



Title: Change of Flag, Recognized Organizations (RO), Recognized Security Organizations (RSO), and ISM Operators

To: Deputy Registrars, Ship Owners, ISM Operators, Recognized Organizations, Recognized Security Organizations, Shipping Agents, General Safety Inspectors

MMN Superseded: MSN-0003, 0004, 0011 & 0031
(9 Jan 2002; 4 Jan 2002; 3 Mar 2004; 18 Mar 2008)

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1. REFERENCE

- RESOLUTION MEPC.237(65) AND MSC.349(92) CODE FOR RECOGNIZED ORGANIZATIONS (RO CODE).
- RESOLUTION A.739(18) GUIDELINES FOR THE AUTHORIZATION OF ORGANIZATIONS ACTING ON BEHALF OF THE ADMINISTRATION, AS AMENDED BY RESOLUTION MSC.208(81).
- RESOLUTION A.789(19) SPECIFICATIONS ON THE SURVEY AND CERTIFICATION FUNCTIONS OF RECOGNIZED ORGANIZATIONS ACTING ON BEHALF OF THE ADMINISTRATION.
- RESOLUTION A.1071(28) GUIDELINES ON THE IMPLEMENTATION OF THE INTERNATIONAL SAFETY MANAGEMENT (ISM) CODE BY ADMINISTRATIONS.
- SOLAS CHAPTER XI-2 AND THE INTERNATIONAL SHIP AND PORT FACILITY SECURITY CODE (ISPS CODE).
- SURVEY GUIDELINES UNDER THE HARMONIZED SYSTEM OF SURVEY AND CERTIFICATION (HSSC), in its latest revision.

2. PURPOSE

2.1 The purpose of this Merchant Marine Notice is to guide Recognized Organizations (ROs), Recognized Security Organizations (RSOs), and ISM Operators on the procedures for a *change of Flag*, *change of Company (ISM)*, and *change of RO/RSO*. These guidelines are in addition to the authorizations given directly to ROs/RSOs as detailed in their respective Agreement Governing the Delegation of Statutory Certification with IMMARBE.

2.2 The terms used in this document are defined in the Code for Recognized Organizations (RO Code) and should be interpreted according to the definitions provided therein.



3. REQUIREMENTS

- 3.1 The RO/RSO shall not provide any service to a Belize-registered vessel until official authorization from the Administration has been received.
- 3.2 As such, the RO/RSO must submit a request for the necessary authorization directly to the Administration. This request should include a list of certificates to be issued on behalf of Belize, along with the scope of the survey, as detailed in Form [TDF-033](#), **Recognized Organization Survey Request**.
- 3.3 Regardless of whether there is a change in Flag, RO/RSO or Company, no vessel may be issued certificates if there are outstanding recommendations.
- 3.4 The RO/RSO shall promptly notify the Administration of any outstanding recommendations along with proposed corrective actions.
- 3.5 A vessel which is detained may not transfer RO/RSO until all deficiencies have been rectified and explicit authorization from the flag has been obtained.
- 3.6 Any deviation from this standard shall be communicated to the Belize Administration, Technical Department for consideration and relevant instructions as prescribed in Merchant Marine Notice [MMN-24-003](#) (in its latest revision), concerning *Guidance for the Issuance of Short-Term and/or Extended Certificates by Recognized Organizations*.

4. CHANGE OF FLAG SURVEY WITH NO CHANGE OF RO

- 4.1 At the time of a change of flag, if the due dates for surveys of existing certificates fall within the ± 3 months window, then the renewal/intermediate/periodical/annual surveys/audits, shall be carried out immediately.
- 4.2 If the change of flag is not accompanied by a change of Company, the surveys shall be limited in scope to the applicable annual survey.
- 4.3 If the change of flag is accompanied by a change in the ISM Company, the scope of surveys for safety equipment must be upgraded to that of the renewal survey.
- 4.4 Surveys for statutory certificates other than the safety equipment shall be conducted in line with annual surveys and intermediate audits as required.

5. CHANGE OF FLAG SURVEY WITH CHANGE OF RO

- 5.1 In the case of a change of Flag and change in RO, the scope of surveys/audits must meet the requirements for a renewal survey/audit.



6. CHANGE OF COMPANY

- 6.1 When there is a change in ISM Company/Operators, the owners/operators shall apply to the RO for the reissuance of relevant certificates.
- 6.2 Additionally, owners/operators must apply to the Administration through their designated office for new CSR, MSMC, and DMLC Part I Certificates to reflect the change in the ISM, as required by the DOC, ISM, ISPS audits, and MLC 2006 inspections.

7. CHANGE/TRANSFER OF RO AND/OR RSO.

Reference: RO Code 3.9.3 concerning Cooperation between ROs

- 7.1 Responsibilities of the gaining Recognized Organizations and Recognized Security Organizations.
 - 7.1.1 Prior to accepting any request for a transfer of vessel certification, the gaining RO/RSO shall notify IMMARBE of such a request by providing the general particulars of the Company and vessel and details of the survey/audit requested using Form **TDF-033 Recognized Organization Survey Request**.
 - 7.1.2 The gaining RO must review all existing certificates and documentation to ensure that the ship's certificates have not been withdrawn or invalidated by IMMARBE or the losing RO.
 - 7.1.3 All outstanding recommendations given by the losing RO must be followed up and rectified before the transfer, unless otherwise agreed by IMMARBE.
 - 7.1.4 Any major non-conformity must be closed out or downgraded by the losing RO.
 - 7.1.5 No transfer of certification shall be performed by the gaining RO without conducting the necessary surveys/audits.
 - 7.1.6 The surveys/audits conducted by the gaining RO must address all elements of the relevant Conventions, Codes, Statutory Instruments, Circulars, Merchant Marine Notices and the Belize Merchant Ships (Registration) Act (in its latest revision), as adopted by the Administration.
 - 7.1.7 If the transfer of certification occurs within the \pm 3-month window of the mandatory surveys/audits, those mandatory surveys/audits shall be conducted at that time.
 - 7.1.8 If the surveys/audits are not successful, the transfer of certification shall be considered invalid. The gaining RO shall inform IMMARBE immediately with a full explanation of the reasons for such failures.



7.2 RESPONSIBILITIES OF THE LOSING RECOGNIZED ORGANIZATIONS AND RECOGNIZED SECURITY ORGANIZATIONS

7.2.1 In the case of transferring certification from one RO to another, the losing RO shall, without undue delay, provide the gaining RO with access to the ship's history file, which must include:

1. Any overdue surveys.
2. Any overdue recommendations or conditions.
3. Any operating conditions issued against the ship.
4. Any operating restrictions issued against the ship; and
5. Relevant technical information, including drawings, plans, and documents, as per the applicable guidelines developed by the Organization.

7.2.2 Upon transfer of RO, the losing RO shall cancel the issued certificates and transfer all relevant documentation to the gaining RO.

8. NEW CERTIFICATES

8.1 New certificates can be issued by the gaining organization only after all surveys/audits have been satisfactorily completed and all recommendations or overdue conditions of class previously issued in respect of the ship have been completed as specified by the losing organization.

8.2 All certificates shall be maintained according to the *Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), in its latest revision*, regarding the validity of statutory certificates.

9. MIXING OF RECOGNIZED ORGANIZATIONS (RO)

9.1 The Belize Administration does not permit the mixing of ROs except in cases where one RO is responsible for all Statutory Certificates and another is responsible for DOC, SMC, ISSC audits, MLC 2006, and CICA inspections.

EXCEPTION:

9.2 If a new vessel is registered with an existing fleet under our flag, it may use the fleet's current DOC, even if it differs from the RO/RSO that issued the SMC, ISSC, MLC 2006, CICA certifications.

9.3 If a vessel in an existing fleet uses a Document of Compliance (DOC) that differs from the fleet's DOC, the Owner must contact the RO to update the vessel's DOC to align with that of the fleet.



9.4 The DOC issued shall comply with the requirements of the International Management Code for the Safe Operation of Ships and for Pollution Prevention (ISM Code) for the types of ships.

10. REPORTING

10.1 In accordance with [MMN-23-003](#), (in its latest revision), Reporting on Statutory Surveys and Certification Status to IMMARBE, statutory survey reports and certificates for changes in Flag, RO, RSO, ISM Company surveys/audits must be submitted to the Belize Administration as soon as possible. These submissions can be made either electronically or via access to the Society's database.

11. FEES

11.1 Fees will be in accordance with Merchant Marine Notice [MMN-24-005](#), in its latest revision.

12. ACTIONS REQUESTED

12.1 The Administration encourages Shipowners, Operators, Deputy Registrars, Recognized Organizations, and Recognized Security Organizations to review and comply with the contents of this Notice and to ensure that its provisions are enforced on vessels registered with IMMARBE.

13. DISCIPLINARY MEASURES

13.1 Failure to adhere to the requirements outlined in this Notice may result in disciplinary action as deemed appropriate by IMMARBE. This may include, but is not limited to:

- Suspension or revocation of the vessel's certification.
- Imposition of fines or penalties.
- Restrictions on the vessel's operations or trading activities.
- Other legal actions as specified under the Belize Merchant Ships (Registration) Act (in its latest revision) and Statutory Instrument 56 of 1999 (as revised).

It is imperative that all parties adhere fully to the procedures and requirements to ensure proper certification and avoid any regulatory issues.

We respectfully request that you review this Notice carefully and adhere to its guidance.



Merchant Marine Notice MMN-24-007

IMMARBE appreciates your cooperation and assistance.

This notice was issued in Belize City, Belize on 23 September 2024.

Eduardo
Signature

2024.09.27
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Date:

2024.09.27
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Eng. Eduardo Simon
Technical Manager
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Valarie Lanza (Mrs.)
Senior Deputy Registrar
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Any queries related to this Notice should be directed to technicalservices@immarbe.com.