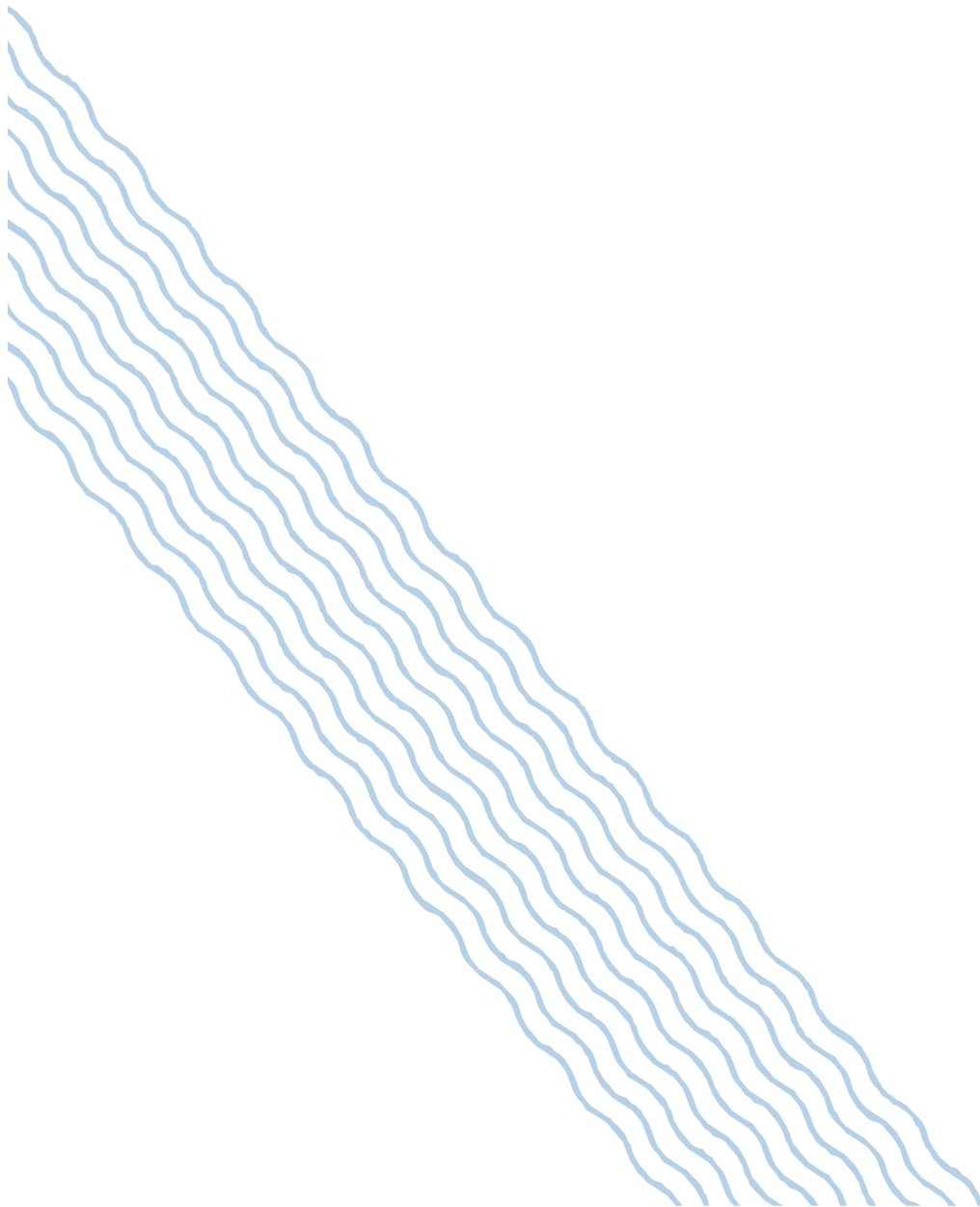# Annual Report 2022

Assessment of the EU
Recognised Organisations
Quality Management Systems

QACE

Quality Assessment
and Certification Entity

QACE Quality Assessment and Certification Entity

Annual Report 2022

Assessment of The EU Recognised Organisations Quality Management Systems

Table of Contents

I
Executive Summary

QACE completed, in 2022, another successful year of assessment and certification. The COVID pandemic did not restrict our travel significantly and therefore most of the assessments - 71 out of 90 - were completed onsite. The overall experience of remote assessments continued to be satisfactory.

The Board under the Chairmanship of, Mr. Ashok Mahapatra, successfully managed the operations of QACE. One of the Directors, Mr. Hui Xie, completed nine years of service as Director and was not eligible for re-election. In his replacement, Mr. Lars Lange was elected unanimously, as a Director at the Annual General Meeting held in December 2022, for a first term of three years.

Effective 31st December 2022, two assessors left the scheme completely and one assessor left partially. In 2022, QACE contracted four new assessors with significant experience in classification and statutory matters. They will commence their mentoring in 2023 before taking up assessments independently in 2023. With the aforesaid changes, the assessor strength has grown to nine, distributed in America, Asia and Europe.

In October 2022, one Member, Russian Maritime Register of Shipping, lost their EU recognition. Consequently, their QACE Membership and Certificate of Compliance were cancelled.

Türk Loydu, a classification society headquartered in Istanbul, Turkey, completed all the required assessments satisfactorily towards initial certification of their quality management system. They will be eligible to receive their Certificate of Compliance in early 2023, subject to their implementing satisfactorily the approved corrective actions to their audit findings. They will not be eligible to become a member of QACE at that time, as they are not yet an EU Recognized Organisation.

A significant development in 2022 was the initiation of the process towards the merger of the International Quality Assessment Review Board (IQARB) with QACE. The first stage of this integration was the inclusion of IQARB's budget within the QACE Budget 2023. This was approved at the QACE AGM held in December 2022. In continuation, the Chair of IQARB, Mr. Lars Lange, was elected, at the 2022 AGM, to join the Board of QACE. This merger process is expected to extend over the next two years.

II
Scope of Activities

The QACE Scope of Activities continues unchanged as defined in Article 11 of Regulation (EC) No 391/2009 of the European Parliament and the Council, on "common rules and standards for ship inspection and survey organisations", namely: "The assessment of the Quality Management Systems (QMS) of the EU Recognised Organisations (EU ROs) in accordance with the principles of ISO 19011:2011 *'Guidelines for auditing management systems'*, through the witnessed application of the ISO 9001:2015 and IACS Quality System Certification Scheme (QSCS) requirements by ISO 17021:2011 accredited certification bodies."

QACE complied with this scope by assessing the QMS of ROs through the audits by the Accredited Certification Bodies (ACBs). The audits verify the effectiveness of the processes, systems and controls of the Members in their classification and statutory certification services.

The audits also verify their compliance with the requirements of the international quality management standards ISO 9001, ISO 17020, IACS QMSR and other applicable international technical standards like the IMO Regulations & Codes and the IACS technical resolutions.

QACE   Interpretation   of   the International Quality Standards (QIQS) and QACE   Requirements (QRs) are also included in the scope of the audits held in 2022.

Independent, Transparent, Inclusive
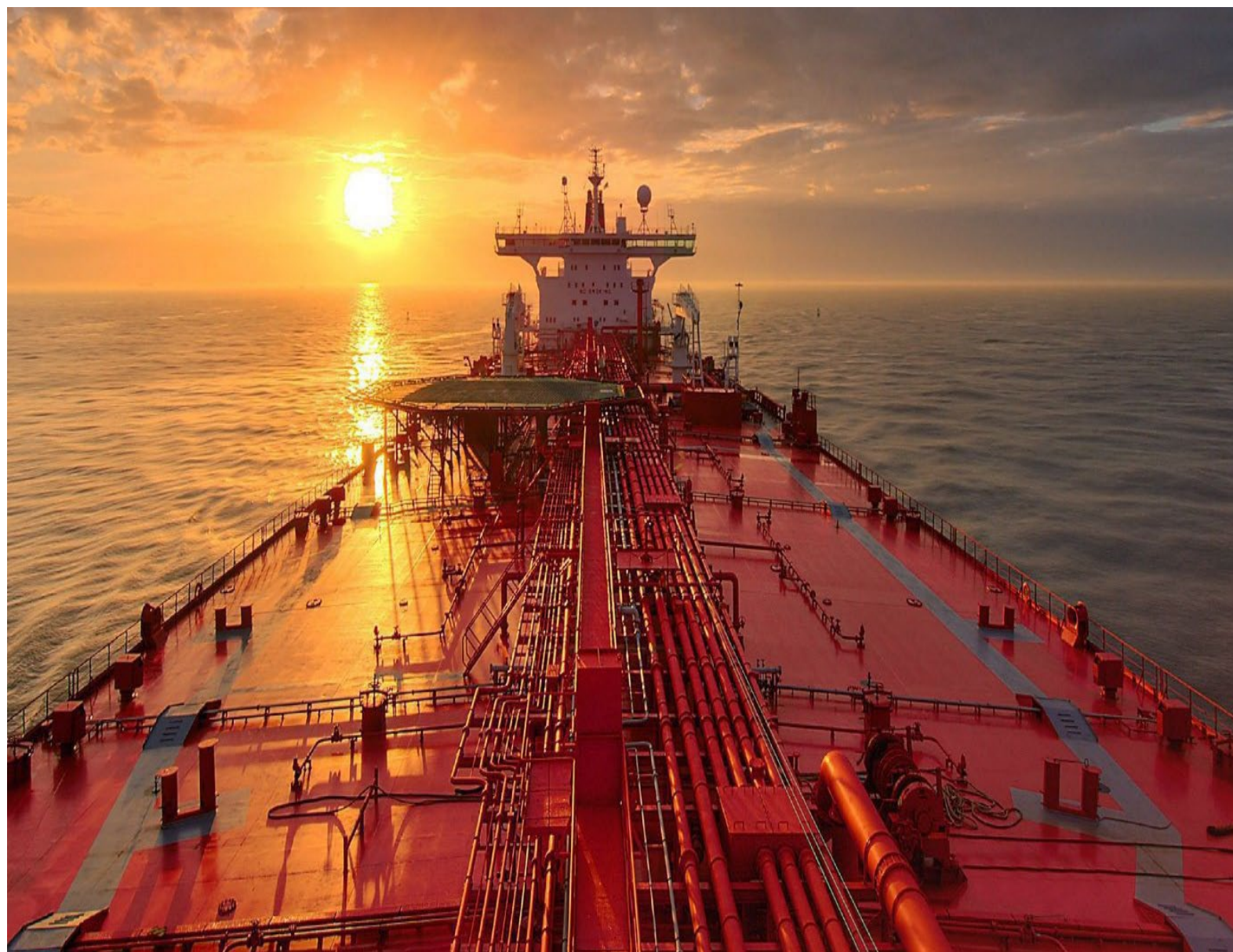
III
The 2022 Activities

The following activities were completed satisfactorily:

- Assessors' meeting to finalise the 2022 Assessment Plan, and to share experiences.

- Refresher training of Assessors in selected international regulations

- Assessments of selected ACB audits of the ROs Publication of

- Collective Recommendations

- Issuance of Individual Recommendations to four ROs

- Successful completion of the surveillance audit of QACE's QMS to ISO 9001:2015

- Completion of internal audit

- Development, jointly with IACS, of the Focus Areas for 2022

- Renewal of the certificates of compliance for four Ros

Apart from the above, the 2022 activity also included:

- Four Board meetings and the Members' Annual General Meeting

  - Two meetings with IACS
  - Attending IACS QC meeting
  - Attending IACS Auditor Seminar
  - Attending IACS End User Workshop
  - Attending IQARB Meetings

IV
2022 Assessment Activities

The main objectives of QACE's assessments are to ensure that the audits held by ACBs are robust and able to confirm the effectiveness of the quality management systems of the ROs.

The two-day Assessors' Meeting, held in January, finalised the year's Assessment Plan, identifying the locations, dates and types of audits for assessment. A risk-based approach is employed in the selection of assessment visits, tailored to each RO's fleet and activities. This plan is approved by the Board of Directors of QACE.

The basis for developing the QACE Assessment Plan is the annual audit program produced by the ACBs based on their own risk-based samples to audit, including newbuilding projects and ships in service undergoing major classification and statutory surveys.

Assessments are planned to be held at the ROs' Head Offices (HO), Control Offices (CO) (generally only large ROs have COs), Survey Locations (SL), Plan Approval (PA) Offices outside of Head Offices (generally only large ROs have such additional PA offices), and during Vertical Contract Audits (VCAs).

VCAs are held during ACB audits:

- Of surveys onboard ships in service (SiS) during major periodical and statutory surveys;

- Of surveys of New Construction (NC) projects;

- Of surveys of Machinery and Component;

- Of audits of the ISM process both on board ships and in the offices of ship management companies.

In 2022, the plan included assessments of 12 Member ROs. As stated earlier, the assessment of audits on the Russian Maritime Register of Shipping was aborted in October, thus only 11 Members were assessed satisfactorily.

In 2022, the assessments also included the audits of Türk Loydu, the classification society headquartered in Istanbul, Turkey. TL is a new applicant for the QACE Certificate of compliance, as a part of their EU Recognition application program. The EU Regulation (EC) No. 391/2009 Article 11.2 also requires the assessment and certification of organisations requesting recognition. Turk Loydu completed their audits and assessments satisfactorily.

In 2022, 90 audits were assessed as follows:

- ➤ 21 Survey Locations (SL)

- ➤ 6 Control Offices (CO)

- ➤ 12 Head Offices (HO)

- ➤ 7 Plan Approval Office(PL)

- ➤ 10 Vertical Contract Audits of New Construction.

➢ 6 Vertical Contract Audits of Machinery Component

➢ 23 Vertical Contract Audits of Ship in Service

➢ 5 Vertical Contract Audits of ISM

➢ *Independent, Transparent, Inclusive*

2022 ASSESSMENTS

ABS

First Date	Last Date	Type	Location	Country
14 Mar 2022	18 Mar 2022	PA	Singapore	Singapore
14 Mar 2022	18 Mar 2022	SL	Singapore	Singapore
21 Mar 2022	22 Mar 2022	VCA SiS	Singapore	Singapore
12 Apr 2022	13 Apr 2022	SL	Miri, Malaysia	Malaysia
11 Jul 2022	15 Jul 2022	CO	Houston	USA
11 Jul 2022	15 Jul 2022	PA	Houston	USA
18 Jul 2022	22 Jul 2022	HO	Houston	USA
09 Aug 2022	10 Aug 2022	VCA SiS	Tampa	USA
15 Aug 2022	15 Aug 2022	VCA ISM	San Francisco	USA
14 Nov 2022	15 Nov 2022	VCA NC	Imabari	Japan

BV

First Date	Last Date	Type	Location	Country
21 Mar 2022	22 Mar 2022	SL	Port Harcourt	Nigeria
5 May 2022	6 May 2022	CO	Piraeus	Greece
17 May 2022	18 May 2022	SL	Taiwan	China
4 Jul 2022	5 Jul 2022	VCA SiS	Singapore	Singapore
26 Sep 2022	30 Sep 2022	HO	Paris	France
27 Oct 2022	28 Oct 2022	VCA NC	St. Nazaire	France
23 Nov 2022	24 Nov 2022	VCA SiS	Yeosu	Korea

CCS

First Date	Last Date	Type	Location	Country
20 Jun 2022	24 Jun 2022	PA	Shanghai	China
11 Jul 2022	15 Jul 2022	HO	Beijing	China
30 Aug 2022	31 Aug 2022	VCA SiS	Singapore	Singapore
14 Sep 2022	15 Sep 2022	VCA MC	Stuttgart	Germany
27 Sep 2022	29 Sep 2022	CO	Hainan	China
10 Oct 2022	12 Oct 2022	CO	Hong Kong,	China
2 Nov 2022	3 Nov 2022	SL	Singapore	Singapore

CRS

First Date	Last Date	Type	Location	Country
9 Feb 2022	10 Feb 2022	VCA SiS	Yalova	Turkey
1 Mar 2022	4 Mar 2022	VCA ISM	Zadar	Croatia
1 Mar 2022	4 Mar 2022	SL	Zadar	Croatia
22 May 2022	27 May 2022	HO	Split	Croatia

DNV

First Date	Last Date	Type	Location	Country
9 Feb 2022	10 Feb 2022	SL	Alexadria	Egypt
28 Feb 2022	1 Mar 2022	SL	Aberdeen	UK
13 Jun 2022	14 Jun 2022	VCA NC	Flensburg	Germany
15 Jun 2022	16 Jun 2022	CO	Hamburg	Germany
24 Jul 2022	25 Jul 2022	VCA SiS	Valley Field	Canada
27 Jul 2022	28 Jul 2022	SL	St. John, Canada	Canada
30 Aug 2022	31 Aug 2022	VCA SiS	Bremerhaven	Germany
17 Oct 2022	21 Oct 2022	HO	Hovik	Norway
23 Nov 2022	25 Nov 2002	PA	Shanghai	China

IRS

First Date	Last Date	Type	Location	Country
18 Apr 2022	22 Apr 2022	HO	Mumbai	India
12 May 2022	13 May 2022	SL	Port Blair	India
5 Sep 2022	7 Sep 2022	VCA SiS	Chennai	India

KR

First Date	Last Date	Type	Location	Country
25 Apr 2022	27 Apr 2022	SL	Guangzhou	China
30 May 2022	31 May 2022	VCA MC	London	UK
13 Jun 2022	15 Jun 2022	PA	Shanghai	China
10 Oct 2022	11 Oct 2022	VCA SiS	Singapore	Singapore
17 Oct 2022	18 Oct 2022	VCA NC	Mokpo	Korea
20 Oct 2022	21 Oct 2022	VCA SiS	Yeosu-Gwangwamg	Korea
24 Oct 2022	28 Oct 2022	HO	Busan	Korea

LR

First Date	Last Date	Type	Location	Country
7 Feb 2022	8 Feb 2022	SL	Lagos	Nigeria
10 Mar 2022	11 Mar 2022	VCA NC	Helsinki	Finland
21 Mar 2022	22 Mar 2022	SL	Singapore	Singapore
23 Mar 2022	25 Mar 2022	CO	Singapore	Singapore
18 Apr 2022	19 Apr 2022	SL	Dalian	China
6 Jun 2022	10 Jun 2022	HO	Southampton	UK
9 Oct 2022	10 Oct 2022	VCA SiS	Doha	Qatar
5 Oct 2022	7 Oct 2022	VCA SiS	Singapore	Singapore
7 Nov 2022	8 Nov 2022	PA	Southampton	UK

NK

First Date	Last Date	Type	Location	Country
10 May 2022	11 May 2022	SL	Lisbon	Portugal
12 May 2022	13 May 2022	VCA SiS	Lisbon	Portugal
7 Jun 2022	8 Jun 2022	VCA NC	Ho Chi Min City	Vietnam
9 Jun 2022	10 Jun 2022	SL	Ho Chi Min City	Vietnam
27 - June	1 Jul 2022	HO	Tokyo	Japan
11 Jul 2022	12 Jul 2022	VCA SiS	Manila	Philippines
14 Jul 2022	15 Jul 2022	VCA NC	Cebu	Philippines

PRS

First Date	Last Date	Type	Location	Country
13 Jan 2022	14 Jan 2022	SL	Swinoujscie	Poland
17 Jan 2022	21 Jan 2022	HO	Gdansk	Poland
25 Mar 2022	25 Mar 2022	VCA MC	Gdansk	Poland
23 Mar 2022	24 Mar 2022	VCA NC	Gdansk	Poland

RINA

First Date	Last Date	Type	Location	Country
20 Jun 2022	23 Jun 2022	SL	Hamburg	Germany
20 Jun 2022	23 Jun 2022	PA	Hamburg	Germany
20 Jun 2022	23 Jun 2022	VCA SiS	Hamburg	Germany
6 Sep 2022	7 Sep 2022	VCA ISM	Piraeus	Greece
19 Jul 2022	20 Jul 2022	VCA MC	Singapore	Singapore
14 Nov 2022	18 Nov 2022	HO	Genoa	Italy

TL

First Date	Last Date	Type	Location	Country
17 Jan 2022	21 Jan 2022	VCA NC	Istanbul	Turkey
7 Feb 2022	9 Feb 2022	VCA NC	Istanbul	Turkey
10 Feb 2022	11 Feb 2022	VCA ISM	Istanbul	Turkey
7.Mar.22	11.Mar.22	VCA SiS	Istanbul	Turkey
10.Mar.22	11.Mar.22	VCA MC	Istanbul	Turkey
11 Apr 2022 16 May 2022	15 Apr 2022 18 May 2022	HO (Part I) HO (Part II)	Istanbul	Turkey
25 Apr 2022	26 Apr 2022	VCA ISM	Turkey	Turkey
28 Apr 2022	29 Apr 2022	VCA MC	Turkey	Turkey
19.May.22	20.May.22	VCA SiS	Istanbul	Turkey
30.May.22	31.May.22	SL	Istanbul	Turkey
1 Jun 2022	2 Jun 2022	VCA SiS	Istanbul	Turkey
16 Aug 2022	16 Aug 2022	SL	Izmir	Turkey
2 Sep 2022	9 Sep 2022	VCA SiS	Sanko Port-Adana	Turkey
01 Nov 2022	5 Nov 2022	VCA SiS	Istanbul	Turkey
8 Dec 2022	10 Dec 2022	VCA SiS	Nemrut Port-Aliaga	Turkey
12 Dec 2022	15 Dec 2022	VCA SiS	Istanbul	Turkey

V
Assessment Results

The QACE Assessors are strategically located to deliver the Assessment Programme in the most cost-effective manner possible.

The review of the assessments completed in 2022 shows:

▪ The ROs' processes of the management of technical knowledge, document retrieval, product certification, and supplier services are particularly well managed.

▪ The ROs' processes of training and staff authorisation, root cause analysis, report verification, survey oversight, safety training, ISM auditing and internal audits have scope for improvement.

▪ The ACBs' processes of audit planning, execution and competence management are well managed; and

▪ The ACBs' depth of auditing of management functions,

▪ QACE CRs and IRs, audit planning and sampling have scope for improvement.

VI
Recommendations

Collective Recommendations

QACE has issued Collective Recommendations (CRs) each year since 2012, to all the ROs, ACBs and Assessors.

The CRs are developed on the basis of an analysis of all the audit findings of the previous year. The recommendations have been effective in bringing a focus to issues highlighted by QACE Assessments over the years.

For 2022, two CRs were made:

CR#1 related to the review of the training systems to improve their understanding and implementation thereof;

The ROs confirmed in their responses to CR#1 that they have reviewed their processes and implemented corrective actions, as necessary.

CR#2 related to review of the procedures and guidelines for remote surveys.

Our assessments of the few remote surveys assessments held, show that the management of remote surveys has improved.

Collective Recommendations of 2023

Based on our analysis of all the findings of all the ROs in 2022, the following

Collective Recommendations are made:

CR2023 #1: All ROs to review their training systems, particularly in the light of the 2022 audit findings, to ensure improved understanding and implementation of their documented requirements (processes, procedures, checklists, guidelines) by their technical staff and strengthen the monitoring system to ensure the effectiveness.

CR2023 #2: All ROs to focus on improving their procedures, training, authorisation and monitoring processes for ISM Code Certification and implementation thereof.

The analysis of the 2022 audit findings, forming the basis of the above CRs, is documented in Annex C of this report.

VII
Working with Interested Parties

Report Distribution

In continuation of the decision taken in 2020, printing of hard copies of the Annual Report has been discontinued. The report is distributed to interested parties only electronically, by email. The Annual Report is also published in the QACE website.

The Accredited Certification Bodies (ACBs)

The relationship between ACBs and QACE is satisfactory. The ACB auditors and QACE Assessors work as a team, as envisaged in the Tripartite Agreement and are able to achieve the objectives of both organisations during audits. ACB Lead Auditors use the QACE Collective and Individual Recommendations and the ROs' responses in their auditing. The ROs and the ACBs have supported this use of the IRs and feedback and agree that this practice is beneficial to the ROs.

The International Association of Classification Societies (IACS)

QACE continues to work with IACS to ensure the ACB auditors have a few annual audit focus issues. In late 2022, QACE and IACS developed jointly three Focus Areas for 2023.

QACS and IACS hold two meetings, in the spring and autumn, each year. These meetings facilitate the direct exchange of ideas on common issues such as updates to the IACS QMSR, QACE QIQS and QRs, auditor training, and End-User Workshop arrangements.

Furthermore, QACE also attended, in part, the IACS Quality Committee meetings to work with IACS on the review of the IACS QMSR and other relevant issues of common interest.

QACE also worked with IACS in a small working group to progress the merger of IQARB with QACE.

VIII
Concluding Remarks

The QACE Board of Directors and the Secretariat confirm that the operations have indeed improved the effectiveness in meeting the purpose of QACE as set out in the EU Regulation.

The QACE Board of Directors and the Secretariat continue their commitment to the principles of independence and transparency.

IX
Acknowledgments

QACE acknowledges the importance of the QACE Assessors in delivering the QACE core activity - its assessment programme. Without their expertise, professionalism and commitment, it would be impossible to deliver on the QACE objectives and the expectations of the interested parties.

QACE thanks the Accredited Certification Bodies and their auditors, for their positive implementation of the Tripartite Agreement and incorporation of QACE requirements and Assessors into the audit process. Their efforts have resulted in a team philosophy, which helps all participants to achieve their objectives through a single auditing scheme.

QACE thanks the ROs for the support extended by them to the QACE Assessors in fulfilling their assessments. QACE acknowledges the valuable feedback the ROs and ACBs provided on various occasions, throughout the year.

QACE appreciates the valuable assistance of its President, Mr Lukasz Korzeniewicz, for his ongoing commitment to QACE.

QACE acknowledges with thanks the support of the European Commission and the EMSA, through their valuable support to QACE.

QACE thanks the IACS Secretariat and the IACS Quality Committee for their cooperation with QACE in jointly developing the Focus Areas.

Glossary

ABS .... American Bureau of Shipping

ACB... Accredited Certification Body

AGM .... Annual General Meeting

BSI .... The British Standards Institution *[Certification Body]*

BV ....Bureau Veritas S.A.

CCJ ....Quality Certification Center *[Certification Body]*

CCS .... China Classification Society

CIC .... Community Interest Company *[Non-Profit]*

CO .... RO Controlling Office

CRs .... Collective Recommendations

CRS .... Croatian Register of Shipping

DEKRA ....DEKRA Certification GmbH *[Certification Body]*

DNV ....DNV AS

EC ....European Commission

EMSA ....European Maritime Safety Agency

EU .... European Union

EUW ....IACS ACB Auditor End User Workshop

HO .... RO Head Office

IACS .... International Association of Classification Societies

IACS PR .... IACS Procedural Requirements

IACS UR... IACS Unified Requirements

IAF .... International Accreditation Forum, Inc.

IMO ....International Maritime Organisation

IRS ....Indian Register of Shipping

IRs... Individual Recommendation

ISM .... International Safety Management Code

ISO .... International Organisation for Standardization

KR .... Korean Register of Shipping

LR .... Lloyd's Register

NC .... Audit finding graded as Nonconformity

NGO .... IMO Non-Governmental Organisation

NK... Nippon Kaiji Kyokai

OB .... Audit finding graded as Observation

PA.. RO Plan Approval Centre

PRS .... Polish Register of Shipping S.A.

QMS .... Quality Management System

QRNs .... QACE Requirements Notices

QSCS.......................... IACS Quality System Certification Scheme

RINA .... RINA Services S.p.A.

RO .... Recognised Organisation

RS .... Russian Maritime Register of Shipping

SGS .... SGS S.A. *[Certification Body]*

SL... RO Survey Location

SO.. Scheme Owner

TL.. Türk Loydu

VCA... Vertical Contract Audit

Annex A

Elected Non-Executive Directors of the Board for QACE

Ashok Mahapatra (Chair) ....India
Hui XIE .... China
Nikos MIKELIS.. UK
Peter Hinchliffe .... UK
Niels Bjørn MORTENSEN ....Denmark

Secretariat

Nikos MIKELIS..Company Secretary

Anantha PADMANABHAN .... Executive Secretary

Matina BINIAKOU .... Administration Manager

Sub-contracted Assessors

Tim HO ....Far East

Hartmut NICKEL .... Europe

Priyabratha PATNAIK .... USA

Gur SARUP ....South Asia

Abhay SHAH ....Southeast Asia

Alvin SHEPHERD .... America

Varadaraj GANAPATHY ....UK

Annex B

Members of QACE –

EU Recognised Organisations

American Bureau of Shipping
Bureau Veritas SA
China Classification Society
Croatian Register of Shipping
DNV AS
Indian Register of Shipping
Korean Register of Shipping
Lloyd's Register
Nippon Kaiji Kyokai

Polish Register of Shipping S.A.

RINA Services S.p.A.

Russian Maritime Register of Shipping (only till 7th October 2022)

Elected President
Łukasz Korzeniewicz, Polish Register of Shipping

The QACE Members' Certificates of Compliance can be found on the QACE website www.qace.co

Approved Accredited Certification Bodies

BSI	Milton Keynes, U.K.
CCJ	Warsaw, Poland
DEKRA Certification B.V.	Arnhem, The Netherlands
SGS S.A.	Geneva, Switzerland

Annex C

2023 Collective Recommendations

2022 Audits resulted in a total of 658 findings – 243 nonconformities and 415 observations – for all ROs. The trend in the number of findings has remained rather flat over the years: 2018: 632; 2019: 600; 2020: 525 (Covid year); 2021: 601; 2022: 658.

The 2023 audit findings were analysed quantitatively and qualitatively, to identify Collective Recommendation(s) for 2023.

The quantitative analysis shows the following:

(Note: The percentages in the following will add up to more than 100% because many findings fall under more than one category)

- Control of production and Service Provision (QMSR Clause 8.5.1 & RO Code Clause 5.2.5, 5.7) has contributed to 357 (54.3%) of the 658 findings:

   o 138 (38.7%) of the 357 findings under this category are consequent to errors in 'job execution' – inadequate implementation of requirements, non-compliance with own procedures;

   o 135 (37.8%) of 357 are from VCAs;

   o 56 (15.7%) of 357 are from ISM audits.

- Survey during service (IACS Category 9) has contributed to 306 (46.5%) of the 658 findings:

  - 122 (39.9%) are from Ships in Service VCAs;

  - 98 (32%) are from Survey ocations;

  - 74 (24.2%) are from Head Offices.

- VCAs have contributed to 231 (35.1%) of the 658 findings;

  - 130 (56.3%) of these 231 are from 'Ships in Service';

  - 50 (21.6%) of these 231 are from 'New Construction';

  - 30 (13%) of these 231 are from ISM audits.

- ISM Audits (IACS Category 10) has contributed to (11.6%) of the 658 findings:

  - 54 (71.1%) of these 76 are from survey locations and VCAs.

This is supported by the fact that PR9 Procedural Requirements for ISM Code Certification has attracted the highest number of findings – 44 – amongst PRs.

A qualitative analysis of the findings shows the proximate causes for the above findings to be:

- Inadequate implementation, in 287 (43.6%) of the 658 findings;

- Incomplete reporting / records in 216 (32.8%) of the 573 findings;

- Inadequate understanding and implementation of the ISM Code requirements.

It is interesting to note that there is no significant change in the distribution of the audit findings compared to that in 2021.

The root causes for these findings, prima facie, seem to be, one or more of the following;

Inadequate training of the technical personnel in the RO procedures, chec lists, forms and guidelines and implementation thereof, particularly in ISM Certification;

Inadequate procedures, or implementation thereof, of the qualification and authorisation procedures; Inadequate monitoring of jobs carried out and of the reports/ documents (e.g., drawings and certificates).

This list is not exhaustive and there could be other root cause(s) which could vary between the ROs. It is expected that they would analyse their own performance to arrive at the causes applicable to their systems. This identification of the correct root cause(s) will lead to the identification and implementation of appropriate corrective action(s).

Considering that focus on training was a CR in 2022, in spite of which the trend of findings remains nearly the same, it seems necessary to continue the focus on training in 2023 too. This should be supported by a review and strengthening of the qualification and authorisation processes. Training, authorisation and maintenance of qualification is already identified as a focus area, jointly by QAC & IACS, for 2023.

Considering the above the collective recommendations for 2023 are:

CR2023 #1: All ROs to review their training systems, particularly in the light of the 2022 audit findings, to ensure improved understanding and implementation of their documented requirements (processes, procedures, checklists, guidelines) by their technical staff.

CR2023 #2: All ROs to focus on improving their procedures, training, authorisation, and monitoring processes for ISM Code Certification and implementation thereof.