



Office of  
Deputy Commissioner  
of Maritime Affairs

THE REPUBLIC OF LIBERIA  
LIBERIA MARITIME AUTHORITY

Marine Notice

ADM-009  
Rev. 09/24

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

**SUBJECT: Implementation of the phrases “To the satisfaction of the Administration” and “Requirements of the Administration” in IMO Instruments; and the Application of Non-Mandatory IMO Instruments**

**References:** (a) **Maritime Regulation 2.35**  
(b) **III Code, as amended**  
(c) **MSC-MEPC.2/Circ.19**

**PURPOSE:**

This Notice provides guidance to vessel owners, operators, managers and recognized organizations (RO's) on compliance with the Administration's policy with regard to implementation of the phrases, “To the satisfaction of the Administration” and “Requirements of the Administration” in International Maritime Organization (IMO) Instruments.

It also provides the Administration's policy with regard to the Application of Non-Mandatory IMO Instruments.

**APPLICABILITY:**

This Notice applies to all ships registering or registered with this Administration.

**1.0 Requirements**

- 1.1 Paragraph 16.5 of the **III Code, as amended**, requires that, “A flag State should establish resources and processes capable of administering a safety and environmental protection programme, which, as a minimum, should consist of...the development, documentation and provision of guidance concerning those requirements found in the relevant international instruments that are to the satisfaction of the Administration.”
- 1.2 To assist Member States in the implementation of the **III Code, as amended**, in relation to the IMO Member State Audit Scheme (IMSAS), IMO approved the *Guidance in relation to the IMO Member State Audit Scheme (IMSAS) to assist in the implementation of the III Code by Member States* (III Code Implementation Guidance) (**MSC-MEPC.2/Circ.19**).
- 1.3 This Administration, by this Marine Notice, advises that it has followed and made mandatory, section 2.4 of **MSC-MEPC.2/Circ.19**.

## **2.0 To the satisfaction of the Administration” and “Requirements of the Administration”**

- 2.1 Where the term ‘to the satisfaction of the Administration’ or ‘requirements of the Administration’ is used in IMO instruments, the Administration in such cases will apply the Unified Interpretations and Circulars adopted by IMO; and in their absence, will apply available Unified Interpretations, Requirements and Recommendations of the International Association of Classification Societies (IACS); international standards adopted by the International Organization for Standardization (ISO) and International Electrotechnical Commission (IEC); or other internationally recognized standards.
- 2.2 If guidance is not available in 2.1 above, the Administration will contact its authorized RO’s for its recommendation.
- 2.3 For cases not covered by 2.1 or 2.2 above, the Administration on a case-by-case basis will develop and advise its own interpretation or recommendation through a Marine Notice, Marine Operations Note, Marine Advisory or other means as may be necessary.

## **3.0 Application of Non-Mandatory Instruments**

- 3.1 IMO Resolutions and Circulars contain non-mandatory provisions that provide guidelines as recommendations covering a broad range of matters.
- 3.2 In case a ship does not meet or is not capable of meeting the provisions in the non-mandatory instrument, the RO should communicate to the Administration the level of compliance taking into consideration risk evaluation and/or ability to provide an equivalent level of safety/compliance through any alternative design and arrangement.
- 3.3 In case the Administration requires that a non-mandatory provision be made mandatory, it will communicate same to the RO’s through publication of a document.

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