



Office of
Deputy Commissioner
of Maritime Affairs

THE REPUBLIC OF LIBERIA

Bureau Of Maritime Affairs

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MARINE OPERATIONS NOTE: 05/2006

RE: GUIDELINES FOR FOLLOW UP PROCEDURE ON NON CONFORMITIES RAISED BY LIBERIAN AUDITORS

Dear Owner/Operator:

We would like to clarify and provide guidelines the Administration expects of the vessel Owner / Operator regarding the follow up of Non Conformities (NCs) raised by Liberian Auditors on Liberian vessels. The guidelines on the NCs encompass Major, Minor NCs and Observations.

The Liberian Auditors have been instructed and trained to observe and record deficiencies in the hope that this Administration should be the first one to observe the shortcomings in procedures and defects. The aim is to maintain the highest safety standards of the Liberian registry and to support the Owners/ Operators in operating safe ships. We trust that we will have your full cooperation in achieving this objective.

The procedure to be followed when a NC is raised is given in the subsequent paragraphs.

ISM Related

Corrective Action Report (CAR):

- All NCs raised by the Liberian Auditor must be promptly reported by the Master to the DPA with a view to address them expeditiously.
- All efforts must be made to remedy the MNC / NC in the agreed time frame as indicated on the NC form. If no time frame has been agreed then it should be addressed promptly.
- Under all circumstances the proposed CAR should be submitted to the Administration's head office at Vienna, VA within 30 days from the date of the NC.
- Any reasonable requests for extension in time to remedy the MNC/ NC should be discussed with the Auditor and this Administration informed.

- Authorization's for extension may only be granted by the Administration and decided on a case by case basis.
- The CAR should not only address the NC but provide a procedure to be implemented to prevent recurrences of the NC in the future. A root cause analysis must be carried out. Specific details in handling MNC /NC are explained below.

Major Non-Conformity (MNC): A MNC issued by the Liberian Auditor, should be taken as a matter of serious concern by the Master of the vessel. The Administration expects that the Master will immediately inform the Company/ DPA and take immediate measures to correct the MNC. All efforts must be made to remedy it so that the MNC is closed prior to departure from the port. Any reasonable requests for extension in time to remedy the MNC should be discussed with the Auditor and this Administration informed. Downgrading of the MNC may be granted on a case by case basis and decided only by this Administration. The DPA is expected to provide a Corrective Action Report (CAR) to this Administration immediately so that the MNC can be closed out.

Non-Conformity (NC): The CAR for a NC should be submitted to the Administration in the agreed time frame. However under no circumstances should the CAR or Proposed CAR be delayed beyond 30 days from the date the NC was raised.

Observations: The Obs. made by the auditor should be handled the same as a NC. Although this Administration does not require a CAR for Obs. (except in case of ISPS related Obs. – explained below), it is in the interest of the vessel that the input be used to put preventive measures in place to avoid the Obs. become a NC.

CAR Acceptance Procedure: All CARs submitted to this Administration will be reviewed, particularly with a view to analyze the root cause and to see if the DPA has addressed the NC to avoid future reoccurrence. Once the CAR is accepted by the Administration an e-mail to this effect will be made. This e-mail from the Administration should be forwarded to the Master to keep with the original NC as proof of the acceptance by the Administration.

Close out of the NC: All MNC / NC have to be closed out by a Liberian Auditor. This can be done during a routine visit by the Liberian Auditor for any other audit at any convenient port. The Liberian Auditor will close the NC based on the CAR acceptance e-mail of the Administration and the physical evidence of corrective measures implemented on board. The DPA is to advise the Administration when a NC is closed out.

ISPS Related

The same guidelines as for ISM related MNC / NC / Obs. apply to ISPS MNC / NC / Obs. except the following:

ISPS related NC: All security related NC's under the ISPS Code invariably lead to detention of the vessel. With this in mind, the Administration has advised Liberian Auditors to prefer making Obs. rather than NC's. This has been done in the best interests of the Owner/ Operator, However unlike ISM Obs. Observations for security require CAR and CSOs should be cognizant of the policy to ensure appropriate timely action is taken. All ISPS related Obs. must be thoroughly investigated; root cause analysis carried out and dealt with the utmost of urgency. The CAR for ISPS related Obs. must be submitted to the Administration at the earliest opportunity. CSO's should inform Masters of the implications when a NC related to ISPS is raised and immediately contact the CSO. This Administration must be informed immediately by the CSO of such instances.

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