

Statutory Certification for ISM Code-Company Document of Compliance (DOC)

Code: PO02-TI06

Version: 02

Page: 12 of 21

Date: 11-2020

15. Responsibilities of the audit team.

- .1 The Auditor is responsible for:
 - a) planning and carrying out assigned responsibilities effectively and efficiently;
 - b) complying with the applicable requirements and other appropriate directives;
 - c) reporting any major obstacles encountered in performing the audit;
 - d) organizing specialist technical assistance required to fulfill the competence requirements of the audit as and when necessary;
 - e) clearly communicating non-conformities and observations to the Company or shipboard management immediately;
 - f) reporting the full audit results clearly, conclusively and without undue delay;
 - g) making the audit report available to the Company or shipboard management;
 - h) verifying the effectiveness of corrective actions taken by the Company.
- .2 Documents and information pertaining to the certification shall be treated in confidence.
- .3 An Auditor identifying a technical deficiency deemed to present a serious threat to safety or the environment or that requires attention by the responsible RO or the Administration shall:
 - a) establish if the Company has taken appropriate action to correct the technical deficiency. In every case the Auditor shall establish that such technical deficiencies have been reported to the responsible RO or Administration.
 - b) establish whether the technical deficiency constitutes or is symptomatic of a major non-conformity and, if so, follow the requirements of Section 16 below.

16. Response to Major non-conformities.

- .1 A DOC cannot be issued, endorsed or renewed if a major non-conformity exists.
- .2 Major non-conformities identified during DOC verifications shall be reported to all Administrations on whose behalf DOCs have been issued and by which the RO is authorized.

17. Withdrawal of Certification.

- .1 The Company shall be required to notify the affected ships immediately its Full-Term DOC is withdrawn.
- .2 A Company whose DOC has been withdrawn (refer to Section 6/6.9 above) should not be issued with an Interim DOC. Furthermore, a new Full-Term DOC should not be issued unless an Initial Verification has been carried out. The new Full-Term DOC should have the same expiry date as the withdrawn Certificate.

18. Record of Information (supporting documentation).

- .1 After completing the certification services (verifications/audits), the Lead Auditor must provide to ICS Class-Head Office (Operation Department) with the following supporting documentation properly fulfilled:
 - .1 **For Interim Verification:**
 - a) ISM Code/Audit Plan.
 - b) ISM Code/DOC-Checklist for Interim Certification.
 - c) ISM Code/Company Verification Report.
 - d) ISM Code/Non-Conformity Report (if any).
 - e) Copy of the Interim DOC issued.



TECHNICAL INSTRUCTIVE
Statutory Certification for
ISM Code-Company
Document of Compliance (DOC)

Code: PO02-TI06
Version: 02
Page: 13 of 21
Date: 11-2020

- .2 **For Initial and Renewal Verification:**
 - a) ISM Code/DOC-Checklist for Company Review.
 - b) ISM Code/Audit Plan.
 - c) ISM Code/DOC-Checklist for Initial/Renewal/Additional Verification.
 - d) ISM Code/Company Verification Report.
 - e) ISM Code/Non-Conformity Report (if any).
 - f) Copy of the Short-Term DOC issued.
 - g) Reporting of Owners/Operators.
 - h) Reporting of Designated Person(s).
- .3 **For Annual Verification:**
 - a) ISM Code/Audit Plan.
 - b) ISM Code/DOC-Checklist for Annual Verification.
 - c) ISM Code/Company Verification Report.
 - d) ISM Code/Non-Conformity Report (if any).
 - e) Copy of the Full-Term DOC endorsed at Annual Verification.
- .2 In addition to the supporting documentation listed above, and where required, the following information shall also be provided by the Auditor:
 - .1 Changes made in the SMS.
 - .2 Evidences that, at the opinion of the Lead Auditor, demonstrate the effectiveness of the SMS in the Company, collected through interviews, review of documentation and records, and observation of activities of the Company's operation.

19. Applicable Forms for Company Certification.

- .1 ISM Code/Audit Plan (2010/01).
- .2 ISM Code/DOC-Checklist for Company Review (2015/01).
- .3 ISM Code/DOC-Checklist for Interim Certification (2011/09).
- .4 ISM Code/DOC-Checklist for Initial/Renewal/Additional Verification (2015/01).
- .5 ISM Code/DOC-Checklist for Annual Verification (2015/01).
- .6 ISM Code/Company Verification Report (2010/01).
- .7 ISM Code/Non-Conformity Report (2010/01).
- .8 DOC Interim (2010/01).
- .9 DOC Short Term (2010/01).
- .10 DOC Full-Term (2010/01).

20. Documented Information revoked and modifications.

- .1 Technical Instructive PO02-TI06-Statutory Certification for ISM Code-Company (DOC), version 01 (05-2020) has been revoked.
- .2 Section 0 "Content" has been included.



TECHNICAL INSTRUCTIVE

Statutory Certification for ISM Code-Company Document of Compliance (DOC)

Code: PO02-TI06

Version: 02

Page: 14 of 21

Date: 11-2020

21. Annexes.

- .1 Annex 1: Company Branch Office Verification.
- .2 Annex 2: Communications with Flag States and between ROs.
- .3 Annex 3: Ship types on DOCs and SMCs.
- .4 Annex 4: Company Certification Scenarios.
- .5 Annex 5: Verification of Compliance with Flag State requirements.
- .6 Annex 6: Requirements for ISM Code Auditor.

Jose A. Pérez Samper.
Principal Surveyor / samper@intermaritime.org
Tel. +507 322-0013 / Fax +507 226-5386
www.InterMaritime.org



TECHNICAL INSTRUCTIVE
Statutory Certification for
ISM Code-Company
Document of Compliance (DOC)

Code: PO02-TI06
Version: 02
Page: 15 of 21
Date: 11-2020

Annex 1

COMPANY BRANCH OFFICE VERIFICATION

1. General

- .1 Where a Company assigns SMS responsibilities to 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.
- .2 The audit of each Branch Office shall address each requirement of the ISM Code relevant to that office.
- .3 The Company shall have performed internal audits of all Branch Offices and relevant records shall be made available to the Auditors.
- .4 Where the Company assigns SMS responsibilities to Branch Offices, the list of Branch Offices shall be indicated in an attachment to the Full-Term DOC.

2. Initial DOC Verification (audit).

- .1 Where the same activities are performed by all Branch Offices, the number of Branch Offices to be verified is:
 - a) two if the total number of Branch Offices is two or three;
 - b) three if the total number of Branch Offices is from four to six; and
 - c) to be agreed on a case by case basis if the total number of Branch Offices is more than six.
- .2 Where different activities are performed by Branch Offices, the number of Branch Offices performing the same activities to be verified is:
 - a) Two if the total number of Branch Offices performing the same activities is two or three;
 - b) Three if the total number of Branch Offices performing the same activities is from four to six; and
 - c) To be agreed if the total number of Branch Offices performing the same activities is more than six.
- .3 Notwithstanding the above, if a Company nominates an office as its Head Office then it must be audited as part of the initial verification.

3. Annual DOC Verification (audit).

- .1 Annual audit shall ensure that all Branch Offices are visited during the period of validity of the Full-Term 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.
- .2 If an additional Branch Office is included by the Company in its SMS during the period of validity of the Full-Term DOC, it shall be verified no later than at the next scheduled verification at which time the additional Branch Office should be added to the list of Branch Offices. The additional Branch Office shall be included in the Full-Term DOC, when this Certificate is endorsed.



TECHNICAL INSTRUCTIVE

Statutory Certification for ISM Code-Company Document of Compliance (DOC)

Code: PO02-TI06

Version: 02

Page: 16 of 21

Date: 11-2020

Annex 2

COMMUNICATIONS WITH FLAG STATES AND BETWEEN ROS

1. To ensure that the requirements of SOLAS Chapter I Regulation 6(d), SOLAS Chapter IX, IMO Resolution A.1118(30) and Resolution A.741(18) as amended are fulfilled, the following communication procedures must be followed when a Full-Term DOC become invalid according to Section 6/6.9 above.
2. When a Certificate is invalidated, the ICS Class shall inform the relevant flag State and other ROs by issuing of a Statement Letter addressed to the Company stating the following information:
 - .1 Company name and address.
 - .2 IMO N°.
 - .3 Full-Term DOC N°.
 - .4 Type and date of audit conducted.
 - .5 Reason for invalidation of certification (specify).
 - .6 Name, Position, Society and Date.
 - .7 Distribution:
 - a) To Company.
 - b) Copy to Administration.
 - c) Copies to ROs responsible for issue of SMCs, if applicable.
3. The communication shall be limited to the identity of the Company, the substance of the major non-conformity and the date of audit.



TECHNICAL INSTRUCTIVE

Statutory Certification for ISM Code-Company Document of Compliance (DOC)

Code: PO02-TI06

Version: 02

Page: 17 of 21

Date: 11-2020

Annex 3

SHIP TYPES ON DOCs AND SMCs

1. Determination of ship types to be listed on DOCs.

- .1 The ship types listed on DOCs and SMCs shall be consistent with the specific ship types defined in SOLAS Convention, Chapter IX, Regulation 1 and on pertinent SOLAS documentation aboard ship.
- .2 The ship types listed on DOCs and SMCs shall be consistent with the service in which the ship operates. Some ships are designed for use in multiple services (for example OBOs). The ship types listed on the DOC and SMC must reflect the service(s) in which the ship is actually trading and fit to serve.
- .3 In the event that a multipurpose ship is voluntarily operated in only one of the services for which it is designed, then the DOC and SMC should list only the ship type corresponding to that service. When a ship is transferred to another service for which it is designed, an Interim DOC and SMC identifying the ship type appropriate to the new service may be issued. Subsequent to satisfactory verification of the ship's operation under a fully functional SMS for the additional ship type, the DOC and SMC may be reissued listing the pertinent ship types.

2. Retention of ship types on DOCs.

- .1 The Auditor shall determine at each scheduled (Initial, Annual and Renewal) audit of the Company, the ship types operated by the Company at the time of the audit. If the Auditor discovers that the Company no longer operates a ship type listed on the Full-Term DOC, the Auditor should either delete this ship type from the DOC immediately, or 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. The Full-Term DOC shall be re-issued at the next scheduled audit, no longer listing the ship type that is no longer operated.
- .2 If, at a scheduled audit, the Auditor determines that the Company has not been operating ships of a particular type since a previous audit, then this ship type should be removed from all DOC's. If, however, the Company continues to manage ships of a particular type within its fleet then, unless otherwise instructed by the Administration, all DOC's may be endorsed for this ship type.



TECHNICAL INSTRUCTIVE
Statutory Certification for
ISM Code-Company
Document of Compliance (DOC)

Code: PO02-TI06
 Version: 02
 Page: 18 of 21
 Date: 11-2020

Annex 4

COMPANY CERTIFICATION SCENARIOS

Nº.	Scenario	Type of audit	Minimum scope of audit	Carried out by:	Certificate issued
1.	Change of Company name and/or address.	Additional Verification	-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 Administration(s) to update the CSR for each ship.	Auditor	As required in Section 9/9.5.3 and 9.5.4 above. Reissue DOC and SMCs with new name (expiry date as previous certificates).
2.	Additional ship type on DOC.	Interim audit on site.	-Review changes to SMS to accommodate new ship type. -Review plans to implement changes (minimum of 1 ship required).	Auditor	Interim DOC for new ship type.
3.	Change from Interim DOC to Full DOC in Scenario 2.	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).
4.	Minor change to SMS.	Verify at next audit.	Assess potential impact on SMS when advised and decide whether visit is required.	-	No action.
5.	Major change to SMS.	Verify on site.	Verify changes are appropriate and adequate for new circumstances.	Auditor	No action.
6.	Additional flag.	Additional audit on site.	Verify availability of flag State instructions and their incorporation into the management system.	Auditor	Full-Term DOC with same expiry date as the DOC issued on behalf of the other flag State (s).

Note: Above scenarios may be subject to flag State requirements and should only be applied in the absence of any instructions from the Administration.



TECHNICAL INSTRUCTIVE

Statutory Certification for
ISM Code-Company
Document of Compliance (DOC)

Code: PO02-TI06

Version: 02

Page: 19 of 21

Date: 11-2020

Annex 5

VERIFICATION OF COMPLIANCE WITH FLAG STATE REQUIREMENTS

1. Unless otherwise instructed by the Administration, Auditor will verify compliance with particular flag State requirements by sampling in the same way that compliance with other mandatory requirements is verified.
2. The same approach will be adopted when a ship changes flag. Compliance with any special requirements that are imposed by the new flag State will be verified by sample at the next scheduled audit. An audit for the issue of an interim certificate in relation to any additional flag State requirements, followed by verification of full implementation, will be carried out only when specifically requested by the Administration concerned.
3. Where Administrations require routine verification of compliance with specific flag State requirements at every scheduled audit, ICS Class will make an estimation of, and reach agreement on, the additional time that will need to be added to the usual audit duration. The Administration will then be informed of the outcome and the fact that the audit duration will be increased accordingly.



TECHNICAL INSTRUCTIVE
Statutory Certification for
ISM Code-Company
Document of Compliance (DOC)

Code: PO02-TI06
Version: 02
Page: 20 of 21
Date: 11-2020

Annex 6

REQUIREMENTS FOR ISM Code AUDITOR

1. The Auditor must be able to demonstrate knowledge and understanding of:
 - .1 The principles and practice of management systems auditing (Standard ISO 19011 or equivalent).
 - .2 The requirements of the ISM Code and its interpretation and application.
 - .3 Mandatory rules and regulations and applicable codes, guidelines and standards recommended by the IMO, Administrations, Classification Societies and maritime industry organizations.
 - .4 Basic shipboard operations including emergency preparedness and response
2. In addition, the Auditor must demonstrate that he has the ability to apply such knowledge and understanding and that he is capable of carrying out effective verification audits of the shore-based and shipboard aspects of marine management systems against the ISM Code as applicable.
3. The Auditor must possess the competence to:
 - .1 Determine whether the management system elements conform or do not conform with the requirements of the ISM Code;
 - .2 Determine the effectiveness of the Company's safety management system, or that of the ship, in order to ensure compliance with rules and regulations as evidenced by the statutory and classification survey records;
 - .3 Assess the effectiveness of the safety management system to ensure compliance with other rules and regulations which are not covered by statutory and classification surveys and to enable verification of compliance with these rules and regulations; and
 - .4 assess whether the safe practices recommended by the IMO, Administrations, Classification Societies and maritime industry organizations have been taken into account.
4. The competences described above may be acquired as a result of any combination of the following:
 - .1 Previous relevant qualifications and experience.
 - .2 Theoretical training.
 - .3 Practical training.
5. The Auditor must have at least five (5) years of experience in areas relevant to the technical or operational aspects of shipboard operational management (selection criteria to be accepted for training). Such experience may be gained in the following ways:
 - .1 Ship classification or statutory surveys; or
 - .2 Sea-going service as a certificated watch-keeping officer; or
 - .3 Employment in a technical role (for example: technical manager, superintendent, operations manager) in a ship management company; or
 - .4 Any combination of these three.
6. The Auditor authorized to carry out ISM verifications (audits) must have completed at least four (4) training audits under supervision and in accordance with the following criteria:
 - .1 At least one (1) must be a Company audit.
 - .2 At least one (1) must be a shipboard audit.
 - .3 The training audits may be Initial, Renewal, Annual or Intermediate. Additional audit may be used only when audit covering all elements of the ISM Code and SMS.



TECHNICAL INSTRUCTIVE

Statutory Certification for ISM Code-Company Document of Compliance (DOC)

Code: PO02-TI06

Version: 02

Page: 21 of 21

Date: 11-2020

7. All training audits must be carried out under the supervision of suitably qualified and experienced Auditors.
8. A record shall be maintained, indicating authorization granted to the Auditor who has passed the theoretical training and who have successfully completed the practical training (see paragraph 6 above).
9. A qualified Auditor who has not performed at least two (2) audits in any two (2) calendar year period shall be required to undergo two (2) revalidation audits under the supervision of a suitably qualified and experienced Auditor. These audits may be on ship or Company.
10. A qualified Auditor who has not performed any audits in any five-year period shall be required to undergo revalidation training to include a one-day refresher course and two audits under the supervision of a suitably qualified and experienced Auditor. The one-day refresher course should include familiarization with the latest version of the audit and certification procedures, changes in regulatory requirements, new or updated reporting systems, the most recent guidance on the interpretation and application of the ISM Code, etc. This course may be delivered by alternative learning methods (distance learning, video conference, webinars, etc.).
11. For the update training, ICS Class must ensure that its Auditors are kept informed of all regulatory and procedural developments related to the ISM Code and that they receive guidance on matters of regulatory and procedural interpretation as these evolve.
12. Records shall be created and retained for each Auditor indicating:
 - .1 Qualifications and experience gained prior to training as ISM Code Auditor.
 - .2 Theoretical training received.
 - .3 Examination results.
 - .4 Practical training received.
 - .5 Authorization granted.
 - .6 Update training received.
 - .7 Re-authorization in the event of lapsed authorizations.
13. The performance of the Auditor shall be evaluated at least once every two (2) years.
14. The Procedure PE02-P01 for Training and Qualification of Technical Staff establishes the relevant objectives, requirements and activities for theoretical and practical training of the ISM Code Auditors.