



Department BSM

# Guidelines for Certification of Safety Management Systems

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# Guidelines for Certification of Safety Management Systems

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## Germanischer Lloyd Aktiengesellschaft

Vorsetzen 35  
20459 Hamburg

Phone +49 40 36149 - 0 (Switchboard)

Direct Fax +49 40 36149 – 200

E-Mail: [ism@gl-group.com](mailto:ism@gl-group.com)

### Marine Management Systems Certification

Name	Department BSM	Phone - Extension
Mr. Olaf Quas	Head of Dept.	-7013
Mr. Ingo Haverkamp	Deputy Head of Dept.	-1547
Mr. Hubert Frik	ISM	-7033
Mr. Fred Geyer	ISM/ISO	-7591
Mr. Reinhold Heller	ILO/STCW	-7931
Mr. Torsten Stenzel	ISM	-7152
Mr. Ralf Trützscher	ISM	-542
Ms. Stephanie Busch	ISM	-309
Ms. Iris Laverentz	ILO/STCW	-7262
Ms. Jessica Schmid	ISM	-7794
Ms. Nicole Westermann	ISM	-6414

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## Section I - Introduction

### 1 General

These Guidelines describe the steps to be undertaken whenever a Company applies for certification of its Safety Management System (SMS) in accordance with the ISM Code (IMO Resolution A.741 (18) as adopted by the IMO Assembly on 4th November, 1993), as amended.

### 2 Scope

These guidelines apply to Companies as defined under item 4.5.

### 3 Reference

- IACS Procedural Requirements No. 9 for the ISM Code Certification
- Guidelines on implementation of the International Safety Management (ISM) Code by Administrations (A.913 (22))
- IACS Guidance to Auditors (Rec. No.41)

### 4 Definitions

For the purpose of these Guidelines, the following definitions apply:

- "Administration" means the Government of the State whose flag the ship is entitled to fly.
- "Audit" means a systematic and independent examination to determine whether the SMS activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives.
- "Auditor" means a person performing verification of compliance with the requirements of the ISM Code and who fulfils the personal qualification and other pertinent requirements contained in IACS Model Course for Training ISM Code Auditors. An Auditor who is authorized to lead a team of two or more Auditors shall be considered as "Lead Auditor".
- "Branch Office" means an office which is part of the Company, under its control and covered by the same Safety Management System (SMS).
- "Company" means the Owner of the ship or any other organisation or person such as the Manager, or Bareboat Charterer, who has assumed the responsibility for operation of the ship from the Ship-owner and who on assuming such responsibility has agreed to take over all the duties and responsibilities imposed by the ISM Code.
- "Document of Compliance (DOC)" means a document issued to a Company which complies with the requirements of the ISM Code.
- "International Safety Management (ISM) Code" means the International Management Code for the Safe Operation of Ships and for Pollution Prevention, adopted by the International Maritime Organisation by Assembly Resolution A.741 (18) as amended.
- "Major non-conformity" means an identifiable deviation which poses a serious threat to personnel or ship safety or a serious risk to the environment and requires immediate corrective action. In addition, the lack of effective and systematic implementation of a requirement of the ISM Code is also

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- considered as a major non-conformity.
- "Non-conformity" means an observation where objective evidence indicates the non-fulfillment of a specified requirement.
  - "Objective evidence" means qualitative or quantitative information, records or statements of fact pertaining to the existence and implementation of a SMS element, which is based on observation, measurement or test and which can be verified.
  - "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 the SMS which, if not corrected, may lead to a non-conformity in the future.
  - "Safety Management Certificate (SMC)" means a document issued to a ship which signifies that the Company and its shipboard management in accordance with the approved Safety Management System (SMS).
  - "Safety Management Manual (SMM)" is the documentation used to describe and implement the Safety Management System.
  - "Safety Management System (SMS)" means a structured and documented system enabling Company personnel to effectively implement the Company safety and environmental protection policy.
  - "Technical Deficiency" means a defect in, or failure in the operation of, a part of the ship's structure or its machinery, equipment or fittings.
  - "FPSO" means a Floating Production Storage and Offloading Unit
  - "FSU" means a Floating Storage Unit

## 5 Responsibilities

### 5.1 Germanischer Lloyd

- provides competence with rules and regulations to which companies have to ensure compliance
- undertakes to treat confidentially any information and documentation provided by a Company,
- Head Office assigns qualified Auditors (in special cases Lead Auditors),
- monitors ongoing assessment processes,
- reviews reports from audit team and satisfies itself that all applicable requirements of the Code have been complied with,
- ensures that the certification process is performed according to these guidelines and relevant flag state requirements and includes management control of all aspects of the certification,
- issues and forwards certificates to a Company,
- reserves the right to perform follow-up audits at shorter than regular intervals, if deemed necessary by GL,
- assists in evaluating a major non-conformity alleged by Port State Control (PSC) when requested by the Administration or the company, (Section II - CERTIFICATION PROCEDURES / 3.3.1).

When performing verification of compliance with the provisions of the ISM Code, Germanischer Lloyd ensures that independence exists between personnel providing consultancy services and those providing the certification.

### 5.2 The Company

- ensures that all relevant information, issued under the provisions of the statutory conventions and class rules to which the ship is certified and classed by any IACS Class Society, is provided to GL,
- informs GL of any relevant changes in management, flag or class of its ships, and any other developments resulting in major changes of their Safety Management System,
- informs GL if any ship type identified on the DOC is out of operation exceeding the period of one year,

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- notifies GL of due dates for periodical, renewal and additional audits in advance,
- nominates person(s) to liaise with the Auditor,
- agrees with the Auditor on time schedule for execution of shore and shipboard audits,
- co-operates with the Auditor(s), to permit the audit objectives being achieved,
- informs employees about the objectives and scope of the ISM Code audit,
- appoints responsible members of staff to accompany the audit team,
- provides all resources needed for the audit team in order to ensure an effective and efficient assessment process,
- provides access and evidential material as requested by the Auditors,
- maintains audit report records of all audits performed both ashore and aboard ship for a reasonable time, determines and initiates corrective actions based on the audit report,
- provides its ships with valid copies of Document of Compliance,
- resubmits ISM certificates which become invalid for any reason

## 5.3 Auditor

The Auditor is responsible for:

- preparing the audit plan,
- complying with the applicable requirements and other appropriate directives,
- communicating and clarifying the non-conformities to the Company and/or the ship immediately,
- planning and carrying out assigned responsibilities effectively and efficiently,
- reporting the audit results clearly, conclusively and without undue delay,
- submitting the audit report to the Company and/or the ship,
- reporting any major obstacles encountered in performing the audit,
- communicating any observations,
- verifying the effectiveness of corrective actions taken by the Company as a result of the audit,
- co-operating with and supporting the Auditor/Lead Auditor (if the audit is performed by a team),
- organizing specialist technical assistance required to fulfill the competence requirements of the audit as and when appropriate,
- ensuring confidentiality of documents pertaining the certification and treating privileged information with discretion,
- encouraging companies to adopt recommended guidelines and standards developed by the IMO, Administrations and classification societies into their SMS

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## Section II - Certification Procedures

### 1 Application for Verification

A Company seeking for certification should contact Germanischer Lloyd Head Office (Ship Safety Division) or one of its local offices for necessary information, a questionnaire and an application form.

Together with the completed application form and the questionnaire the Company has to:

- communicate the names of its designated person(s),
- provide general information about its organization, including information about DOC's held by the Company,
- submit its Safety Management Manual and number of each ship type covered by it.
- Upon evaluation of questionnaire and application form GL will offer to undertake certification of the Company.

### 2 SMS Documentation

The SMS Documentation shall include at least the following:

- a statement by the management on their safety and environmental protection policy and objectives,
- a declaration by the management as to the obligation of each member of the company to follow the policy, instructions and procedures described in the Safety Management Manual,
- an enforcement date and signature(s) by the management,
- organization chart,
- responsibility and authority of the person(s) in charge of the SMS and their qualifications,
- a description of all activities of SMS management and quality assurance concerning all elements of the ISM Code,
- description of documented procedures for the various areas of the Company,
- cross references to instructions and procedures belonging to the SMS,
- SMS related supervision and internal auditing.
- See also 4.3 (Interim Document of Compliance)

### 3 Verification

#### 3.1 Types

##### 3.1.1 Assessment of Application

Upon receipt of the application GL will examine the application for feasibility in connection with the SMS documentation submitted. This activity may include an initial visit to the Company to verify commitment to apply the developed documentation and assignment responsibility.

##### 3.1.2 Initial Verification, Company

This assessment comprises document review and Company audit leading to the issuance of a DOC.

It shall be ensured that a company does not hold more than one valid DOC issued by an IACS member for the same ship type under a given flag.

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## 3.1.3 Document Review

The purpose of the document review is to verify that the documented SMS complies with the requirements of the ISM Code. The documentation will be assessed by the Auditor nominated by GL for completeness and compliance with the requirements of the ISM Code.

In case the documents submitted are not in full compliance with the requirements of the ISM Code, the Company shall re-submit the revised documentation and the audit may have to be delayed. Where appropriate amendments made to the documented SMS to correct deficiencies, they may be verified during the subsequent company audit described below.

## 3.1.4 Company Audit

The purpose of the Company Audit is to verify the effective functioning of the SMS, including objective evidence that the Company's SMS has been in operation for at least three months and at least three months on board at least one ship of each type operated by the Company. The objective evidence should also include records from the internal audits performed by the Company, ashore and on board, and examining and verifying the correctness of the statutory and classification records presented for at least one ship of each type operated by the Company.

The first Internal Audit should be carried out before external initial audit and after that continuously on an annual basis.

The verification of compliance with the ISM Code does not relieve the Company, the Master or any other entity or person involved in the management or operation of the company or ship of their responsibilities.

## 3.1.5 Initial Verification, Ship(s)

This verification comprises verification that the Company's DOC is relevant to that ship and the shipboard audit (leading to the issuance of a SMC).

### 3.1.5.1 Verification of copy of DOC on board

Verification that the DOC is relevant to the ship type is carried out on board to confirm its applicability to that particular type of ship as well as the date of validity of DOC and the requirements of paragraph 4.2 of these Guidelines are complied with. Only after confirmation of a valid DOC for the particular ship-type / flag the audit can proceed. If the Company already holds a valid DOC, issued by another IACS Member Society, this DOC is to be accepted as evidence of compliance with the ISM Code, unless there are clear grounds to believe otherwise. If the issuance of the SMC is carried out on behalf of the Administration, instructions from the Administration are to be followed whether to recognize the DOC issued by another Administration.

### 3.1.5.2 Shipboard Audit

The purpose of the shipboard audit is to verify the effective functioning of the SMS, including objective evidence that the SMS has been in operation for at least three months onboard the ship.

The objective evidence should also include records from the internal audits performed by the Company. First Internal Audits should be carried out before external initial audit and after that continuously on an annual basis.

The objective evidence should also include records from the internal audits performed by the Company. Shipboard audits may include a review of the relevant SMS documentation on board, on a random basis. The verification of compliance with mandatory rules and regulations neither duplicates nor substitutes surveys for other maritime certificates. The verification of compliance with the ISM Code does not relieve the Master or any other entity or person involved in the management or operation of the ship of their responsibilities.

The shipboard audit, either for initial, intermediate or renewal verification, shall only be performed under normal operating conditions, e.g. when the ship is not in dry dock or laid up and fully manned in accordance with its Safe Manning Certificate. Pre-audits for issuance of an Interim SMC may be conducted in circumstances other than under normal operating conditions, provided that the ship is manned in accordance with its Safe Manning Certificate.

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## 3.1.6 Periodical Verification

Periodical safety management audits are to be carried out to maintain the validity of the DOC and/or SMC. The purpose of these audits is to verify:

- the effective functioning of the SMS;
- that possible modifications of the SMS comply with the requirements of the ISM Code;
- that corrective action (necessary for settlement of Non-Conformities found during prior audits) has been effectively implemented, and
- that statutory and classification certificates are valid and no surveys are overdue.

Verification of the statutory and classification certificates is to be carried out on or for at least one ship of each type identified on the DOC.

Periodical verification for the DOC is to be carried out within three months before and after the anniversary date of the DOC (annual office audit).

Periodical (intermediate) verification for the SMC is to be carried out between the second and third anniversary date of the SMC (intermediate shipboard audit) if only one periodical audit is carried out.

## 3.1.7 Renewal Verification

A DOC and/or SMC renewal verification shall be carried out from six months before the expiry date of the certificate and shall be completed before the expiry date.

DOC and/or SMC renewal verification shall be carried out according to the same principles as for the initial verification, including all elements of the SMS and the effectiveness of the SMS in meeting the requirements of the ISM Code.

Document review shall be part of the renewal verification should modifications to the Company and/or shipboard SMS have taken place.

## 3.1.8 Additional Verification

### 3.1.8.1 Additional Audits shall be carried out onboard vessels:

- as a result of a Port State Control inspection by a Port State Control Officer (PSCO) of a Contracting Government
- as a result of a downgraded Major Non-Conformity, at least one additional audit should be carried out within the time frame indicated in the agreed corrective action plan to verify that effective actions are taken
- in case of evidence that the SMS is not sufficiently implemented
- to confirm modification(s) of the SMS
- if required by the flag State or GL
- during "Change of Flag" (CoF, only if requested by flag state Administration)

Where Non-Compliance or Failures have been alleged by the PSCO due to the ship failing to meet the requirements of SOLAS Chapter IX (ISM-Code) on ships holding a valid SMC issued by GL, a GL Auditor upon request by the company / administration will consider the objective evidence presented by the PSCO and perform an additional audit for further verification at site. Should the Auditor find the existence of the Non-Compliance or Failures still confirmed he shall issue a (Major) Non-Conformity which have to be followed by the respective procedures according to Section 3.3.1. of „Guidelines for Certification of Safety Management Systems“. The Audit Report to be made up with reference to the PSC-Report as detailed as practicable.

In cases of disagreements between PSCO and the Auditor about the evidence for the existence of Non-Compliance or Failures, the authorities of the port will decide what further action has to be taken. Any disagreements with the actions taken by the PSCO / authorities shall be documented by the Auditor and forwarded to the Flag State Administration (refer also to Instructions for Office and Shipboard Audits)

- To verify implementation of corrective action(s) described for (Major) Non-Conformity(ies) identified at

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external audits (initial, intermediate, additional or renewal audit)

Whenever a Major Non-Conformity is detected the Auditor shall decide on the scope and date of an additional audit. The corrective action for major non-conformity(ies) shall be taken immediately (refer to 3.3.1 and 4.2 of the "Guidelines for the Certification of a Safety Management System"). An additional audit may also be required due to the number and nature of Non-Conformities issued. The acting auditor or GL H.O. have to decide the scope and time frame.

- To confirm modification(s) of the SMS

Additional audits may be performed to confirm modification(s) of the SMS. The scope depends on the nature of modification(s).

- If required by the flag State or GL

The flag state administration or GL may request the company to agree on an additional audit at any time. The scope of audit will be decided by the flag state administration or GL H.O.

- During "Change of Flag" (CoF)

An additional audit may be performed during a "Change of Flag" in order to verify the national ISM requirements for the new flag state (see Chapter 6 of ITS) or special instructions to be received by GL H.O.

## 3.1.8.2 Additional Audits shall be carried out in the office:

- as a result of a downgraded Major Non-Conformity, at least one additional audit should be carried out within the time frame indicated in the agreed corrective action plan to verify that effective actions are taken
- in case of evidence that the SMS is not sufficiently implemented
- to verify implementation of corrective action(s) described for (Major) Non-Conformity(ies) identified at external audits (initial, intermediate, additional or renewal audit)
- to confirm modification(s) of the SMS
- if required by the flag State or GL
- when a company requests a DOC for new flag or new type of vessel

To verify implementation of corrective action(s) described for (Major) Non-Conformity(ies) identified at external audits (initial, intermediate, additional or renewal audit)

Whenever a Major Non-Conformity is detected the Auditor shall decide on the scope and date of an additional audit. The corrective action for major non-conformity(ies) shall be taken immediately (refer to 3.3.1 and 4.1 of the "Guidelines for the Certification of a Safety Management System"). An additional audit may also be required due to the number and nature of Non-Conformities issued. The acting auditor or GL H.O. have to decide the scope and time frame.

- To confirm modification(s) of the SMS

Additional audits may be performed to confirm modification(s) of the SMS. The scope depends on the nature of modification(s).

- If required by the flag State or GL

The flag state administration or GL may request the company to agree on an additional audit at any time. The scope of audit will be decided by the flag state administration or GL-HO.

- When a company requests a DOC for new flag or new type of Vessel

An additional audit may be performed when a company takes over the responsibility for the management of a ship type not yet covered by an existing DOC in order to verify amendments to the SMS and SMM for the respective ship types or when a ship changes flag to a flag state not yet covered by an existing DOC. Additional flag state requirements are to be verified for the new flag state.

**Instructions for Additional Audits will be given by GL - Head Office as necessary if time and circumstances allow.**

Nevertheless, the above said and in any case, when an Additional Audit has to be performed, the auditor shall pay special attendance to the preparation, planning, performance and reporting for such audit.

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Before an additional audit, the attending auditor shall prepare himself by collecting all available information. This shall include inter alia: PSC-reports, previous audit reports incl. Non-Conformity Notes, correspondence between the company and GL or SMM for respective company/vessel. After having prepared himself, the auditor shall plan and perform the audit with adequate reference to the cause for this audit. The time of an additional audit shall be agreed with the company, vessel's command, PSCO etc. The audit scope, audit schedule and the auditees are at the discretion of the auditor (if not otherwise stipulated) but shall be suitable, practicable and adequate. All important details reflecting the contents and findings of an audit shall be included in the audit report considering the cause for the additional audit.

Special attention shall be given to additional audits resulting from PSC inspections

## 3.1.9 Re-Activation audit ship(s)

Should a ship be laid up or otherwise out of service for a period of more than three months but less than 12 months since it has last been engaged in its normal operations as the ship type indicated on its SMC, then a re-activation audit shall be performed, unless the following becomes a normal part of ship's routine and is described by company's procedures:

- economic fluctuations, the particular patterns of trade leading to long periods at anchor awaiting cargo
- seasonal factors requiring small passenger ships to be out of service during off season.

A ship is considered to be out of service when the manning is reduced to a level below that indicated in the Safe Manning Certificate leading to reduced safety management activities with respect to maintenance of the ship and its equipment, and the conduct of drills and exercises.

The scope of such audit is defined as follows:

- If a renewal or periodical verification falls due during the period out of service, or the date of re-activation falls within the window of one of these routine verifications, then the routine verification should serve as the re-activation audit.
- If the situation described above does not apply, then a re-activation audit should be conducted with the scope of a pre-audit, plus a verification of compliance with the requirements of element 3, 4, 5, 6, and 10 of the ISM Code.

The Company is requested to immediately notify GL when ships operated under their management are out of service exceeding 3 months.

## 3.1.10 Company Branch Office Verification

### 3.1.10.1 General

Where a Company assigns SMS responsibilities to Branch Offices the verification shall include a representative sample of those Offices, such that the sample includes all appropriate Offices necessarily cover each requirement of the ISM-Code. The audit of each Branch Office shall address each requirement of the ISM Code relevant to that Office. The Company shall have performed internal audits of all Branch Offices and relevant records shall be made available to the Auditor(s). Where the Company assigns SMS responsibilities to Branch Offices, the list of Branch Offices shall be indicated in the DOC as an attachment.

### 3.1.10.2 Initial DOC Verification

Where the same activities are performed by all Branch Offices, the number of Branch Offices to be verified is:

- two if the total number of Branch Offices is two or three;
- three if the total number of Branch Offices is from four to six; and
- to be agreed on a case by case basis if the total number of Branch Offices is more than six.

Where different activities are performed by Branch Offices the number of Branch Offices performing the same activities to be verified is:

- two if the total number of Branch Offices performing the same activity is two or three;
- three if the total number of Branch Offices performing the same activities is from four to six;

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- to be agreed on a case by case basis if the total number of Branch Offices performing the same activities is more than six.

Notwithstanding the above, if a Company nominates an office as its Head Office then it will always be audited as part of the initial verification.

### 3.1.10.3 Periodical DOC Verification

Periodical verification shall ensure that all Branch Offices are visited during the period of validity of the DOC.

If an additional Branch Office is included by the Company in its SMS during the period of validity of the DOC, it shall be verified at the next periodical verification. The additional Branch Office shall be included in the DOC, when the DOC is endorsed.

### 3.1.11 Additional Office verification due to change of company address (company name)

The scope of the verification is to verify the new address of company.

Following steps are to be undertaken:

- Is it ensured that the company can provide shore based support for Emergency Response as required by their SMS
- SMM have been amended if necessary due to the new address
- Any other changes have been made to the SMM
- Changes to SMM have been distributed to the vessels allowing GL to re-issue the SMCs
- Are any changes in the company's organization / personnel caused by the change of address?
- Have the flag state administrations been informed about the new address as per ISM-Code 3.1?
- The ISM Office Audit Report (add. Audit) has to be used only to give comments to the items above
- GL-HO/BSM will then re-issue existing DOCs / SMCs

## 3.2 Performance

### 3.2.1 Company and Shipboard Verification

#### 3.2.1.1 Preparation

##### 3.2.1.1.1 Audit Team

GL assigns an auditor or audit team where necessary.

Auditors taking part in a certification process shall not be involved in consulting services concerning the establishment and implementation of the SMS of the Company.

##### 3.2.1.1.2 Audit Plan

The Auditor will prepare an audit plan in co-operation with the Company/Ship's management.

The audit plan should be designed to be flexible in order to permit changes in emphasis based on information gathered during the audit, and to permit effective use of resources. This plan should be agreed between the auditor and the Company's / Ship's management and communicated to those involved in the audit. The audit plan shall include:

- identification of the individuals or organizational units having significant direct responsibilities regarding the SMS,
- identification of Auditor(s),
- the language of the audit,
- the date and place where the audit is to be conducted,
- the schedule of meetings to be held with Company/Ship's management,

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## 3.2.1.2 Opening Meeting

Upon the Auditor's arrival on the Company's premises or on board, a meeting with the management or the master and designated person(s) (if applicable) is to be convened prior to the start of the audit.

The purpose of the opening meeting is to:

- introduce the Auditor(s) to the Company's and / or ship's management,
- explain the scope and objective of the audit,
- provide a short summary of the methods and procedures to be used to conduct the audit,
- establish the official communication line between the Auditor and the Company and / or the ship,
- confirm that resources, documentation and facilities needed to perform the audit are available,
- confirm the time and date of the closing meeting and any possible interim meetings,
- quote the disclaimer.

## 3.2.1.3 Collection of Objective Evidence during audits.

The Auditor will check by means of interviews with personnel and on the basis of documentation presented whether the SMS is implemented at all relevant levels. Observations of activities and conditions may also be included when necessary to determine the effectiveness of the SMS. All audit observations should be documented in a clear, concise manner, supported by objective evidence. These shall be reviewed by the Auditor(s) in order to determine which are to be reported as Major Non-Conformities, Non-Conformities or Observations.

Non-Conformities and Major Non-Conformities shall be identified and reported in terms of the specific requirements of the ISM Code and paragraphs of the Safety Management Manual.

Working documents may be used by the Auditor to facilitate the audit and to document the results, which may include:

- verification lists used for evaluating SMS elements,
- forms for reporting observations and documenting supporting evidence.

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

## 3.2.1.4 Corrective actions on previous Non-Conformity Notes

During annual or renewal Office audits of the company, the Auditor will review Non-Conformities reported in relation to previously conducted internal / external company and ship audits. By selecting a sample of the reported Non-Conformities, the Auditor shall verify the company's investigation, analysis and resolution of the Non-Conformities according to the requirements of element 9 and 12 of the ISM Code (refer also to 3.3).

## 3.2.1.5 Closing Meeting

At the end of the audit, prior to preparing the audit report, the Auditor is to hold a meeting with the senior management of the Company/or ship and those responsible for the functions concerned. The purpose is to present Major Non-Conformities, Non-Conformities and Observations to the Company's and / or Ship's management, in such a manner as to ensure that they clearly understand the results of the audit.

## 3.2.1.6 Audit Report

The written audit report is to be accurate and complete, reflecting the content of the audit. It is to be prepared under the responsibility of the Auditor / Lead Auditor, who is responsible for its accuracy and completeness based on the information provided by the audit team. The audit report is to include the following items, as applicable:

- the date of completion of the audit,
- the scope and objectives of the audit,
- audit plan (including a list of personnel interviewed / crew list),
- recommendation for issuance of certificate or not,
- all Major Non-Conformities, Non-Conformities and Observations.

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## 3.2.1.7 Distribution of Audit Documents

Copies of all audit documents and the original of the short term certificate are to be submitted to the Company / Master. In line with existing procedures for survey reporting, all original ISM documents shall be filed with the inspection Office (GL Station carrying out the ISM audit). A complete set of ISM audit documents (signed and stamped) shall be sent by e-mail or by fax to GL-HO/Department BSM. All these documents shall be forwarded within 24-hours after completion of the audit and Non-Conformity Notes as soon as Corrective Action is available and accepted by the auditor. Germanischer Lloyd Head Office will forward copies of the relevant audit documents to the Administration, if so requested.

Audit documents (Report, NCNs, Observations, Certificates) have to be maintained for a reasonable time by the company (as a minimum, for each audit the audit documents from the previous audit must be available).

## 3.2.2 Decision on Certification

GL Head Office will assess the audit documentation and finally decide on the issuance of a certificate. If certification is not granted, the Company may need to take appropriate corrective action. GL-HO will re-verify the system as considered necessary.

The certificate will be valid from the date of completion of the audit.

## 3.3 Non-Conformities and Corrective Actions

The Company is responsible for determining and initiating corrective actions for any non-conformity identified by the Auditor(s). Such proposed corrective action is to be verified as effective by the Auditor(s) and should be completed within the time period agreed.

A non-conformity note is the record by which Auditors report deviations from the ISM Code and/or specific requirements of the SMS. The purpose of the non-conformity note is:

- to formally convey to the Company the Auditor's observations,
- to advise another Auditor of what has been found and in which area, to facilitate review,
- to present a record that can be reviewed remotely.

The content of a non-conformity note has to:

- be complete and concise, containing a reference to a requirement of the SMS,
- be classified against the respective requirement of the ISM Code,
- be written in such a manner to be easily understood by a second party reviewing the report

### 3.3.1 Major Non-Conformities

A major non-conformity found during an audit may be downgraded to a non-conformity if the Administration or recognized organization (Auditor) is satisfied that effective corrective action is being taken. The corrective action for major non-conformity(ies) shall be taken immediately. This shall be adequate to remove the serious threat to personnel or ship or a serious risk to the environment. A major non-conformity raised on a ship should be downgraded before the ship sails. A schedule not exceeding three months should be agreed for completion of the necessary corrective actions. Where the Administration or recognized organization (Auditor) allows a major non-conformity to be downgraded, at least one additional audit should be carried out within the time frame indicated in the agreed corrective action plan to verify that effective actions are taken. Depending on the number of major non-conformities, non-conformities and observations found, the Auditor(s) shall decide the extent, type and time period for the additional verification.

The Auditor(s) shall also advise the Company of the procedure for withdrawal of the DOC / SMC or rejection to issue the DOC / SMC (as per item 4.1 and 4.2 of these Guidelines), if necessary.

Steps to be completed after a major non-conformity has been identified:

- Immediate and adequate correction must be given by the company or the master to remove the serious threat to personnel or ship or a serious risk to the environment.
- If the immediate correction is acceptable to the auditor, a major non-conformity may be downgraded to non-conformity.

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- Additional audit is required after major non-conformities and/or depending on the number of non-conformities including observations found. The Auditor(s) shall decide the extent, type and time period for the additional verification.
- The company shall carry out a root cause analysis of the problem and based on these results corrective action / preventive measures shall be given to avoid reoccurrence.
- During the additional audit objective evidence shall be given that efficient actions are taken and implemented effectively.

## 3.3.2 Non-Conformities

Where a large number of Non-Conformities exists in an area or where a number of similar Non-Conformities exist throughout the Company, the Auditor(s) shall consider whether these demonstrate a more significant breakdown or failure of the management system. In that case a separate major non-conformity note shall be issued to address this subject.

## 3.3.3 Technical deficiencies

Where the Auditor(s) identifies a technical deficiency during a shipboard audit, which is likely to present a serious threat to safety or harm to the environment, he shall verify if the company has taken appropriate action to correct the technical deficiency and if the responsible Class Society has been informed accordingly. In any case the Auditor shall ensure that technical deficiencies found are dealt with by the responsible Class Society by using the communication procedures described in section 3.3.4 of these guidelines.

Provided the technical deficiency constitutes or is symptomatic of a non-conformity / major non-conformity within the company's SMS, the requirements of sections 3.3 and 3.3.1 shall be followed by the Auditor.

## 3.3.4 Communication with Flag States & other IACS Societies

Should other IACS Societies be involved in the ISM certification process besides GL, e.g. the DOC and SMC's are issued by different Societies or SMC's are issued by various Societies besides GL, relevant information should be exchanged among the IACS Class Societies in case:

- The Auditor needs to acquire the information he needs from other parties involved in order to check the veracity of the information presented to him by the company.
- The Auditor needs additional information for verification such as audit results / corrective action implementation from other shipboard or company audits.
- The Auditor has reasons to pass on relevant audit results to other societies involved in the certification process.

Should Major Non-Conformities be identified in a shipboard audit / company audit leading to the invalidation of the SMC / DOC, the following specific communication procedure must be followed by using the Form (F 581E). All flag states of which the company is holding a valid DOC shall be informed. This communication (notification) must be copied to all the Class Society(s) responsible for carrying out the audits of the company / ships and to the company's representatives. In case where one or more of these Class Society(s) or ROs are not identifiable or are not an IACS Society, the flag Administration is to be requested to forward a copy to the relevant ROs.

The communication has to include the identity of the ship / company and the substance of the major nonconformity as well as the date of audit.

The IACS Society identifying a major non-conformity during the SMC audit which was downgraded shall notify the ROs or flag Administration issuing the DOC. In cases where one or more of these ROs are not identifiable or are not an IACS Society, the flag Administration is to be requested to forward a copy to the relevant ROs.

In case technical deficiencies are identified during a shipboard audit (please refer to 3.3.3 above), the Auditor shall inform the society having the vessel in class via GL Head Office in writing."

## 3.3.5 Responsibilities

Auditors are responsible for maintenance of original non-conformities after the audit. They are responsible

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for ensuring the follow-up / verification of corrective actions of non-conformities which have been implemented.

## 3.3.6 Presentation of Non-Conformities

Non-Conformities shall be passed to the Company Representative for acceptance during the audits. If the Company Representative refuses to sign, the non-conformity shall be annotated with the stated reason and shall be continued to be treated as if a signature of acceptance was present.

At the closing meeting, the non-conformity notes shall be formally presented by the Auditor(s). The Company / Master shall retain copies, while the originals are forwarded to and retained by the Auditor.

## 3.3.7 Review of Non-Conformities

Demonstration of immediate and effective partial or complete corrective actions shall allow a major non-conformity to be downgraded to a non-conformity. Verification of the corrective actions shall also demonstrate that similar problems have been identified in other areas or on other ships.

During preparation of the Audit Report by the Auditor, the latest copies of all non-conformities shall be included in the Appendix.

Non-conformities not effectively addressed by the Company at the next periodical verification audit shall lead to invalidation of certification due to upgrading the non-conformities to major non-conformities.

## 3.3.8 Port State Control (PSC)

Where major non-conformities are alleged by the Port State Control Officer (PSCO) on ships holding a valid SMC issued by GL, a GL Auditor upon request by the company / administration will consider the objective evidence presented by the PSCO. In cases where the Auditor confirms the assumption of a major non-conformity, GL will notify the company and request corrective action. Upon request by the company / administration the Auditor will perform an additional audit for further verification at site. Should the Auditor find the existence of the major non-conformity still confirmed - not being able to downgrade to a non-conformity, he shall issue a major non-conformity following the procedures for major non-conformities being identified during routine audits (refer to 3.3.1).

In cases of disagreements between PSCO and the Auditor about the evidence for the existence of a major non-conformity, the authorities of the port will decide what further action has to be taken. Any disagreements with the actions taken by the PSCO / authorities shall be documented by the Auditor and forwarded to the Flag State Administration (refer also to Instructions for Office and Shipboard Audits)

## 4 Certification

### 4.1 Document of Compliance

A DOC shall be issued to a Company following an initial verification of compliance with the requirements of the ISM Code.

The Company shall make available copies of the DOC to its shore side offices and to each ship.

A DOC shall not be issued, endorsed or renewed unless all major non-conformities have been:

- a) downgraded, i.e. successfully dealt with after immediate corrective action to remove serious threat to personnel or ship or a serious risk to the environment.
- b) closed out, i.e. fully rectified by the company and this being verified by the Auditor.

A DOC may be issued, endorsed or renewed before Non-Conformities have been closed out, provided that a schedule not exceeding three months has been agreed between the Company and the Auditor(s) for completion of the necessary corrective actions. The period of validity of a DOC shall be five years, subject to annual periodical verification carried out within three months before or after the anniversary date. A DOC is valid for the types of ships on which the initial verification was based. The types of ships shall be listed in the DOC. The scope of a DOC may be amended to cover an additional type of ship after the verification of the Company's capability to comply with the requirements of the ISM Code for this type (refer to the issuance of Interim DOC).

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Any Company Branch Offices taking over Safety Management responsibilities shall be listed in the List of Branch Offices attached to the DOC (for details refer to 3.1.9).

Reasons for which a DOC may become invalid include:

- corrective actions (external audits) are not completed within the agreed time schedule;
- a periodical verification is not requested;
- amendments to the ISM Code are not taken into account; or
- there is evidence of an existing major non-conformity;
- no evidence that internal audits have been carried out (i.e. ISM-Code 14.4.3 and IMO Res. A.913(22) 3.2.6.2);
- the company is not operating vessels under a flag, for which a DOC has been issued, for a period exceeding more than one year

The DOC may become invalid for an identified ship type, should the company not operate this ship type for a period exceeding one year. Upon receipt of the required advise from the company, the DOC shall be re-issued, no longer listing this particular ship type.

GL having reasons to withdraw a DOC, when acting on behalf of an Administration, shall apply the following procedure:

- GL is authorized by Administration to withdraw a DOC:
  - submit a written notice (Form F 581) to the Company, Administration, Port State and GL Head Office that the DOC has been withdrawn;
  - request surrender of DOC;
  - closely liaise with parties involved for further actions to be taken.
- GL is not authorized by Administration to withdraw DOC:
  - submit a written notice (Form F 581) to the Company, Administration, Port State and GL Head Office stating that the DOC should be withdrawn giving the reasons for possible withdrawal;
  - await advise from Administration on further actions to be taken.

Invalidation of a DOC shall result in the invalidation of the ship's SMC(s) associated with the DOC.

A DOC shall be reinstated upon satisfactory completion of an audit having the scope of an initial verification.

## 4.2 Safety Management Certificate

A SMC shall be issued to a ship following an initial verification of compliance with the requirements of the ISM Code. A copy of the SMC shall be available at the Company's Head Office.

The issue of a SMC is conditional upon:

- the existence of a full (not interim) valid DOC for that type of ship / flag of ship,
- maintenance of compliance with the requirements of a classification society meeting the requirements of IMO Resolution A.739(18) or with applicable national standards of an Administration which provide equivalent level of safety;
- maintenance of valid statutory certificates.

A SMC shall not be issued endorsed or renewed unless all Major Non-Conformities have been:

- downgraded, i.e. successfully dealt with after immediate corrective action to remove serious threat to personnel or ship or a serious risk to the environment.
- closed out, i.e. fully rectified by the company and this being verified by the Auditor.

A SMC may be issued, endorsed or renewed before other Non-Conformities have been closed out, provided a schedule not exceeding three months has been agreed between the Company and the Auditor for completion of the necessary corrective actions.

The period of validity of a SMC shall be five years, subject to at least one intermediate verification. The frequency of the intermediate verification may be increased in certain cases, particularly during the initial period of operation of the SMS or due to the nature of Non-Conformities, if requested by the Administration or by GL. If only one intermediate verification is carried out, it has to take place between the second and

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third anniversary date of the issue of the certificate.

Reasons for which a SMC may become invalid include:

- any condition as outlined above is not met;
- corrective actions (external audits) are not completed within the agreed time schedule;
- a periodical verification is not requested;
- amendments of the ISM Code are not taken into account;
- there is evidence of an existing major non-conformity;
- no evidence that internal audits have been carried out (i.e. ISM-Code 14.4.3 and IMO Res. A.913(22) 3.2.6.2);
- ship out of service exceeding one year

GL having reasons to withdraw a SMC, when acting on behalf of an Administration, shall apply the following procedure:

- GL is authorized by Administration to withdraw SMC:
- submit a written notice (Form F 581E) to the Master, Administration, Port State and GL Head Office stating that the SMC has been withdrawn;
- request surrender of SMC;
- closely liaise with parties involved for further actions to be taken.
- GL is not authorised by Administration to withdraw SMC:
- submit a written notice (Form F 581E) to the Master, Administration, Port State and GL Head Office stating that the SMC should be withdrawn giving the reasons for possible withdrawal;
- await advise from Administration on further actions to be taken.

A SMC shall be reinstated upon satisfactory completion of an audit having the scope of an initial verification.

## 4.3 Interim Document of Compliance

An interim DOC, valid for no more than 12 months may be issued to facilitate implementation of the ISM Code where compliance with the ISM-Code is a new requirement or where changes to the company's organization or its operations have rendered the existing certification inappropriate. This could apply where a Company is newly established, where new ship types are added to an existing DOC or where a ship changes flag. The Interim DOC may be issued following a demonstration at the company's premises, under the following conditions:

The documented SMM is to address all elements of the ISM-Code at least to the following extent:

- S+E Policy
- Organizational Charts of the Company
- Responsibilities and Authorities of key personnel incl. DP and Masters
- Procedures covering Element 8 of the ISM Code
- Procedures covering Element 9 of the ISM Code
- Procedures covering Element 11 of the ISM Code
- Procedures covering Element 12 of the ISM Code
- Master list of intended plans and procedures for:
- Shipboard Operations (Element 7)
- Emergency Preparedness (Element 8)
- Maintenance (Element 10)
- Resources and Personnel (Element 6)
- The company must demonstrate precise plans to implement an SMS throughout the organization and its fleet, meeting the full requirements of the ISM Code within the period of validity of the interim DOC. These demonstrations may include interviews at regular intervals with key personnel ashore in order to assess familiarity with the above

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- GL may verify the progress of implementation at intervals during the validity of the Interim DOC.

## 4.4 Interim Safety Management Certificate

An Interim SMC valid for no more than 6 months may be issued to enable a ship to operate and accumulate objective evidence of the effective functioning of the SMS. The Interim SMC may be issued to a new ship on delivery, ships which are new to the company or when a company takes over the responsibility for the management of a ship type not yet covered by an existing DOC. It may also be issued where a ship changes flag.

Before an interim SMC is issued, it has to be verified by audit that:

- the DOC, or interim DOC, is relevant to that ship;
- the SMS provided by the company on board addresses all elements of the ISM Code to the extent outlined under 4.3 and has been demonstrated for issuance of the interim DOC or has been assessed during document review prior to the audit for issuance of the DOC.
- the Master and relevant Senior Officers are familiar with the SMS and the planned arrangements for its implementation;
- instructions which have been identified as essential to be provided prior to sailing have been given. This would require at least that:
  - Muster list and stations and individual emergency duties are known
  - Alarm signals are known
  - Allocation and use of safety equipment (incl. personal protection equipment) is known
  - Escape routes are known
- plans for Company audit of the ship within three months exists;
- the relevant information on the SMS is given in working language or languages understood by the ship's personnel.

Any deficiencies are to be reported as Observation Notes.

In special cases, the period of validity of the Interim SMC may be extended by a further six months. An initial shipboard audit shall be carried out prior to issuing the full term SMC.

## 4.5 Short Term Certificates

A short term DOC or SMC valid for no more than 5 months from the day of the audit may be issued after the closing of an audit to facilitate implementation of the ISM Code and to cover the period until a full term certificate is issued. The short term DOC or SMC may be issued provided:

- no major non-conformity remains
- the vessel's Flag Administration has no objections
- the Auditor formally recommends certification of the company or ship on the audit report.

The validity of the full term DOC or SMC will be 5 years from the date of the ISM Code audit.

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## 5 Relationship between ISM Code and STCW

There is a direct relationship defined between ISM and STCW'95 in the following Elements of the ISM Code:

- Element 6: Resources and Personnel
- Element 7: Development of plans for shipboard operations
- Element 8: Emergency Preparedness

Throughout all of the above elements the company is required to set into practice all implicit and explicit responsibilities resulting from STCW'95 Reg. 1/14 respectively training, personnel management, familiarization and crew co-ordination. Compliance will be verified by the Auditor during company and shipboard audits (refer to respective remarks in F575E / F 578E).

## 6 Treatment of FPSOs, FSUs with respect to ISM Certification

The operations of FPSOs, FSUs etc. should be evaluated against the following four situations when deciding whether the ISM Code applies:

- The vessel disconnects from the mooring system at regular intervals to proceed under its own power to a discharge port. In this case, SOLAS and the ISM Code apply, and the unit will need a Safety Management Certificate as from 1<sup>st</sup> July 1998.
- The vessel has the ability to disconnect from the mooring system, and will do so for meteorological or security reasons. SOLAS may apply in these circumstances, unless the operator is holding an exemption from the administration.
- The vessel disconnects from the mooring system and proceeds under its own power to a dry-dock or repair berth, for survey or repair, at very infrequent intervals, perhaps every five or ten years. In this case, it is likely that the administration and the operator will have reached agreement on the particular arrangements to be made when this occurs. This arrangement should clarify if SOLAS and the ISM-Code will apply.
- The vessel can be disconnected from the mooring system, but has no independent means of propulsion. Disconnection occurs only when repairs are needed that require that the unit be towed to a repair yard. SOLAS and ISM-Code will not apply.

In some parts of the world, a safety case regime may be in operation that requires the operating company to have developed a risk-based safety management system covering the operation of the oil field as a whole, including the vessel. Since it would be unreasonable to expect the company to implement and maintain two separate systems with similar objectives, the company may have addressed the requirements of the ISM-Code by combining an existing risk-based safety management system in conjunction with a 'bridging' document which addresses any ISM Code requirements not covered by the safety case regime.

Any regulatory requirements imposed by the relevant coastal state authorities must also be taken into account by the operator.

Despite this general guidance and particularly in cases when one of the four situations does not apply, the final responsibility for deciding whether the ISM Code applies lies with the Flag Administration. In case of any doubt, the vessel's operator should contact the Administration in order to obtain a decision.

## 7 Abandonment of ISM audits

It is at the auditor's discretion to stop an audit if there are clear grounds to believe, that the audit cannot be completed under the prevailing circumstances. Possible scenarios could be but shall not be limited to:

- No SMM is available
- Company/master request to cancel or stop the audit (try to get written confirmation)

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- No representative number of auditees are available
- Vessel is not afloat or not under operational conditions
- Nobody is prepared or informed about the audit and second item above applies
- No immediate Corrective Action is possible upon detection of a Major Non-Conformity

In such cases, the reason for the abandonment shall be clearly stated in the Audit Report.

If observation(s), Non-Conformity(ies) or Major Non-Conformity(ies) which can be downgraded to a Non-Conformity upon immediate Corrective Action are discovered, the audit should be completed and all Non-Conformities identified are to be reported. This will enable the company to make necessary corrective action and the next attending auditor to clearly identify the result of previous audit. Full documentation shall be submitted according to standard procedure.

If possible, the auditor shall contact GL H.O. and /or respective flag state administration for advise before stopping an audit.

## 8 Transfer of ISM code certification

In case where a ship's ISM Code certification is transferred from another IACS society, the Auditor will review the reports from the audits performed by the previous society at the beginning of the audit. He is entitled to acquire the information he needs from the other societies or, if relevant from the administration, in order to check the veracity of the information presented to him by the company. Communication with flag states or other IACS societies shall be established.

## 9 Endorsement of DOC and SMC outside the permissible time window

Generally all audits shall be arranged and assigned via GL Head Office Department BSM, to make sure that the respective auditor will be provided with additional information related to the audit as far as applicable for the actual situation. For further information see also in Section-I, item 5 (Responsibilities) and in Section-II, item 3.2 (Performance). The following procedure applies and shall be observed by auditors in cases that the company requests an audit for DOC / SMC out of the time window or when the certificate has already been expired.

### 9.1 Shipboard Audits

When a company requests a shipboard audit too late for the audit to take place within the range dates of the SMC, Germanischer Lloyd or the company shall inform the Administration and ask for an authorization to proceed with the audit. Unless otherwise instructed by the Administration, the following action shall be taken.

On his arrival on board, the auditor will raise a major non-conformity indicating that not all the required statutory certificates are in place.

The major non-conformity will be downgraded if the audit is otherwise successful, and the certificate will be endorsed with the statement "Endorsed outside range dates according to authorization given by the Flag State." The authorization as given by the Administration shall be available on board together with the certificate. The auditor shall make a statement on this within the audit report.

The resulting down-graded major non-conformity will be closed at the upcoming additional audit, which is a consequence of the major non-conformity.

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## 9.2 Office Audits

When a company requests an office audit too late for the audit to take place within the range dates of the DOC, Germanischer Lloyd or the company shall inform the Administration and ask for an authorization to proceed with the audit. Unless otherwise instructed by the Administration, the following action shall be taken.

On his arrival at the company's office, the auditor will raise a major non-conformity indicating that not all the required statutory certificates are in place.

The major non-conformity will be downgraded if the audit is otherwise successful, and the certificate will be endorsed with the statement "Endorsed outside range dates according to authorization given by the Flag State." The authorization as given by the Administration shall be available at the company's premises together with the certificate. The auditor shall make a statement on this within the audit report.

The resulting down-graded major non-conformity will be closed at the upcoming additional audit, which is a consequence of the major non-conformity, provided that there have been no similar incidents in the meantime with SMCs of the company's fleet.