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To: All Surveyors/Auditors

Applicable to flag: All Flags

Differences Between the ISM Code and Subchapter M

Reference: Subchapter M

Similarities and differences between the ISM Code and Subchapter M

Both the ISM Code and Subchapter M state the requirement of a Safety Management System. The major similarity between the ISM Code and Subchapter M is the emphasis on the process of risk assessments and the importance of having a safety management system implemented in the organization.

The ISM code clearly emphasizes the need of having a process for risk assessment in place. This is also stated in Subchapter M, as an element of the Towing Safety Management System (TSMS) and has a section on the identification and mitigation of health and safety hazards.

Subchapter M is more detailed than the ISM Code, as it advises on the steps to be taken in the preparation phase of the towing operation, such as the selection of the appropriate vessel that has adequate maneuverability and horsepower and the selection of appropriate rigging and towing gear.

Further, Subchapter M addresses several high-risk tasks (e.g. confined space entry, working aloft), specific workplaces, high-risk conditions on board and equipment. With this, guidance is given on what type of risk controls should be selected in order to eliminate risks.

One large difference between the ISM Code and Subchapter M should be noted. For vessels that should comply with Subchapter M, it is not necessarily mandatory to implement a safety management system in order to obtain a Certificate of Inspection (COI), whereas this is mandatory for vessels that should be compliant with the ISM Code.

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REFERENCES:

- ISM Code and Subchapter M

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