TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF MERCHANT SHIPS, AND RECOGNIZED ORGANIZATIONS

SUBJECT: Passenger Ships - Underwater Examination/Survey in Lieu of Drydocking

References: (a) SOLAS, International Convention for the Safety of Life at Sea, Consolidated Edition 2014, as amended
(b) IMO Resolution A.1140(31), Revised Survey Guidelines Under the Harmonized System of Survey and Certification (HSSC), adopted 04 December 2019
(c) IMO Circular MSC.1/Circ.1348, Guidelines for the Assessment of Technical Provisions for the Performance of an In-Water Survey in Lieu of Bottom Inspection in Dry-Dock, issued 02 June 2010

PURPOSE:

This Notice outlines the procedures and circumstances by which the underwater examination/survey of a passenger ship's hull by divers in lieu of drydocking may be permitted. This Notice supersedes Rev. 02/16.

APPLICABILITY:

This Notice applies to all passenger ships as defined by SOLAS.

BACKGROUND:

Regulation 7(b)(ii) in Chapter I of SOLAS requires the annual inspection of passenger ship structures, including the outside of the ship's bottom, as part of the annual renewal survey for issuance of a Passenger Ship Safety Certificate (PSSC). The external bottom examination is normally performed with the ship in dry dock. However, it is also recognized that under certain conditions for specific surveys, the external examination of the ship’s bottom may be carried out with the ship afloat.

The Harmonized System of Survey and Certification (HSSC) Guidelines Resolution A.1140(31) specifies that a passenger ship’s bottom inspection as required by SOLAS regulation I/7 should be carried out annually, with two inspections in dry-dock in any five-year period. However, this minimum number of inspections in dry-dock on the outside of the bottom of a passenger ship may be reduced from two to one by allowing an in-water survey in lieu of bottom inspection in...
dry-dock. International Maritime Organization (IMO) Circular MSC.1/Circ.1348 has guidelines for performing an in-water survey in lieu of a dry-dock examination.

**REQUIREMENTS:**

1.0 **Definitions**

1.1 **Any five year period**

In accordance with paragraph 5.10.2 of IMO Resolution A.1140(31), “any five year period” is defined as the five-year period of validity of the International Load Line Certificate. As such, harmonization between the Passenger Ship Safety Certificate and Load Line Certificate is essential. For ships that do not have harmonized certificates, such harmonization must occur within the next five-year cycle of drydocking. The Load Line Certificate must coincide with the five-year class certificate.

1.2 **Docking Survey (DS)**

The inspection of the outside of the ship’s bottom while in dry-dock, including measurements of shaft and rudder bearing clearances, as appropriate.

1.3 **First dry-docking**

Where a new regulation is required to be applied at the “first scheduled dry-docking”, the Republic of the Marshall Islands (RMI) Maritime Administrator (“the Administrator”) requires it to be applied as if a passenger ship is dry-docked twice in any five year period, regardless of the age of the passenger ship. This policy is not applicable if a date is otherwise stipulated in the regulation, or other IMO instrument.

1.4 **Underwater Examination (UWE)**

The inspection of the outside of the ship’s bottom while afloat as part of the Passenger Ship Safety Renewal survey.

1.5 **Underwater Survey (UWS)**

The inspection of the outside of the ship’s bottom while afloat in lieu of a dry-docking, including measurements of shaft and rudder bearing clearances, as applicable.

2.0 **General Procedures**

2.1 The operator of the ship must make the request to perform an underwater examination in lieu of drydocking directly to the Recognized Organization (RO) issuing the Passenger Ship Safety certificate on behalf of the Administrator. The request must contain, as a minimum:

- the proposed schedule and location when the ship will be available for inspection;
• a statement in writing from the Master confirming that the ship has not sustained any grounding or contact damage since the previous bottom inspection; and

• proof of implementation of a comprehensive maintenance regime based upon a five-year cycle in accordance with MSC.1/Circ.1348, Guidelines for the Assessment of Technical Provisions for the Performance of an In-Water Survey in Lieu of Bottom Inspection in Dry Dock.

2.2 Submission of the application to the RO must be provided at least four weeks in advance of the intended date of inspection.

2.3 As part of the application process, the Administrator requires confirmation from the RO that there are no outstanding Conditions of Class, Recommendations, or Memoranda in relation to the ship’s structure or hull.

2.4 The RO must evaluate the request against the relevant conditions specified in §6.0 below and, after considering all pertinent information (Class Survey records, etc), make a recommendation to the Administrator.

2.5 If the request is approved, the underwater examination must be performed according to the RO procedures to the satisfaction of the attending surveyor.

3.0 All Passenger Ships

3.1 The Administrator recognizes the examination of passenger ships in dry-dock at least twice during any five (5) year period, to coincide with the survey guidelines provided in IMO Resolution A.1140(31). Underwater examinations are to be requested for the three remaining passenger ship safety renewal surveys in accordance with the procedures outlined above. See Table 1, below, for an example of this inspection regime.

3.2 The interval between the dry-dock surveys must not exceed three years. Therefore, the first bottom survey in dry-dock during any five year period must be scheduled during the second or third year of the five year cycle.

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<td>UWE</td>
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<td>UWE</td>
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3.2.1 Passenger Ships Less than 15 Years of Age

4.0 For passenger ships of 15 years of age or less, other than Ro-Ro passenger ships, the Administrator may consider applications to permit one UWS during any five year period. In such cases, the DS must be scheduled so that the interval between dry-dockings does not exceed five years.
4.2 UWEs are to be requested for the three remaining annual inspections in accordance with the procedures outlined above. See Table 2 for an example of this inspection regime.

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5.0 Passenger Ships Greater than 15 Years of Age

Passenger ships of 15 years of age and over must carry out the external bottom survey in dry-dock as required by §3.0, above. Although the relaxation provided for in §4.0, above is generally not permitted for passenger ships of 15 years of age and over, such ships may be evaluated on a case-by-case basis for special consideration.

6.0 Conditions for Underwater Examination/Survey

6.1 The ship must be constructed to facilitate the UWE and UWS, and be assigned the requisite Class Notation for the same.

6.2 The IMO Guidelines of MSC.1/Circ.1348 are to be applied on a mandatory basis for all passenger ships regardless of age.

6.2.1 The Administrator will consider, on a case-by-case basis, alternative arrangements where the provisions of MSC.1/Circ. 1348 cannot be met.

6.3 All UWEs, UWSs and DSs, must be carried out within the normal renewal survey window of three months before the survey due date, up to the due date.

6.3.1 If a survey in dry-dock is not completed within this window, the Passenger Ship Safety Certificate will cease to be valid until the survey in dry-dock is completed.

7.0 Monitoring and RO Reporting

7.1 The RO must advise the Administrator of the outcome of all in UWEs or UWSs where there is any need for further examination of the ship and/or remedial action which may need to be taken with the ship in dry dock.