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## TRAFFIC MANAGEMENT PLAN (MARINE)

3	15/08/2016	Updated based on changes to project configuration	MFC		
2	22/04/2015	Response LSP's Comments	ERM	See attachment of reviewer's signature	
1	25/02/2015	Response LSP's Comments	ERM	See attachment of reviewer's signature	
0	14/01/2015	Issue For Review	ERM	See attachment of reviewer's signature	
REV.	DATE (dd/mm/yyyy)	DESCRIPTION	PREPARED	CHECKED	APPROVED


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#### ATTACHMENT OF REVIEWER'S SIGNATURE

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4	Kitti Phadungchiwit	Manager of Package A	
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## REVISION LOG

Rev.	Date (dd/mm/yyyy)	Revised Detail			
		Item	Page	Article	Description
0	14/01/2015	all	all	all	Issue For Review
1	25/02/2015	all	all	all	Response LSP's Comments
2	22/04/2015	all	all	all	Response LSP's Comments
3	16/08/2016	all	all	all	Updated based on changes to project configuration


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## ACRONYMS


ASP	Air Separation Plant
BOC	Balance of Complex
CTU	Central Utility Plant
EHS	Environmental, Health and Safety
ESIA	Environmental and Social Impact Assessment
HDPE	High Density Polyethylene
HSE	Health, Safety and Environment
HSSE	Health, Safety, Security and Environment
IFC	International Finance Corporation
IMO	International Maritime Organisation
ISM	International Safety Management
LLDPE	Linear Low Density Polyethylene
LSP	Long Son Petrochemicals
MONRE	Ministry of Natural Resources and Environment
MP	Management Plan
PINAC	Permanent International Association of Navigation Congresses
PP	Polypropylene
SMP	Safety Management Plan
SOLAS	Safety of Life at Seas
QCVN	National Technical Regulation

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## DISCLAIMER

It is upon the Contractor to solicit, acquire and comply with all information, laws, rules, regulations, and Applicable Standards which is/are necessary and/or required for and applicable to the Contractor's performances of the works hereunder.

The Contractor hereby agrees and acknowledges that the Employer makes no representation or warranty, express or implied, regarding the accuracy or completeness of any or all information, laws, rules, regulations, and Applicable Standards which is/are necessary and/or required for and applicable to the Contractor's performances of the works hereunder. THE EMPLOYER HEREBY EXPRESSLY DISCLAIMS ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ALL RESPECTS, and the Contractor agrees that neither the Employer nor any of its affiliate(s), director(s), officer(s), employee(s), consultant(s), professional advisor(s), and duly authorised representative(s) shall have any liability to the Contractor or any of its affiliate(s), director(s), officer(s), employee(s), consultant(s), professional advisor(s), and duly authorised representative(s) in any way relating to those information, laws, rules, regulations, and Applicable Standards which is/are necessary and/or required for and applicable to the Contractor's performances of the works hereunder or the Contractor's or its affiliate(s)', director(s)', officer(s)', employee(s)', consultant(s)', professional advisor(s)', and duly authorised representative(s)' reliance thereupon and/or use thereof.

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## 1 INTRODUCTION

### 1.1 PURPOSE AND SCOPE

The purpose of this Traffic Management Plan (Marine) is to set out *[insert contractor name here]* approach to manage and mitigate the residual impacts of marine traffic that they have control over, as identified in Chapter 18 of the project's Environmental and Social Impact Assessment (ESIA) and the Long Son Petrochemical's (LSP) Construction Health, Safety and Environment Management Plan (ref: LSP-1S01-005).

It should be noted the information in this Traffic MP (Marine) is based on relevant regulations, guidelines and standards at the time of writing of the ESIA dated December 2014. Should the contractors activities change or new regulations, guidelines or standards apply the contractor will review, amend and resubmit this Traffic MP (Marine) to LSP.


*[Note to contractor: If your onsite activities are not associated with traffic (marine), you do not need to complete this template but you will need to provide justification that your activities are not associated with the sources of marine traffic impacts detailed in Section 1.3]*

### 1.2 PROJECT OVERVIEW

The Long Son Petrochemicals Complex Project is located in Hamlet 2 and Rach Gia Hamlet, Long Son Commune, Vung Tau City, Ba Ria – Vung Tau Province, Vietnam. The Complex is spread over 464 ha, including area for its future expansion. The Project will be comprised of two (2) main components:

**1) The Petrochemical Plant**, which consists of the following plants and units:

- Main Production Plants
  - Olefins Plant
  - High Density Polyethylene (HDPE) Plant
  - Linear Low Density Polyethylene (LLDPE) Plant
  - Polypropylene (PP) Plant
- Supporting Units
  - Central Utility Plant (CTU) (contains a Steam Generation Unit and Water Plant)
  - Tank Farm
  - Common Infrastructure

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**2) The Seaport**, which consists of the following components:

- Hydrocarbon Jetty - to transfer feedstock and product for the Petrochemical Plant
- Construction Jetty - to import construction materials, including heavy lift modules.

The total land area that will be acquired for the Project is 464 ha, consisting of 398 ha for the Complex, and 66 ha for the specific port. In addition, there is a total water surface area of 194 ha that will be acquired for the seaport.

### 1.3 SOURCES OF TRAFFIC (MARINE) IMPACTS

The potential sources of traffic (marine) impacts are associated with the following activities:

- Mobilisation and demobilisation of the vehicles and machines to and from the site for land development;
- Transport of filling materials to the site;
- Moving of vessel/barge during construction of jetties and
- Transport of construction materials and equipment to the site.

The construction schedule for the sources of traffic (marine) impacts is shown in Annex A.


*[Note to contractor: Contractor to insert Gantt chart of construction schedule in Microsoft Project Office format in Annex A, which should include a breakdown of the tasks associated with the sources of traffic (marine) impacts, as noted above]*

### 1.4 APPLICABLE STANDARDS


The applicable traffic (marine) standards during construction are as follows:

- Vietnam Maritime Code, 2005;
- Circular 27/2011/TT-BGTVT: Apply modified and supplemented in 2002 by the International Convention for the Safety of Life at Sea 1974 issued by the International Code vessel security and seaport;
- Circular No. 07/2015/TT-BGTVT on aids to navigation and notices to mariners;
- Circular No. 34/2015/TT-BGTVT on maritime accident reporting and investigation;



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- Decree No. 21/2012/ND-CP on management of seaports and navigable channels;
- Decision No. 707/QD-BGTVT on implementation of SAR 79;
- Circular No. 19/2013/TT-BGTVT on the International Regulations for the Prevention of Collisions at Sea
- International guidelines including those produced by the International Maritime Organization (IMO), the Permanent International Association of Navigation Congresses (PINAC), the Convention for Safety of Life at Seas (SOLAS), the International Convention for the Prevention of Pollution From Ships (MARPOL) and International Maritime Dangerous Goods Code (IMDG); and
- Internal Finance Corporation (IFC) General EHS Guidelines (3.4): Traffic Safety.

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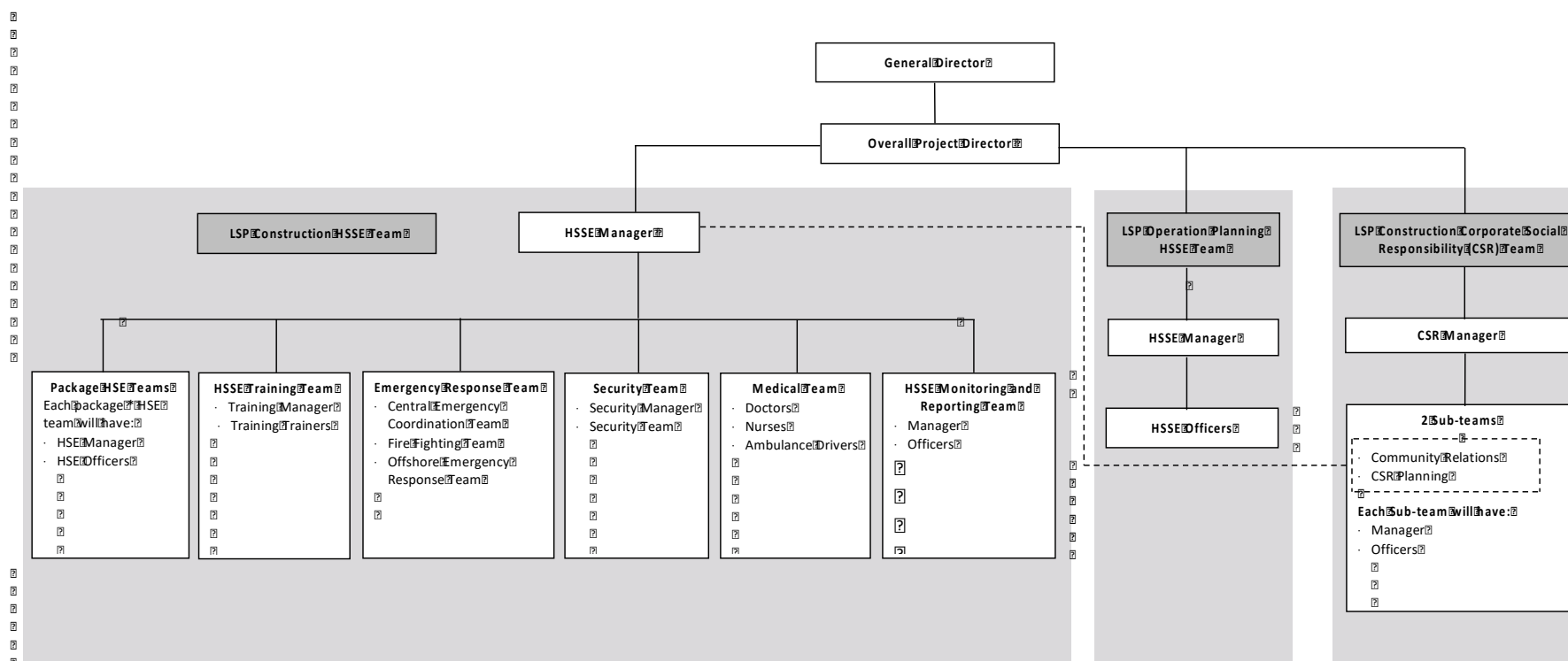
## **2 ROLES AND RESPONSIBILITIES**

### **2.1 INTRODUCTION**

Having an appropriate organisational structure in place, with all people having defined roles and responsibilities, is essential to ensuring the overall success of this Traffic MP (Marine). This section provides details of LSP's and the contractor's organisational structure with regards to onsite delivery of the LSP project, and the various roles and responsibilities of those people in relation to delivering the clients EHS expectations, including meeting the requirements of the Construction Health, Safety and Environment Management Plan.


### **2.2 LSP CONSTRUCTION HSSE TEAM**

LSP's health, safety, security and environmental (HSSE) team will lead the management of HSSE issues concerned with traffic (marine). The LSP organisational chart to implement the requirements of this Traffic MP (Marine) is shown in the figure below. The specific roles and responsibilities are shown in Chapter 5 of the LSP Construction Health, Safety and Environment Management Plan (ref: LSP-1S01-005).



#### Note:

- Package A: Defines Plant, Tank Farm, Complex Interconnecting pipelines/pipe racks, Land development in tank farm area, Topside facilities in hydrocarbon jetties, Complex Wastewater treatment Unit and HP Flare/LP Flare system
- Package B/C/D: Polyolefins Plant (HDPE/PP/LLDPE)
- Package F: Sea Port (excluding Topside in the hydrocarbon jetties and construction jetty which are under the scope of the Contractor Package A and Package B respectively)
- Package G: Central Utility Plant (including Steam Generation Unit and Water Plant)
- Package H: Common infrastructure in the complex (including Administration Building, Laboratory Building, Canteen Building, Emergency Center, First Aid Center and Polyolefins Product Warehouse)
- Package I: Complex Road including drainage, Street lighting, CCTV, Green Area, Topside for construction jetty, Complex truck scale, and Blowdown system
- Package L: Land development work in the whole complex except tank farm area

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### 2.3 CONTRACTORS HSSE TEAM


The contractors HSSE team has established this Traffic MP (Marine) in accordance with the applicable standards. The contractors HSSE team will manage their contractors and suppliers in accordance with this Traffic MP (Marine) and liaise with the appropriate personnel within LSP's HSSE to ensure compliance with the overall aims of LSP's Construction Health, Safety and Environment Management Plan (ref: LSP-1S01-005).

The contractors onsite organisational chart to implement the requirements of this Traffic MP (Marine) is shown in the figure below.

*[Note to contractor: Contractor to insert organisational chart for onsite team].*

### 2.4 DESCRIPTION OF ROLES AND RESPONSIBILITIES


The contractor has committed to providing the necessary human resources to ensure that the organisational structure noted above can work to implement this Traffic MP (Marine) and achieve compliance with all relevant standards. A description of the key roles and their responsibilities are provided in the *Table 2.1*, including the primary communication channel between LSP and contractor HSE teams. Employee contact details for each role associated with this Traffic MP (Marine) are provided in Annex B.

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**Table 2.1**      *EHS Roles and Responsibilities within Contractor's Project Team*

Role	Responsibilities
General Manager (Contractor)	
Senior Site Engineer (Contractor)	
Site Supervisor / Foreman (Contractor)	
Site EHS Officer (Contractor)	
Emergency Response Co-ordinator (Contractor)	
[Other]	
[Other]	

[Note to Contractor: Insert a description of the responsibilities of each role, with regards to the management of EHS and traffic (marine). Delete roles that are not appropriate. Include additional roles where required.]

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### 3 *MITIGATION / MANAGEMENT PROCEDURES*

The mitigation/management procedures noted in this section provides the approach to managing marine traffic impacts during construction. The contractor is committed to implementing the identified mitigation / management procedures in order to not cause exceedance of the applicable marine traffic standards, and to avoid impacts on the local community.

The mitigation/management measures that are relevant to *[insert contractors name here]* onsite activities are shown in *Table 3.1*.


The mitigation/management procedures were identified within the ESIA as being appropriate for the environmental impacts resulting from the anticipated construction activities. Should marine traffic impacts arise from the contractors activities, following the implementation of the procedures noted in *Table 3.1*, the contractor will review the need for additional measures to be taken and update this Traffic MP (Marine) accordingly.

*Note to contractor: Delete mitigation / management measures which are not applicable or outside of your control. Insert the name of the responsible party from Table 2-1 for each mitigation / management measure.*

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**Table 3.1 Mitigation / Management Procedures**

Aspect, Potential Impact / Issue	Mitigation Reference	Mitigation and / or Management Procedures	Contractors Responsibility	Related Plans
Impacts of Marine Traffic during the Construction Phase	1.1	All shipping and anchoring activities shall be undertaken in accordance with Vung Tau Port Authority guidelines and instructions.		
	1.2	The EPC Contractor will ensure that, prior to mobilisation, any vessel undertaking work activity for the Project in Vietnamese coastal waters complies with Vietnamese Marine Standards, IMO Standards and MARPOL regulations and, as appropriate, PIANAC, SOLAS and IMDG.		
	1.3	The EPC Contractor will ensure that all vessels have correct and up to date insurances in accordance with regulations.		
	1.4	The EPC Contractor will prepare a Maritime Safety Management Plan (SMP) in accordance with the requirements of the IMO's International Safety Management Code (ISM), which provides an international standard for the safe management and operation of vessels, including pollution prevention. A summary of those requirements are presented in Annex D, although when drafting the SMP the Contractor will refer to the IMO's original documentation.		
	1.5	The EPC Contractor will prepare a Maritime Safety Assurance Plan shall be prepared in accordance with Decree No. 21/2012/ND-CP of March 21, 2012. The plan will include but not be limited to the following: <ul style="list-style-type: none"> <li>a) Identify safety risks arising from marine construction works and required control measures.</li> <li>b) Safety issues relating to Simultaneous Operations (SIMOPS) where external contractors are also operating in the same area.</li> <li>c) Vessel movements including loading and unloading of materials and equipment.</li> <li>d) Traffic flow management.</li> <li>e) Temporary navigation systems installed during construction works.</li> <li>f) Communications methods.</li> </ul>		

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Aspect, Potential Impact / Issue	Mitigation Reference	Mitigation and / or Management Procedures	Contractors Responsibility	Related Plans
	1.6	<p>The EPC Contractor will prepare a detailed Marine Traffic Management Procedure, which will include but not be limited to the following:</p> <ul style="list-style-type: none"> <li>a) Detailed maps showing traffic separation schemes and details of buoying/lighting systems.</li> <li>b) Communications Procedure.</li> <li>c) A requirement that all vessels will: <ul style="list-style-type: none"> <li>• Proceed in the appropriate lane in the direction of traffic flow for that lane;</li> <li>• Keep clear of a traffic separation lines or separation zones;</li> <li>• Navigate with particular caution in areas where traffic lanes terminate or where there is a precautionary area;</li> <li>• Prohibit vessels anchoring in access channel area, at or near its termination;</li> <li>• Prohibit vessels entering a separation zone or cross a separation line except in case of emergency or to avoid immediate danger; and</li> <li>• Prohibit vessels impeding the safe passage of a large vessel following the traffic lane.</li> </ul> </li> </ul>		
	1.7	The EPC Contractor will continually review the vessel traffic conditions and update the vessel management planning to ensure safe navigation to avoid and minimise the environmental consequences of marine accidents, including groundings, collisions and the increased risks resulting from higher traffic levels and congested waters.		
	1.8	Shipping channels shall be indicated by buoys and shall be in accordance with the Vung Tau Port Authority guidelines.		
	1.9	Where vessels movements or night operations are likely to take place channel marking shall include lights and shall be in accordance with the Port Authority guidelines.		



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## 4 MONITORING

### 4.1 LSP HSSE TEAM

A environmental monitoring plan has been developed to track the effectiveness of the mitigation measures during construction. Details of LSP's environmental monitoring plan are provided in Chapter 7 of LSP's Construction Health, Safety and Environment Management Plan (ref: LSP-1S01-005).


LSP may request additional monitoring if the monitoring programme records show non compliance with the safety plan and Marine Traffic Management Plan.

### 4.2 CONTRACTORS TEAM

In order to assess the effectiveness of the mitigation / management measures and identify the need for further action, the contractors traffic (marine) monitoring programme outlined in *Table 4.1* will be followed.


Should the monitoring programme note any non-compliances with the MP, corrective action will be taken to ensure the relevant activity returns to compliance in a timely manner and that any corrective action is appropriate and effective. Any corrective actions undertaken must be recorded on the daily report against the relevant activity.

*Note to contractor: Delete rows that are not applicable or outside of your control and, in the second column, only include the reference to relevant mitigation / management measures. Insert the name of the responsible party from Table 2-1 for each of the separate monitoring requirements.*

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**Table 4.1 Monitoring Programme**

Aspect, Potential Impact / Issue	Reference of Relevant Mitigation Measure *	Sampling Location	Sampling Parameters	Sampling Frequency	Applicable Standards	Responsibility	Reporting
Impacts of Marine Traffic	1.1, 1.7, 1.8, 1.9	Vessel movement under contractors control and project coastal waters	Visual inspection	Weekly	Vunt Tau Port Authority Guidelines, Maritime SMP, Maritime Safety Assurance Plan, Maritime Traffic Management Procedure		Weekly (refer to Annex C for report example)
	1.2, 1.3	Vessel movement under contractors control	Review of vessels international and national technical certificates and insurances	Prior to arrival in project waters and undertake weekly sampling of vessels in projects coastal waters	Vietnamese Marine Standards (see Section 1.4), IMO, MARPOL, PIANAC, SOLAS and IMDG		Included in contractual package from vessel owner / operator
	1.4	Preparation and review of Maritime SMP	Submission to Vung Tau Port Authority for approval	Submission of original prior to vessel mobilisation and reviewed monthly based on audit findings	IMO's ISM, Decree No. 21/2012/ND-CP of March 21, 2012		Maritime SMP
	1.5	Preparation and review of Maritime Safety Assurance Plan	Submission to Vung Tau Port Authority for approval	Submission of original prior to vessel mobilisation and reviewed monthly based on audit findings	Decree No. 21/2012/ND-CP of March 21, 2012		Maritime Safety Assurance Plan

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Aspect, Potential Impact / Issue	Reference of Relevant Mitigation Measure *	Sampling Location	Sampling Parameters	Sampling Frequency	Applicable Standards	Responsibility	Reporting
	1.6	Preparation and review of Maritime Traffic Management Procedure	Submission to Vung Tau Port Authority for approval	Submission of original prior to vessel mobilisation and reviewed monthly based on audit findings	Vietnamese Marine Standards (see Section 1.4), IMO, MARPOL, PIANAC, SOLAS and IMDG		Maritime Traffic Management Procedure

\* See Table 3-1 for mitigation measure.

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## 5 AUDITING AND REPORTING

An Auditing and Reporting Programme is required to ensure that the mitigation/management measures are appropriate in controlling the identified impacts from traffic (marine).

### 5.1 LSP HSSE TEAM

To ensure compliance with the requirements of this Traffic MP (Marine), internal inspections and audits will be undertaken by LSP. The LSP auditing and reporting programme is shown in Chapter 9 of the LSP Construction Health, Safety and Environment Management Plan (ref: LSP-1S01-005).


### 5.2 CONTRACTORS TEAM

The programme will comprise of the following:

- Internal Audit and Reporting Programme to be undertaken by the contractor's EHS Officer; and
- External Audit and Reporting Programme, to be conducted by the LSP's representative.


The scope of the internal auditing and reporting programme to be undertaken by the contractor is shown in *Table 5.1*.

*Note to contractor: In the second column, only include the reference to relevant mitigation / management measures. Ensure the job title for the responsible party is correct for your organisation.*

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**Table 5.1 Auditing and Reporting Programme**

Inspection / Auditing Interval	Reference of Relevant Mitigation Measure*	Responsibility	Scope of Inspection / Audit	Report Submission / Record Keeping
Weekly Inspection (Internal)	1.1, 1.2, 1.3, 1.7, 1.8, 1.9	Contractor's Onsite EHS Officer	Review the submitted weekly monitoring reports to assess the compliance status of relevant operations that may give rise to marine traffic impacts and provide support to identifying appropriate corrective actions and ensuring they are: introduced in a timely manner; appropriate; and effective	Archive Weekly Monitoring Report in an orderly manner for external auditing  All reports are to be maintained at the project site for as long as the Contractor is working at the site
Monthly Review of Weekly Inspection Reports (Internal)	1.1, 1.2, 1.3, 1.7, 1.8, 1.9	Contractor's General Manager	A monthly report is to be provided to the Contractor's Onsite General Manager, which is to include: the compliance status of relevant operations that may give rise to marine traffic impacts; identifying any non-compliances that have arisen over the previous months monitoring program; detailing the corrective actions that have been taken when a failure has been noted; and noting the appropriateness and effectiveness of any corrective actions	Archive Monthly Report in an orderly manner for external auditing  All reports are to be maintained at the project site for as long as the Contractor is working at the site


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Inspection / Auditing Interval	Reference of Relevant Mitigation Measure*	Responsibility	Scope of Inspection / Audit	Report Submission / Record Keeping
Maritime SMP, Maritime Safety Assurance Plan and Maritime Traffic Management Procedure(Internal)	1.4, 1.5, 1.6	Contractor's General Manager	Review Plans and Procedure prior to submission to Port Authority to ensure plans are in accordance with the relevant guidelines and to review content on a monthly basis and amend where necessary, based on audit findings	Maintain up-to-date copies of the Plans and Procedure, including correspondence with the Port Authority, for internal and external auditing  Superseded Plans and Procedures to be maintained at the project site for as long as the Contractor is working at the site
Biannual Inspection (External)	1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.7, 1.8, 1.9	LSP's Representative	LSP's Representative will review the contractor's onsite activities to assess compliance with the management plan and review all records of the Contractor's internal audit programme to review historic compliance and the use of appropriate corrective actions	A copy of the External Audit Report is to be provided to the contractor for reference and, where necessary, implementation of any identified corrective actions  All reports are to be maintained at the project site for as long as the Contractor is working at the site

\* See Table 3-1 for mitigation measure.


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***ANNEX A – CONSTRUCTION SCHEDULE FOR THE SOURCES OF TRAFFIC (MARINE) IMPACTS***

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*[Note to contractor: Contractor to insert Gantt chart of construction schedule in Microsoft Project Office format in Annex A]*




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***ANNEX B – EMPLOYEE CONTACT DETAILS ASSOCIATED WITH MANAGEMENT PLAN***

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Role	Responsibilities	Contact Details*
General Manager (Contractor)		<ul style="list-style-type: none"> <li>Mobile Number:</li> <li>Email:</li> </ul>
Senior Site Engineer (Contractor)		<ul style="list-style-type: none"> <li>Mobile Number:</li> <li>Email:</li> </ul>
Site Supervisor / Foreman (Contractor)		<ul style="list-style-type: none"> <li>Mobile Number:</li> <li>Email:</li> </ul>
Site EHS Officer (Contractor)		<ul style="list-style-type: none"> <li>Mobile Number:</li> <li>Email:</li> </ul>
Emergency Response Co-ordinator (Contractor)		<ul style="list-style-type: none"> <li>Mobile Number:</li> <li>Email:</li> </ul>
[Other]		
[Other]		

\*Any change in respect to employees, the contact details will need to amended as soon as the role has been reassigned.

[Note to Contractor: Insert a description of the responsibilities of each role, with regards to the management of EHS and traffic (marine). Delete roles that are not appropriate. Include additional roles where required.]


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### ***ANNEX C – WEEKLY REPORTING FORM***


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*[Note to contractor: The below table provides an example of the details to be included on a Weekly Reporting Form.]*

Date of Observation	Contact Details / Role of Individual Undertaking Monitoring	Details of Observation / Location	Mitigation Action to be Taken	Date Mitigation Action was Implemented

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***ANNEX D – EXAMPLE CONTENT FOR MARITIME SAFETY MANAGEMENT PLAN***

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*Note: For full guidelines refer to International Safety Management (ISM) Code 2010.*

### **Development of Plans for Shipboard Operations**

The contractor should establish procedures, plans and instructions, including checklists as appropriate, for key shipboard operations concerning the safety of the personnel, ship and protection of the environment. The various tasks should be defined and assigned to qualified personnel.

### **Emergency Preparedness**

The contractor should identify potential emergency shipboard situations, and establish procedures to respond to them.

The contractor should establish programmes for drills and exercises to prepare for emergency actions.

The safety management system should provide measures ensuring that the contractor can respond at any time to hazards, accidents and emergency situations involving its ships.

### **Reports and Analysis of Non-Conformities, Accidents and Hazardous Occurrences**

The maritime safety management system should include procedures ensuring that non-conformities, accidents and hazardous situations are reported to the contractor, investigated and analysed with the objective of improving safety and pollution prevention.


The contractor should establish procedures for the implementation of corrective action, including measures intended to prevent recurrence.

### **Maintenance of the Ship and Equipment**

The contractor should establish procedures to ensure that the ship is maintained in conformity with the provisions of the relevant rules and regulations and with any additional requirements which may be established by LSP.

Company should ensure that:

- Inspections are undertaken at appropriate intervals;
- Any non-conformity is reported, with its possible cause, if known;
- Appropriate corrective action is taken; and

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- Records of these activities are maintained.

The Company should identify equipment and technical systems for the sudden operational failure of which may result in hazardous situations. The procedures should provide specific measures aimed at promoting the reliability of such equipment or systems

Inspections above should be integrated into the ship's operational maintenance routine.

### **Documentation**

The contractor should establish and maintain procedures to control all documents and data which are relevant to the maritime safety management system.

The contractor should ensure that:

- Valid documents are available at all relevant locations;
- Changes to documents are reviewed and approved by authorized personnel; and
- Obsolete documents are promptly removed.

The documents used to describe and implement the maritime safety management system may be referred to as the Safety Management Manual. Each ship should carry on board all documentation relevant to that ship.

### **Company Verification, Review and Evaluation**

The Company should carry out internal safety audits on board and ashore at intervals not exceeding six months to verify whether safety and pollution-prevention activities comply with the maritime safety management system. In exceptional circumstances, this interval may be exceeded by not more than twelve months.