

2024 FOCUS AREAS - GUIDANCE NOTE

Introduction

The procedure in Section J3 of Volume 3 has been used, for the identification and development of the Focus areas for 2024 by Operations Centre (OC). Risk-based thinking was followed, taking into account input from the following:

- a) OC analysis of three years ACB audit findings and the trends analysis on the findings
- b) Feedback from ACBs
- c) Comments received from QACE
- d) Specific issues, if any, raised by AVC and considered by Council
- e) New requirements including changes in IACS CSR, URs, PRs & Uis
- f) Changes in statutory requirements
- g) Developments in ISO 9001/QMSR

The following three Joint IACS-QACE Focus Areas have been drawn up, in accordance with the procedure J3 in Volume 3, in consultation with QACE, ACBs and QC members.

FOCUS AREAS FOR 2024

1. Safety of Surveyors (including latest version of PR 37 Procedural Requirement for Confined Space Entry, Rev.3 entry into force 1 January 2024) risk identification and mitigation, safety training relating to hazards including but not limited to confined space entry, working at height, boat transfers, survey and testing of pressurised systems etc., safety refresher training, reporting of accidents / incidents, near misses, lessons learned etc.

Logic for FA: Entry into force of PR 37 Rev.3 from 1 January 2024, 3-year trend analysis of audit findings relating to confined space safe entry, identification during 2024 of safety related observations by QACE, the OC and safety related findings of ACBs.

2. Maintenance of Ships and Equipment (Including PR9 ISM Code (Clause 10 Maintenance of the Ship and Equipment), PR1C Postponement of periodical surveys, CSM items and COCs, PR 33 Owners Hull Inspection and maintenance scheme and PR 35 Procedure for Imposing and Clearing Recommendations/Conditions of Class).

Logic for FA: Continued Focus Area from 2023 based on observations by OC and findings in 2023- and 3-year trend analysis of PSC detention cases;

3. ISM, (PR9 ISM Code), in particular effectiveness of SMC audits in general and verification of implementation of cyber security requirements through company SMSs.

Logic for FA: Analysis of QACE and ACB findings relating to “shortcomings” in SMC audit execution, re Cyber Security findings relating to the effective verification of implementation of cyber security requirements into company SMSs.

GUIDANCE ON 2024 FOCUS AREAS

General - Implementation

- IACS Annual Focus Areas should be verified by ACBs during a year's audit program.
- The ACB auditor shall explain the annual focus areas during each opening meeting.
- The ACB auditor shall confirm the results of the focus areas during each closing meeting.
- The status of implementation of annual focus areas shall be explicitly commented on within ACB audit reports.
- The IACS OC observer shall verify that the annual focus areas are robustly audited by the ACB auditors during observed audits.
- The status of implementation of annual focus areas will be included in the annual QMR.

The following points are recommended as guidance when following the audit trails related to the Focus Areas:

- **Safety of Surveyors (including latest version of PR 37 Procedural Requirement for Confined Space Entry, Rev.3 entry into force 1 January 2024) risk identification and mitigation, safety training relating to hazards including but not limited to confined space entry, working at height, boat transfers, survey and testing of pressurised systems etc., safety refresher training, reporting of accidents / incidents, near misses, lessons learned etc.**
 - The focus on Safety of surveyors is as result of increased number of findings raised during 2023 ACB audits and IACS observers' comments related to safety of surveyors.
 - The ACB auditor should verify how the CS is implementing the latest current requirements of PR37 in CS rules, procedures, survey instructions and training programs.
 - The ACB auditor should verify safe execution of surveys during the audits and that requirements of new PR37, Rev.3 were met (e.g. validity of Permit to Enter/ Permit to Work, safe limits for entry O₂, combustible gases limit, toxic vapours and gases limit, ozone level for ships BWT systems using ozone generators, functioning of ventilation throughout period the surveyor is inside confined space, working conditions inside the confined spaces etc).
 - The ACB Auditor should verify all mandatory and necessary training as required by each CS is performed as required, ensuring that e-learning is as effective as class room training / on the job training.
 - The ACB Auditor should verify how the IACS Occupational Health and Safety (OSH) Policy is implemented and reviewed by each CS during the annual ACB audits
 - The ACB Auditor should verify how the IACS Joint Safety Statement on Safety of Surveyors is implemented and reviewed by each CS during the annual ACB audits
- **Maintenance of Ships and Equipment (Including PR9 and ISM Code - Clause 10 Maintenance of the Ship and Equipment, PR1C Postponement of periodical surveys, CSM items and COCs, PR 33 Owners Hull Inspection and maintenance scheme and PR 35 Procedure for Imposing and Clearing Recommendations/Conditions of Class).**
 - During ACB audits, numerous findings are raised following PSC detention cases regarding maintenance of the ship. The ACB auditors should continue to focus on PSC detention cases, and the effectiveness of surveys/ISM related audits before, during and after the detentions.

- The ACB Auditor should verify the effectiveness of the CS related procedures regarding PSC surveys and ISM Code Additional ship and Additional / Annual Company DOC Audits focussing on PR 9 and ISM Code Clause 10 and if this was robustly audited by the CS/RO Auditors during regular ISM audits of the ship and Company prior to the detention.
 - The ACB Auditor should verify compliance with CS procedures regarding requests for postponement of periodical surveys (PR 1 C) including dispensation of class and statutory requirements and/or issuing of short-term certificates and determine if the safety of the ship is at risk due to postponement.
 - The ACB auditor should verify compliance with CS procedures regarding Imposing and clearing of COCs (PR 35), subsequent postponement of COCs and CSM items and determine if the safety of the ship is put at risk due to postponement.
 - The ACB auditors should verify compliance with CS procedures regarding compliance with Owners Hull Inspection and maintenance scheme (PR 33) during periodical surveys This should comply with the Company and Ships ISM related procedures.
- **ISM, (PR9 ISM Code), in particular effectiveness of SMC audits in general and verification of implementation of cyber security requirements through company SMSs.**
 - The ACB auditors should verify the effectiveness of SMC audits in general, and how effective the Company's internal audits are implemented on board the ships between periodical audits. The ACB auditor should verify how PR 33 is complied with as noted above.
 - The ACB auditors should verify for the ships in service (contracted before 01/01/2024) implementation of IACS Rec.166 and IMO resolution MSC.428(98) on Maritime Cyber Risk Management in Safety Management System (SMS) applicable on ships in service from 01/01/2021.
 - The ACB auditors should verify for the ships under construction (contracted on or after 01/01/2024) implementation of IACS UR E26 Cyber resilience and E27 Cyber resilience of on-board systems and equipment. Previous versions were withdrawn before entering into force and replaced with new revision entering into force on 01/01/2024.
 - The ACB auditors should verify during periodical DOC audits and onboard SMS audits (if the company decides to combine verification of implementation of SEEMP with ISM audits) for SEEMP Part III issued for ships in the company's fleet as stated in Resolution MEPC.347(78) GUIDELINES FOR THE VERIFICATION AND COMPANY AUDITS BY THE ADMINISTRATION OF PART III OF THE SHIP ENERGY EFFICIENCY MANAGEMENT PLAN (SEEMP) 6 and 7. and IACS Rec.175, Section 8.