

2018 COLLECTIVE RECOMMENDATIONS

QACE 2019 ANNUAL REPORT - ANNEX C

1/ The auditing of the effectiveness RO's control over surveyor resources.

As a natural reaction to the industries recession and the downturn in work, some of the larger ROs have reorganised and significantly reduced their head-count. Offices have been closed and more surveyors work remote from offices. The recession has also reduced the available revenue which has led to cost cutting and which can put pressure on the available monies and resources to support the highest standards. This comes at a time when many organisations, including flag States, have also reduced their technical capabilities and staff, which might result in an overreliance on the recognised organisations.

There are several related issues that QACE is including in its assessments during 2018, confirmation that locations still have sufficient resources to service the workload and that, when new projects are generated and workloads return to previous levels, that sufficient surveyors will be available, competent and authorised to service the new work. This is particularly relevant to plan approval and new construction surveyors.

QACE is looking for the RO's to include these issues in their risk mitigation, the necessary flexibility and planning to react quickly, when the market emerges from recession, to have adequate resources in place.

2/ The auditing of the effectiveness of RO's controls over non-convention ships.

'While the responsibility for the standard and safety of ships lie with the owners and flag State, instances have been reported where non-convention ships have been involved in incidents. In some cases, ships, under pressure because of poor maintenance have moved to local, national service, dropping their statutory certification. While the RO's responsibilities are limited to the classification of these ships, the associated risks should be incorporated into the RO's fleet management and controls.'

3/ The effectiveness of the report checking process.

With more and more regulatory requirements increasing the complexity of the work it is difficult for surveyors to get the reporting of surveys and audits right first time. Survey checklists have become increasingly important. The ROs reporting and surveyor support systems need to be constantly updated. As a result, reporting errors are a common audit finding, calling into question the effectiveness of the report checking or verification process.

4/ Implementation of Water Ballast Management requirements.

The Water Ballast Management (WBM) requirements came into force on 8th September 2017. Which was then extended another two years. A lack of take up of WBM systems is largely due to the costs and difficulties involved and that, provided certain requirements are satisfied, exemption can be granted by the flag Administration for de-harmonisation of the IOPP Certificate. Examples of submissions indicate common failures. The auditors have been

trained in the requirements, the surveying and approval requirements and the evidence that should be expected.