

2023 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 2023 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 2023

1. Compliance with new IMO / IACS requirements entering into force including effective implementation in CS Rules, survey instructions, reporting systems and training, as appropriate. Particular attention should be given to present and planned emission control measures and IACS UR Z 29.

2. 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).

3. Technical Competence, Training and Maintenance of Qualifications (including PR 6 and PR 7 and verification of training and competence relating to UR Z 29 concerning remote surveys).

GUIDANCE ON 2023 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 the opening 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:

- **Compliance with new IMO /IACS requirements entering into force including effective implementation in CS Rules, survey instructions, reporting systems and training, as appropriate. Particular attention should be given to present and planned emission control measures and IACS UR Z 29.**
 - This is current Focus Area No.2 for 2022 and it is proposed to retain for 2023: new IMO decarbonization regulations are entering in force at 01/01/2023 e.g. SEEMP Part III, EEXI, C II etc. and IACS UR Z29 is new unified requirement which was also focus area in 2022.
 - The increased focus on air pollution globally means the maritime industry is taking significant steps to reduce its environmental footprint, decarbonisation being the latest and very significant initiative.
 - During MEPC 76 in June 2021, the IMO adopted amendments to MARPOL Annex VI, introducing an Energy Efficiency Design Index for existing ships (EEXI). The requirements will enter into force at 1st of January 2023. The EEXI is applicable for all vessels above 400 GT falling under MARPOL Annex VI.
 - The ACB auditor should verify how the CS is implementing the latest current requirements in CS procedures, survey instructions and training programs and how compliance with the CS fleet is verified.
 - The ACB auditor should verify during Plan approval and surveys how safety risks relating to alternative fuels (design, fabrication and integration of equipment for systems and ships to address the risks associated with decarbonisation) are addressed.
 - The ACB auditor should verify CS procedures, specific guidance and related survey records for compliance with new UR Z 29.
- **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 2022 audits, numerous findings were raised following PSC detention cases regarding maintenance of the ship. The ACB auditors should continue to focus on PSC detention cases

and 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 how robustly this is audited by the CS Auditors.

- 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).

3. Technical Competence, Training and Maintenance of Qualifications (including PR 6 and PR 7 and verification of training and competence relating to UR Z 29 concerning remote surveys).

Following 3-year trend analysis of audit findings relating to training, considering the ongoing decarbonisation agenda and feedback from audits relating to training, qualification, and development the ACB auditor should verify compliance with CS procedures for qualification of surveyors and plan appraisal staff assigned to carry out the surveys/appraisals related to services provided by CSs and in particular attention should be paid to:

- Services i.e. plan appraisal, surveys and certification related to manufacture, installation, testing of ships and equipment and new IACS/Statutory requirements e.g. Cyber resilience of ships URs E26 and UR E27, new requirements related to decarbonisation (e.g. EEXI, CII, SEEMP part III), BWMS installation UR F45 and remote surveys UR Z 29 etc.);
- Fleet growth/reduction, auditors should review the CSs data on fleet growth/reduction to identify possible areas of risk e.g. availability of sufficient suitably trained and qualified surveyors to manage rapid growth from newbuild/ToC in a ship type segment or lack of ships newbuild/ToC to gain experience and maintain qualifications in a given segment.