

**ISM COMPLIANCE MATRIX**

**PROCEDURES COMPLIANCE WITH ISM**

No	PROCEDURE	ISM
CP01	DOCUMENT CONTROL	11
CP02	CONTRACT REVIEW	-
CP03	MANAGEMENT OF CHANGE	-
CP04	COMMUNICATIONS	6.7
CP05	RECRUITMENT AND PLACEMENT	6.1/6.2/6.7
CP06	SEAFARERS TRAINING, APPRAISAL & FAMILIARISATION	6.3/6.4/6.5/6.6/6.7
CP07	SHORE BASED PERSONNEL RECRUITMENT, TRAINING & APPRAISAL	6.3/6.4/6.5
CP08	RISK ASSESSMENT	1.2.2 (.2)
CP09	MOORING OPERATIONS	7
CP10	MAINTENANCE, INSPECTION & CONDITION MONITORING OF VESSEL	7/10
CP11	DRY-DOCKING & REPAIRS	10.1
CP12	EQUIPMENT CALIBRATION & TESTING	10.3
CP13	NAVIGATION	7
CP14	CARGO OPERATIONS	7
CP15	VESSEL PERFORMANCE REPORTING & MONITORING	7
CP16	PURCHASING & SUPPLIER ASSESSMENT	-
CP17	HEALTH, SAFETY MANAGEMENT & ENVIRONMENTAL PROTECTION	7/8
CP18	ACCIDENTS, SERIOUS ILLNESS & HAZARDOUS OCCURRENCE REPORTING & ANALYSIS	9
CP19	DRUGS AND ALCOHOL	6.2
CP20	FILING SYSTEM	6.6/11
CP21	NON-CONFORMANCE	9.1
CP22	CORRECTIVE & PREVENTIVE ACTION	9.2/12.3/12.6
CP23	MANAGEMENT ANALYSIS & REVIEW	12.2/12.5
CP24	INTERNAL AUDITS	12.1/12.3/12.4/12.5

**POLICY COMPLIANCE WITH ISM**

<b>POLICY</b>	<b>ISM</b>
MISSION STATEMENT	-
SCOPE & DESCRIPTION OF THE COMPANY MANAGEMENT SYSTEM	1
ORGANISATION STRUCTURE, RESPONSIBILITIES & ACCOUNTABILITIES	3.2/3.3/4/5
QUALITY POLICY	-
HEALTH, SAFETY & ENVIRONMENTAL PROTECTION POLICY	1.2.2 (.2)/ 1.4.1/ 2.1
SECURITY POLICY	-
EMERGENCY RESPONSE POLICY	8
NAVIGATION POLICY	7
CARGO OPERATIONS POLICY	7
VESSEL PERFORMANCE MONITORING POLICY	7
VESSEL MAINTENANCE INSPECTION POLICY	7/10
EQUIPMENT CALIBRATION POLICY	10.3
RECRUITMENT, TRAINING & APPRAISAL OF SEAFARERS POLICY	6.1/6.2/6.3/6.4/ 6.5/6.6/6.7
SHORE BASED PERSONNEL MANAGEMENT POLICY	6.3/6.4/6.5
DRUGS & ALCOHOL POLICY	6.2
PURCHASING POLICY	-
COMMUNICATIONS POLICY	6.7
CONTRACT REVIEW POLICY	-
DOCUMENT CONTROL POLICY	11
PLANNING OF PRODUCT REALIZATION POLICY	7
NON-CONFORMANCES, ACCIDENTS, HAZARDOUS OCCURRENCES & OCCUPATIONAL INJURIES AND DISEASES REPORTING, ANALYSIS AND CONTINUAL IMPROVEMENT POLICY	9/12.6
INTERNAL AUDIT POLICY	12.1/ 12.3/12.4/ 12.5
MANAGEMENT REVIEW POLICY	12.2
CUSTOMER FOCUS POLICY	-
BUSINESS ETHICS POLICY	-
COMPANY OBJECTIVES POLICY	-
SEQUENCE & MAPPING OF COMPANY PROCESSES POLICY	-
QUALITY RECORDS & FILING SYSTEM POLICY	11

**ESTORIL MANAGEMENT SYSTEM COMPLIANCE WITH LIBERIAN FLAG ADMINISTRATION REQUIREMENTS**

LIBERIAN REQUIREMENT	DESCRIPTION	CMS REFERENCE
ISM-001, Para. 5.2	Safety & Environmental Protection Policy must be signed by the Company's Chief Executive or other senior executive officer.	Policy Manual, Sec. 05
ISM-001, Para. 5.2	Safety & Environmental Protection Policy should be reviewed at regular intervals.	CP17, par. 3.2./ CP23, Par.3.5
ISM-001, Para. 5.3	The Company who has assumed the responsibility for operation of a ship from the Ship owner should agree <u>in writing</u> to take over all the duties and responsibilities imposed by the Code.	As per relevant notification
	The owner, even if the entity responsible for the operation of a ship is other than the owner, must provide the Office of the Deputy Commissioner, Marine Safety Division, with the name, address telephone and fax numbers, and E-Mail address of the Company responsible for the operation of the vessel.	As per completed RLM-297 "Declaration of Company".
ISM-001, Para. 5.5	The Company must designate a person or persons who will be responsible for monitoring and verifying proper operation of the CMS within the company and on each ship.	Policy Manual, Sec. 03, CP17, Para. 3.2 and ERP, Appendix A
	The Company must provide Office of the Deputy Commissioner, Marine Safety Division, with the full name of the DPA and current information sufficient to enable direct and immediate contact at all times between the Administration and the DPA.	As per completed RLM-297 "Declaration of DPA".
ISM-001, Para. 5.6.1	The CMS should incorporate the elements of IMO Resolution A.443 (XI) "Decisions of the Ship Master with regard to Maritime Safety and Marine Environment Protection"	FIM, Chapter A, Para. 2.1
ISM-001, Para. 5.6.2	Any system of operational control implemented by Company shore based management must allow for the Master's absolute authority and discretion to take whatever action considers to be in the best interest of passengers, crew, cargo, the vessel and the marine environment.	FIM, Chapter A, Para. 2.1 & ERP, Sec. 4.3
ISM-001, Para. 5.6.3	The Company should provide the Master with documentation of the specific duties delegated to the officers under Master's command.	FIM, Chapter A, Para. 2&3
ISM-001, Para. 5.7.2	The Company's Management System should ensure that joining crew members have proper seafarer's certification including licenses, special qualification certificates, seafarers identification and record books and training as required by international conventions, the Liberian Maritime Law, the Liberian Maritime Regulations and specifics of the publication "Requirements for Merchant Marine Personnel Certification", RLM-118.	CP05, Par. 3.2.2
ISM-001, Para. 5.7.3	The shipboard CMS should include procedures for the transfer of command and documented hand-over notes.	CP06, Para. 3.2.3, Forms: VC-03
	The shipboard CMS should include procedures for documented duties instructions, familiarization training in accordance with section A-I/6 of the STCW Code, 1978, as amended, for on-coming officers and crew, and on board documentation retention.	CP06, Para. 3.2 & 3.3, CP20 (document retention) & Forms VC-01, VC-02, OC-03, OC-07.
ISM-001, Para. 5.8.1.1	A "Master's Port Arrival / Departure Safety Check List" should be included in the shipboard CMS incorporating pre-established Company policy guidelines for "GO, NO GO" situations and reporting requirements for the Master's compliance.	CP13, Para. 3.3, Forms: VN-07, "Preparation for sea" and VN-13, "Preparation for arrival in port"
ISM-001, Para. 5.8.1.3	The Ship's operations plans should include procedures to insure the required Liberian annual safety inspection is conducted on time and in accordance with the Maritime Regulations and Marine Notice INS-004.	CP10, Para. 3.2 & 3.3
ISM-001, Para. 5.8.1.4	The ship's operations plans should incorporate the Maritime Regulations requirement for emergency drills and weekly training sessions.	CP17, Para. 3.3, FIM, Chapter B, Para. 5 and as per VS-10
ISM-001, Para. 5.9	The Company's Management System must provide that statutory, Administration, or Company required emergency preparedness plans will be periodically reviewed and updated, and if necessary, re-approved by the Administration or an RO on its behalf.	CP17, Sec. 3.3.2 CP23, Sec. 3.5

LIBERIAN REQUIREMENT	DESCRIPTION	CMS REFERENCE
ISM-001, Par. 5.10.1	The shipboard CMS procedures for reporting accidents and incidents should incorporate the provisions of Chapter IX of the Maritime Regulations (RLM-108) which require the immediate notice and reporting of incidents to the Administration and establishes duties and responsibilities for the Company, ship officers and crew.	CP18 and as per Forms: RLM-109, "Report of Vessels casualty or accident" and RLM-109-1, "Report of personal injury or loss o life"
ISM-001, Par. 5.10.2	The CMS should also incorporate the provisions of Article IV and Article X of the "Rules for Marine Investigations and Hearings" (RLM-260).	As above
ISM-001, Par. 5.10.3	The CMS should also incorporate the provisions of Maritime Regulation 10.296(7) on accident prevention and appointment of safety officer.	FIM, Chapter A, Para. 2.5
ISM-001, Par. 5.10.4	The Company and shipboard CMS should contain procedures for immediately reporting Port State detentions to the Administration.	CP10 Para. 3.5
ISM-001, Par. 5.11.1	The maintenance system established by the Company and documented in its CMS should include systematic plans and actions designed to address all those items and systems covered by class and statutory surveys and ensure that the vessel's condition is satisfactorily maintained at all times.	CP10
ISM-001, Par. 5.11.2	As part of Company initiated ship safety inspections, the shipboard CMS should include reference to the Liberian annual safety inspections required by Maritime Regulation 7.191, as more fully described in Marine Notice INS-001, and use of Form No.338-1/00, the "Operational/ Safety Checklist for SOLAS 74/78", or a similar Company developed form as addressed in Marine Notice INS-004.	CP10 Paragraph 3.2 CP10 Paragraph 3.3.2 & Fire Fighting Equipment and Life Saving Appliances Maintenance Plans
ISM-001, Par. 5.11.3	The CMS should also provide for the logging of actions or measures taken to rectify deficiencies and non-conformities noted during surveys and annual safety inspections and the giving of notification to the Administration and designated RO of the corrective actions taken.	CP10, Sec3.2, Form: OS-07
ISM-001, Par. 5.12	Documents should be easily identified, traceable, user friendly and not so voluminous as to hinder the effectiveness of the CMS.	CP01
ISM-001, Par. 5.13	The Company must conduct internal audits shore and on each ship at least annually to determine whether the various elements of the CMS have been fully implemented and are effective in achieving the stated objectives of the Code. The internal audits are in addition to the annual, intermediate, and renewal audits carried out by the Liberian Auditor or an Recognized Organization	CP24

**ESTORIL MANAGEMENT SYSTEM COMPLIANCE WITH BAHAMIAN FLAG ADMINISTRATION REQUIREMENTS**

BAHAMIAN REQUIREMENT	DESCRIPTION	CMS REFERENCE
BMA B66-12/04	The vessel will be inspected by a Bahamas Maritime Authority (BMA) approved Nautical Inspector annually within three (3) months before or after the assigned anniversary date. A valid Bahamas Certificate of Inspection (COI) must be displayed at a prominent location either on the Navigation Bridge or within the accommodation.	CP10, Para. 3.2
BMA B21-12/01	The Company shall ensure that all Bahamian ships carry copies of the latest merchant shipping legislation and the Officer's Guide.	List of Publications
BMA Information Bulletin No. 72 rev.01	Enhancing Lifeboat Safety during Abandon Ship Drills: (a) The Master shall use his professional judgement to modify or postpone the drills that are required under SOLAS Ch. III Reg. 19.3. Full details of planned drills are to be entered onto the Official Log Book with reasons for the modification or postponement. (b) At ISM Audits, the following must be available on board: <ul style="list-style-type: none"> <li>• Manufacturer's instructions and recommendations</li> <li>• The Company's procedures for maintenance and inspection</li> <li>• Records of lifeboat drills</li> <li>• Records of inspection and maintenance of equipment, including details of the competent persons undertaking the activity</li> <li>• Failure to maintain any of these documents is considered to be ISM Non-Conformity and must be specially reported to the Bahamas Maritime Authority.</li> </ul>	FIM, Chapter B, Para. 5.2.1.1 Maintenance Plan for LSA
BMA Information Bulletin No. 89	The Company is responsible for assessing and selecting a suitable "competent person" emphasising on the training, development and motivation of the seagoing staff. Documentary evidence of personnel competence, e.g. records of training, study and assessment, must be available on board.	FIM, Chapter A, Para. 1.4, 2.1
BMA Information Bulletin No. 101, rev.01	Master shall include a Flag State file in his filing system. This file is to incorporate revised BMA Information Bulletins and notices, together with a revised copy of the Bahamas National Requirements. The carriage of this document is to be verified during SMC audit. (BNR SOLAS Ch. IX Flag State File). Copies of these documents - in either hard copy or digital form - are to be maintained for immediate reference onboard every vessel and in every shore office.	CP20
BMA Information Bulletin No. 120	The Company shall immediately notify the BMA, the Classification Society and/or Recognised Organisation issuing the affected certificate and the ISM issuing body, of any detention of a Bahamian registered vessel. In addition, the Company is required to invite the Classification Society and relevant Recognised Organisation on board to assist in clearing up the deficiencies. The initial report to the BMA must include: <ul style="list-style-type: none"> <li>• A full copy of the PSC report.</li> <li>• Confirmation of notification to Classification Society and</li> <li>• Recognised Organisations as appropriate.</li> <li>• Advice of actions taken or planned to rectify all deficiencies at the earliest opportunity.</li> </ul> <p>Good communications are essential to enable prompt resolution of matters related to PSC detention. It is important that the BMA receive the initial report promptly so that an assessment of the detention can be made. The Company is required to perform a formal analysis of the root causes and take the appropriate corrective actions to prevent similar deficiencies arising in future. The report of this analysis and corrective actions (final report) is to cover all of the deficiencies raised at the detention and should also include comments from the Master or Chief Engineer on the deficiencies.</p> <p>The final report must be submitted to the BMA at the earliest opportunity, but not later than three weeks from the date of detention.</p>	CP10 Para. 3.5

BAHAMIAN REQUIREMENT	DESCRIPTION	CMS REFERENCE
BMA Information Bulletin No. 04	<p>If the vessel is involved in an accident involving serious injury; loss of life; or damage to the ship, property or the environment the Company must report the accident to the Bahamas Maritime Authority. An Initial Report should be communicated to the BMA Casualty Investigation section within 4 hours of the Accident by telephone, fax or email.</p> <p>The Initial Report should give brief details of the casualty:</p> <ul style="list-style-type: none"> <li>• Ship's Name,</li> <li>• IMO Number</li> <li>• Time of Accident</li> <li>• Position</li> <li>• Brief Description of the Accident</li> </ul> <p>In the case of serious marine casualty resulting in major damage, pollution, serious injury or loss of life outside office hours the Emergency Response Officer should be contacted.</p>	CP18 & "Casualty Report Form" (CRF-1)