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To:	All ISM Auditors
Applicable to flag:	All Flags
Subject:	ISM Code Amendments
Reference:	IMO Resolution MSC. 273(85)

IMO has adopted a number of amendments to the ISM Code that were entered into force on July 1st, 2010.

During the review of these amendments, this Administration has noticed the need to prepare a Merchant Marine Circular providing additional instructions or clarifications in order to assure the proper implementation of the new requirements.

The most important changes are:

1. Risk Assessment is now explicitly required in the code through the revision of clause 1.2.2.2. Previously, no requirement was included regarding how companies establish safeguards. This revision has prompted questions regarding how companies should respond and what they should do to demonstrate compliance; and how ISM auditors interpret the new requirement as well as what evidence should they look for.

On this respect, IACS has developed guidance for auditors of ISM Code, Clause 1.2.2.2, "**A GUIDE TO RISK ASSESSMENT IN SHIP OPERATIONS**". See attachment to this circular 007. With the purpose to insure proper and common implementation of such requirement, CONARINA instructs all ISM auditors to issue ISM certification based on the above mentioned guidance when verifying compliance with the clause 1.2.2.2 of the ISM Code.

2. The paragraph 12.1 is replaced by the following: "The company should carry out internal safety audits on board and ashore at intervals not exceeding twelve months in order to verify whether safety and pollution prevention activities comply with the safety management system. In exceptional circumstances, this interval may be exceeded by no more than three months".

In regard to exceptional circumstances under which the interval may be extended, it is the company who approves such extension. Therefore, the company should establish the criteria for the extension in the management system.

References: ISM Code

Attachment: "A GUIDE TO RISK ASSESSMENT IN SHIP OPERATIONS "

Kindest Regards,

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