

Republic of the Marshall Islands

MARITIME ADMINISTRATOR

11495 COMMERCE PARK DRIVE, RESTON, VIRGINIA 20191-1506
TELEPHONE: +1-703-620-4880 FAX: +1-703-476-8522
EMAIL: maritime@register-iri.com WEBSITE: www.register-iri.com

MARINE SAFETY ADVISORY No. 05-21

To: Owners/Operators, Masters, Nautical Inspectors, Recognized Organizations

**Subject: TEMPORARY ALTERNATIVE INSPECTION PROTOCOLS DURING
COVID-19 PANDEMIC RESPONSE AND RECOVERY**

Date: 27 April 2021

This Marine Safety Advisory (MSA) extends the Temporary Alternative Inspection Protocol (TAIP) that was established in April 2020 to meet inspection requirements during the Coronavirus Disease (COVID-19) pandemic. It supersedes MSA No. 17-20.

1.0 BACKGROUND

- 1.1 The TAIP was established to meet inspection requirements identified in Republic of the Marshall Islands (RMI) Maritime Regulations ([MI-108](#)), §5.34 and RMI Marine Notice [5-034-1](#) where a physical inspection of the vessel by an RMI Nautical Inspector is not possible due to COVID-19 safety concerns.
- 1.2 The TAIP is separate from RMI Marine Notice [5-034-2](#), which applies to vessels not covered by international conventions and those operating in remote, offshore, or areas experiencing civil unrest where a Nautical Inspector may not be readily available.
- 1.3 For additional COVID-related information, including inspections, refer to the RMI Maritime Administrator's (the "Administrator's") COVID-19 [webpage](#).

2.0 APPLICABILITY

- 2.1 All RMI-flagged vessels requiring inspection under MI-108, §5.34 are considered qualified for the purposes of this TAIP.

3.0 PROCEDURES FOR VESSEL OWNERS OR OPERATORS

- 3.1 On receiving the automated "inspection due" email notification, the owner or operator must provide the vessel's itinerary and any additional requested information to the appropriate regional office.

This MSA is evaluated annually by the Administrator and expires one year after its issuance or renewal unless otherwise noted, superseded, or revoked.

- 3.2 If an in person inspection by a Nautical Inspector is not feasible due to COVID-19 safety concerns, the regional Fleet Operations Manager may use a TAIP after reviewing the performance history of the vessel and company. This includes possibly postponing or rescheduling the inspection for a later date or conducting the inspection remotely with crew interaction.
- 3.3 A successfully completed remote inspection will be satisfactory for fulfilling the RMI Safety Inspection requirements for a maximum of six months.

4.0 OPTIONS UNDER THE TAIP

4.1 Annual Safety Inspections

- .1 In the case of COVID-19 safety concerns, RMI-flagged vessels due for an inspection can be given additional months to complete the required annual flag State inspection, if
- (a) they have good flag and port State control performance history; and
 - (b) are on a 12-month inspection interval.
- .2 The inspection postponement can be for three months maximum.
- .3 This will be documented in the Administrator's inspection scheduling database and rescheduled as needed.
- .4 Other RMI-flagged vessels not in the category above may be required to complete a remote inspection.
- .5 Vessels identified for a remote flag State inspection will be notified and provided with a list of questions relevant to the ship's documentation, equipment maintenance, and crew's emergency preparedness.
- (a) The questions must be completed by the Master or Chief Engineer and submitted to the scheduling office before arrival in port.
 - (b) A regional critical items checklist may be used to meet this requirement, such as:
 - (i) [MSD 340](#), *Critical Items Checklist* for vessels calling ports in the United States;
 - (ii) [MSD 340AC](#), *Critical Items Checklist (Australia-China)* for vessels calling in Australia or China; or
 - (iii) sections of the [MSD 252](#), *Report of Operational Safety Inspection*.

- (c) The Master also may be required to submit evidence to demonstrate compliance. This includes:
 - (i) photographs;
 - (ii) copies of logbook entries;
 - (iii) maintenance records; or
 - (iv) other information as requested.
- .6 Instead of physically boarding the vessel while in port, the Administrator will contact the Designated Person Ashore, Master, or Chief Engineer (if possible) on the telephone, or other agreed communication means, and review the results of the self-inspection checklists and the submitted information.
- .7 RMI-flagged Mobile Offshore Units (MOUs) not meeting §4.1.1 (above) may be required to complete a remote inspection.
 - (a) MOUs identified for a remote flag State inspection will be notified and requested to complete:
 - (i) [MSD 252MOU](#), *Safety Inspection Report*;
 - (ii) [MSD 252MOUSUPP](#), *Operational Safety Inspection Supplement*; and
 - (iii) provide compliance verification for the critical items noted in the [MSD 252MOUIG](#), *Inspectors Guide* (those with an asterisk).
 - (b) The Master, Offshore Installation Manager, or appointed designee may be asked by the Administrator to provide answers to additional questions about the unit's documentation, equipment maintenance, and crew's emergency preparedness. Further supporting photographs, copies of logbook entries, maintenance records, or other information may be requested.

4.2 Special Inspections

- .1 Vessels on a reduced interval and which are due for a special inspection may be eligible to undergo a remote flag State inspection as described in §4.1.2 above. The scope of the remote flag State special inspection will be outlined by the Administrator.

4.3 Quality Control Boardings

- .1 In the best interest of owners and operators, the Administrator will continue to conduct quality control boardings (QCB). These may also be done remotely following many of the same principles outlined above.
- .2 An important aspect of this program is interaction between the Administrator's Fleet Operations department, the vessel owner and operator, the vessel's crew, and the proper notification of deficiencies to local coastal State or port State control authorities when required. Transparency of operations and information will be essential to the success of this TAIP during the COVID-19 pandemic.

4.4 Documentary Evidence of Compliance:

- .1 Documentary evidence of compliance that may be required by the Administrator for remote inspections includes, but is not limited to copies of:
 - (a) Oil Record Book log entries (last 30 days);
 - (b) Lifesaving and firefighting preventative maintenance logbook (most recent entries);
 - (c) Crew payment and crew rest hour records (most recent);
 - (d) External and internal audit findings for any non-conformities (most recent);
 - (e) Last confined space entry date (official logbook entry);
 - (f) Last fire and abandon ship drill date (official logbook entry);
 - (g) Last operational test of the rescue boat and lifeboat (include the date of the latest waterborne drill); and
 - (i) the lifeboat and rescue boat must start on the first attempt;
 - (ii) be able to engage ahead and astern; and
 - (iii) the rudder must be able to shift from full port to full starboard (this must be an official logbook entry).
 - (h) Most recent Master's SMS review.
- .2 Digital images or video of the following:
 - (a) Rescue boat and lifeboat (hull, windows, and wire rope);

- (b) Discharge of water from two fire hoses and the emergency fire pump gauge pressure;
 - (e) Emergency generator and auxiliary engines running;
 - (f) Steering gear; and
 - (g) Fixed firefighting equipment, such as the CO₂ room, foam or water mist systems.
- .3 Instead of physically boarding the vessel while in port, the Administrator will contact the Designated Person Ashore, Master, or Chief Engineer (if possible) on the telephone, or other agreed communication means, and review the results of the self-inspection checklists and the submitted information.

5.0 TEMPORARY PROTOCOL

- 5.1 All parties are reminded that TAIP is a temporary alternative program which may be employed as an alternative means to verify compliance with the Administrator's requirement for a safety inspection of the vessel. It does not alter any of the Administrator's other requirements. The final decision to utilize the TAIP will be assessed and approved by the Administrator on a case-by-case basis.
- 5.2 Communication between the vessel, owner or operator, Administrator, Recognized Organizations, and port or coastal States is critical as all must work together to ensure continued crew and vessel safety, security, and protection of the marine environment while facilitating essential maritime trade during this pandemic.
- 5.3 Specific questions about this temporary protocol may be directed to: inspections@register-iri.com.
- 5.4 Specific questions about yachts should be sent to: yacht-inspections@register-iri.com.
- 5.5 Specific questions about MOUs should be sent to: inspections-offshore@register-iri.com.