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IMO MEMBER STATE AUDIT SCHEME

Consideration of a remote audit mechanism

Note by the Secretary-General

SUMMARY

Executive summary: This document contains the outcome of the detailed consideration of a remote audit mechanism, based on initial discussion of its possible use by C/ES.32 and further consultation with auditors under the Scheme. The proposed mechanism could be used under the current Framework and Procedures for the IMO Member State Audit Scheme (resolution A.1067(28)) in order to overcome the impact of the disruption caused by the COVID-19 pandemic on the audit schedule.

Strategic Direction, if applicable: 1

Output: 1.4

Action to be taken: Paragraph 44

Related documents: C/ES.32/7/4, C/ES.32/5/1, C/ES.32/Communication/18, C/ES.32/D, Circular Letter No.3425 and resolutions A.1067(28) and A.1070(28)

1 Background

1 The Council, at its thirty-second extraordinary session held from 4 May to 3 August 2020, had preliminary discussion on the possible use of remote audits as a mechanism to overcome the impact of the disruption caused by the COVID-19 pandemic and to prevent further postponements of the audit schedule due to unavailability of international travel.

2 Whilst considering a preliminary invitation to discuss remote audit procedures aimed at preventing the need for further postponements of the audits due to possible future extraordinary circumstances (C/ES.32/7/4), the Council invited Member States and the Secretary-General (C/ES.32/D, paragraph 7.4) to submit proposals, at an appropriate session of the Council, expressly providing for audits, including follow-up audits and audits in the second audit cycle, to take place remotely, and assessing whether e-meeting capabilities could be used for that purpose, where possible (C/ES.32/5/1 and C/ES.32/Communication/18).

3 The disruption caused by the pandemic is still causing delays and postponements in the implementation of audits under the Scheme and the uncertainties still prevail. As a consequence, the remote audit mechanism has been explored as a way to reduce the negative impact of the pandemic on the continuation of the audit schedule and the outcome of the detailed consideration of its various elements is presented in this document.

2 Rationale for remote audit mechanism

4 The use of a possible remote audit mechanism aimed at preventing the need for further postponements of audits, in line with the decisions of C/ES.32, was discussed on 10 September 2020, in a virtual meeting of auditors currently on the roster of auditors under the Scheme. At the meeting attended by 98 auditors from 50 Member States, views were shared on the feasibility of a remote audit mechanism, as part of the audit process, including on various principal and practical issues to be further elaborated, in order to ensure that audit objectives are fulfilled in an effective way. Based on this exchange of views, a rationale for the conduct of remote audits has been developed, as set out in annex 1.

5 The elements considered in the rationale include:

- .1 existing practices in various auditing systems;
- .2 definition of remote audit;
- .3 benefits and barriers for remote auditing;
- .4 possible ways of addressing the barriers for remote auditing;
- .5 additional process steps and tools that emerged as essential to incorporate remote methodology into auditing process under IMSAS; and
- .6 considerations related to audit teams.

6 The analysis of the views expressed by the auditors, as summarized in annex 1, has shown that, despite certain concerns and obstacles that had to be addressed, the use of the remote audit mechanism could provide a way forward for those scheduled audits where capabilities exist in the Member States and where audit objectives can be achieved.

7 Some of the main conclusions from the rationale are:

- .1 remote audit, using available technology for virtual meetings, is the most realistic option for ensuring the required level of verification when a "face-to-face" audit is not possible;
- .2 remote mode of auditing is identified as one of the audit methods described in ISO 19011:2018 standard, and has been recognized in certification activities since 2011 (ISO 19011:2011 Annex B1);
- .3 remote audits (partially remote or full remote) are conducted using the same audit process as for on-site audits, but using electronic means to remotely obtain audit evidence and to evaluate it objectively, in order to determine the extent of conformity to the audit standard;

- .4 remote audit can be a more efficient and productive method of auditing, not only from the point of view of the audited Member State, but to the audit team as well. Although it takes more time to prepare and to conduct a remote audit, in most cases, the significant reduction in travel time makes the process more efficient and productive;
- .5 some barriers for the effective use of remote audits have been identified at the level of both the programme and individual Member States. Whilst the solutions for the barriers at the programme level can be proposed and devised (some of which have been dealt with in this document), it will be up to each Member State to accept remote methodology in the context of its own circumstances and preferences. In any way, all barriers should be addressed before a decision can be made to proceed with a remote audit for each Member State;
- .6 as remote audits are conducted, using information and communication technology (ICT), essential prerequisites for conducting a remote audit are:
 - .1 availability and continuity of the required technology;
 - .2 availability of resources; and
 - .3 competent auditors and auditees in the use of the technology involved. Additional guidelines for Member States and auditors have been envisaged;
- .7 ICT technology in the conduct of virtual meetings is already widely used, and electronic means have also been in use in audits under the Scheme, including emails and online links for providing various documents and records during audits. Regarding the security of information itself, it is an inherent feature of the common platforms in use (such as Microsoft Teams, predominantly in use for smaller virtual meetings, or email servers). Each Member State, however, would need to satisfy itself with the security of the technology before proceeding with a remote audit;
- .8 additional process steps and additional tools in planning and preparation for a remote audit would be necessary (see paragraphs 20 to 33);
- .9 the use of a remote audit mechanism will enable the Organization to engage more auditors, including new auditors, as there will be no travel cost involved to the Organization and the Member States.

8 At this stage of the development of the Scheme where, for some Member States, baseline data are yet to be established, political engagement and positive impact of on-site audits in sensitizing the government structures, as well as the maritime industry at large, are still considered important and necessary.

3 Feedback from Member States on their capability and willingness to accept remote audits

9 The Secretariat communicated with all 25 Member States scheduled to be audited in 2021, in order to gather direct feedback with regard to their capabilities and willingness to engage in remote audits, including the availability of required technology, as well as the feasibility to fulfil all audit objectives remotely. The requested feedback has been received from 20 Member States and a summary of the responses received is set out in annex 2.

10 The feedback received shows that 19 Member States are capable and willing to engage in remote audits, although 4 of them preferred the conduct of an on-site audit. It follows that 15 Member States currently scheduled to be audited in 2021 provided a positive feedback for proceeding with a remote audit.

11 Some of those Member States, which provided positive feedback, had concerns, mainly related to:

- .1 compatibility issues in relation to ICT arrangements used by various entities in Member States;
- .2 access to records and confidential documents only available through authorized personnel or via a secure e-mail;
- .3 legislation and documents available only in the national language, therefore, the use of interpreters would be necessary (also the case with on-site audits);
- .4 access to certain activities not possible through video; and
- .5 a preference by several Member States for a remote audit to be followed by an on-site audit, which could be conducted by a limited number of auditors (at least one).

12 The nature of the comments and concerns reported is related to specific issues, which might not prevent most of the audits to proceed using a remote methodology. The existence of such concerns has been considered and addressed in the elaboration of the procedural elements for the remote audit mechanism, as discussed in section 5.

4 Introduction of remote audit mechanism under the existing Framework and Procedures

13 Since the existing *Framework and Procedures for the IMO Member State Audit Scheme* (resolution A.1067(28)) does not specifically prescribe on-site audits as the only mode, it does not prohibit the use of remote audits. For the implementation of remote audits, it is envisaged that the audit process, as stipulated in the Procedures - including preparation, auditing and reporting from audits - would continue to follow the existing Procedures, with the only difference being that the process would be applied through a remote methodology. Therefore, it is the considered view that a decision of the Council on the use of a remote audit mechanism under the existing Framework and Procedures would constitute a sufficient vehicle to commence remote audits.

5 Procedural considerations for implementation of remote audits

5.1 Types of the audit – remote and hybrid audits

14 Based on the initial considerations, as well as the feedback received from Member States, it transpires that remote audits could commence before the conditions for reopening international travel are met. The final modality for the conduct of an audit would then depend on the feasibility to finalize the audit remotely through a full remote audit or a hybrid audit (i.e. partial remote audit, followed by an on-site audit to verify those areas which could not be covered through remote auditing).

Remote audit

15 Some areas of the audit could be conducted remotely, since documents and other supporting information for verification of compliance would have been submitted before the audit. These include:

- .1 organizational set-up of the maritime administration;
- .2 overall strategy for the implementation and enforcement of the mandatory IMO instruments;
- .3 legislative process followed under the Member State's legal system; and
- .4 policies for the implementation of applicable requirements in the flag, coastal, and port State areas of activities.

16 Compared to a typical audit timetable for an on-site audit, the aforementioned audit areas already cover about half of the audit process. In order to establish which additional areas could be audited remotely, feedback on the capability of individual Member State for remote audit, their specific circumstances, concerns and their willingness to engage in such audit would need to be taken into account.

17 In terms of feasibility to meet the audit objectives through remote audit with regard to other potential areas of activities (e.g. specific implementation and enforcement requirements for flag, coastal, and port State activities), it should be understood that this part of auditing normally takes place through interviews of various levels of staff (from management to operational and support level). Conclusions on compliance with the audit standard and the applicable IMO instruments are made based on interviews and sampling of records in real time. This is envisaged to be the most difficult part of the audit objectives to be met through remote auditing.

18 In order to overcome this obstacle and in areas other than those mentioned in paragraph 15, the remote audit would require additional information to be provided to auditors in their preparation for the audit, so that they can build a clear picture on how the processes in the audited Member State are conducted. Based on such an understanding, the audit team would be able to guide the Member State in the preparation of adequate documents and records to be made readily available for sampling during remote audit sessions. This would not constitute a new request since, in accordance with the Procedures, requests for various additional information and documents are normally exchanged between the audit team leader (ATL) and the single point of contact (SPC), in preparation for the audit. Considering that such a process would further delay a possible start of remote auditing, a set of structured "additional pre-audit information" should be completed by each Member State and provided together with the pre-audit questionnaire (PAQ) (which can also be updated, as necessary). The details of the "additional pre-audit information" are discussed separately in paragraphs 20 to 22.

Hybrid audit

19 Based on the feedback from the Member State or during the preparation and conduct of a remote audit, areas requiring a physical visit in order to reach conclusions on the compliance with the requirements of the applicable IMO instruments, would be considered for an on-site part of the audit. This additional audit would result in the entire audit being labelled as a "Hybrid Audit" of a Member State. A proposed process on how to reach that decision is presented in the ensuing paragraphs.

5.2 Additional tools to facilitate the conduct of remote audit

Additional pre-audit information

20 For the reasons stated in paragraphs 16 to 18, a structured set of additional information is proposed to be introduced for each Member State to complete and to provide before the audit, in addition to the PAQ. The proposed structure and content of the additional pre-audit information are set out in annex 3.

21 In the development of the proposed additional pre-audit information, several considerations were taken into account, including:

- .1 ensuring that the type of the additional information requested clarifies and supplements, but does not duplicate, the questions already included in the PAQ. In that respect, the structure of the PAQ has been closely followed;
- .2 being mindful of the burden it presents to a Member State, a minimum set of 71 questions has been proposed; and
- .3 feedback from ATLS' mission reports has been taken into account, recommending the development of additional guidance for Member States in completing PAQ, due to insufficient information being provided in a number of cases.

22 The resulting set of questions contain requests for the minimum required information for the audit team to understand the organizational aspects, how processes are conducted, and how responsibilities are assigned. It is proposed that the additional pre-audit information, as set out in annex 3, be kept as a live document and updates be inserted, based on the experience gained in the conduct of remote audits.

Draft model remote audit timetable

23 Considering that there would be limited hours available daily for remote auditing, the overall duration of a remote audit could be considerably longer. Based on the assumption that an average of four and half hours of auditing could be planned per day, the duration of the audit should be from eight to 10 auditing days, compared to five auditing days for a typical on-site audit. This duration of remote audit could be shortened in cases where specific areas are identified for on-site audit. This means that ample time would need to be allowed, within a range of two weeks, for each remote audit to take place.

24 One of the main documents developed by audit teams before the audit, based on PAQ, is the draft audit timetable, which ensures that all planned audit activities are shared with all parties involved to ensure a smooth conduct of the audit. The current model audit timetable is included in annex 1 of the Auditor's Manual (Circular Letter No.3425).

25 In order to assist the audit teams and Member States in preparing an effective flow of remote audit activities, an updated model is necessary. A draft model remote audit timetable was prepared, as set out in annex 4, based on the following main assumptions:

- .1 the duration of auditing in each day should not exceed five hours. This auditing time would be split between morning and afternoon sessions, with a long mid-day break to facilitate any required provision of additional information and records from the Member State, as well as to accommodate the necessary debriefing of the audit team;

- .2 remote audit activities would be organized in modules, covering all applicable areas of activities for a Member State – i.e. common areas, flag, coastal and port State activities; and
- .3 a draft interim report would be prepared within two days. The draft interim report is normally prepared over the weekend by the audit team and tabled during the closing meeting. To keep this important element of written feedback presented to the audited Member State during the closing meeting, adequate time needs to be planned during each working day.

26 The proposed draft model remote audit timetable could be adapted to the scope of activities of each Member State, thus resulting in shorter or longer sessions within each day, as well as fewer or more auditing days, as necessary, to cover all of the activities.

5.3 Procedural elements

27 In order to comply with the principles of the Scheme, which require a universal approach in auditing, it would be necessary for the remote audit methodology to be made available to all Member States currently on the audit schedule. In that respect, the following steps are envisaged as necessary to reach the decision on the feasibility to conduct a remote audit for each Member State:

- .1 the initial assumption that a remote audit is available would be the same for all Member States. Whether it is used or not would depend on further assessments and preferences by the Member State itself, as listed below;
- .2 based on the analysis of feedback from each Member State, any areas that would require an on-site part of the audit would be identified. A limited on-site audit, focused on those specific areas for which audit objectives could not be met remotely, would be planned (e.g. relevant information on port reception facilities, where many entities interact in the field, may prove to be difficult to capture remotely);
- .3 based on the analysis of PAQ and a completed set of additional pre-audit information, any additional areas that would require an on-site part of the audit would be identified and the audit timetable would be prepared accordingly – i.e. for full remote or hybrid audits;
- .4 during the remote audit, there may be areas identified where full verification could not be achieved remotely. Such areas would be added to the list for the on-site part of the audit; and
- .5 only upon finalization of the remote audit, a final assessment could be made by the audit team on the completion of audit objectives. If areas remain for which additional on-site verification would be necessary, the on-site part of the audit would need to be planned and conducted when the circumstances allow.

Preparation for the remote audit

28 Information provided by the Member State before the audit (paragraphs 27.2 and 27.3) can provide the necessary basis for the audit team to determine the extent to which a remote audit can be planned initially, and also for which audit areas an on-site part of the audit should be planned. Based on these considerations, a draft remote audit timetable would need to be prepared by the audit team, as a basis for further consultation with the Member State.

29 A considerable part of the audit activities could be covered remotely for most of the audits, as stated in paragraph 15. Activities, for which it can be established upfront that implementation of the mandatory requirements could not be adequately assessed remotely, should be indicated for an on-site audit in the audit timetable.

30 Even in those cases where conditions could be met to plan a full remote audit, it would only become clear, after completing the remote audit phase, whether the audit has been successfully completed remotely, or whether some areas should be planned for an on-site audit (see paragraphs 27.4 and 27.5). Therefore, the allowance should be made to proceed with planning of the remote audit, to the extent possible, while leaving necessary flexibility for the audit team to evaluate whether the scope and objectives of the audit were achieved through the remote audit and to decide on any remaining scope for an on-site audit, as necessary.

31 In determining the composition of an audit team for a remote audit, and due to the fact that there would be no travel cost attached, the audit team could be expanded with additional auditor(s) included in the team, wherever possible. Such inclusion of predominantly new auditors could be an efficient and effective way of enhancing their skills and competence. Additional guidance would be provided to the auditors, in accordance with the stipulations made in the rationale for the remote audit (annex 1) and in order to facilitate effective preparation and conduct of remote audit.

32 Due to the use of remote methodology, additional wording would need to be inserted in any new Memorandum of Cooperation (MoC) sent to the Member States in preparation for the audit. For those Member States that have already signed their MoCs, and in order to save time, it is proposed that audits could proceed on the implied assurance that the Member States have agreed that the signed MoCs are valid/read for use through the remote methodology.

Preparation for the on-site audit

33 Upon completion of the remote audit phase and based on the results and conclusions reached by the audit team, further detailed planning for the on-site audit of any remaining audit areas would need to be developed in consultation between the SPC and ATL, including administrative and travel arrangements as per the regular practice in audits. Regarding the timelines, planning for an on-site part of the audit could be done on a case-by-case basis and, inter alia, the following elements would need to be considered:

- .1 number and profile of auditors needed for the remaining verifications and their abilities to visit the Member State due to travel restrictions. The guiding principle could be that the on-site part of the audit could proceed if, at least, one experienced audit team member would be able to visit the country;
- .2 arrangements for communication among the audit team members for necessary briefings during the on-site audit;
- .3 completion of the draft audit interim report after the on-site part of the audit, based on the initial draft prepared after the remote audit; and
- .4 final closing meeting.

6 Possible impact of the use of remote audit mechanism on audit planning for 2021 and beyond

34 Under the current prevailing circumstances and uncertainties as to whether it will become possible to conduct on-site audits in the second half of 2021, it is likely that very few audits, if any at all, could be carried out, unless the option of a remote audit becomes available.

35 If the Council considers favourably the introduction of the remote audit mechanism, based on the elements presented in this document, the detailed planning and preparation for remote audits of those Member States which are capable and willing to engage in remote audits, could commence immediately. However, due to the time necessary for Member States to provide all relevant documents, for auditors to review them, and for taking necessary decisions and making necessary arrangements, remote audits would only be able to commence after the end of August 2021.

36 Considering the timeframe for the provision and review of required documentation, and consultations to develop the remote audit timetable, as well as the heavy agenda of IMO meetings in the second half of 2021, an initial review shows that a maximum of 10 remote audits could be scheduled in the second half of 2021 (from September to November).

37 Based on the foregoing, it should be emphasized that a certain flexibility in the audit schedule should be accepted going forward, bearing in mind that 10 Member States, that were not audited under the voluntary Scheme, are on the immediate audit schedule. Recognizing that some Member States may not be keen to accept remote audits, the audit schedule would need to be dynamic and flexible in some sense to accommodate those Member States that are ready and willing to be audited. The audit schedule may also need to remain dynamic for some time, until it settles back into a structured schedule during or after 2022.

38 An indicative schedule of remote audits for the second half of 2021 and into 2022 was developed, taking into account the feedback from 19 out of 20 Member States that have the required capabilities and are willing to undergo a remote audit, as set out in annex 5. Some of those 19 Member States, however, indicated various concerns or preference for on-site audit, and 12 of them provided a clear positive feedback. These Member States could be approached initially to confirm their period for a remote audit, which would also be contingent on providing the required pre-audit information as a basis for proceeding with a remote audit (i.e. PAQ and additional pre-audit information).

39 Any required on-site part of the audits indicated in annex 5 would need to be planned in collaboration with the audited Member States once the circumstances for their conduct become clearer.

40 With regard to the request of C/ES.32 to expressly provide for audits, including follow-up audits and audits in the second audit cycle, to take place remotely, an incremental approach could be taken so that, only once some experience has been gained in the use of remote audit mechanism, an informed decision on its use in follow-up audits and audits in the second audit cycle could be made.

7 Conclusion

41 Based on the engagement with the auditors under the Scheme (rationale for remote audit mechanism set out in annex 1) and Member States on the audit schedule for 2021 (summary of feedback set out in annex 2), the analysis and considerations presented in this document lay out a possible way forward for the audit schedule to resume, using remote audit methodology, based on the current Framework and Procedures (paragraph 13 and section 5), taking into account the recommendations related to MoCs (paragraph 32).

42 The use of the proposed remote audit mechanism would require certain adjustments in the steps of the audit process and the information exchanged between Member States and audit teams, in order to ensure effectiveness of the process and to maximize the achievement of audit objectives. The following new elements are proposed in that respect:

- .1 additional pre-audit information to be provided by Member States to facilitate the preparation of the audit team, and provision of specific guidance to Member States in the preparation for the audit are considered as essential (paragraphs 20 to 22 and annex 3); and
- .2 a draft model remote audit timetable has been prepared to assist Member States and audit teams in preparing an effective flow of remote audit activities (paragraphs 23 to 26 and annex 4).

43 Taking into account the feedback received from Member States, in relation to their capabilities and willingness to engage in remote audits, as well as the question of availability of resources, an indicative schedule of remote audits is set out in annex 5.

8 Actions requested of the Council

44 The Council is invited to consider the information and proposals provided in this document and, in particular, to:

- .1 endorse the use of remote audit mechanism for audits conducted according to the existing *Framework and Procedures for the IMO Member State Audit Scheme* (resolution A.1067(28)) (paragraph 41 and annexes 1 and 2);
- .2 note the need to adjust the text of the Memorandum of Cooperation (MoC) in cases where it has not been concluded as yet, and for those cases where signed MoCs are in place for them to valid/read for use through the remote methodology (paragraph 41);
- .3 endorse the need for additional pre-audit information, while inviting Member States to provide sufficient information before the audit through the forms provided; and requesting the Secretariat to keep such information under review and to adjust it based on experience gained in audits (paragraph 42.1 and annex 3);
- .4 note, in general, the draft model remote audit timetable, which may need to be adjusted on a case-by-case basis, taking into account the scope of maritime activities of the audited Member State (paragraph 42.2 and annex 4); and
- .5 note the potential impact of the introduction of the remote audit mechanism on the audit schedule and, in particular, the indicative audit schedule for the second half of 2021 and early 2022 (paragraph 43 and annex 5).

ANNEX 1

Rationale for developing the remote audit mechanism and its implementation in audits under the IMO Member State Audit Scheme (IMSAS)

1 Introduction

1.1 The Council, at its thirty-second extraordinary session, among others, endorsed the postponement of the IMSAS audits scheduled for 2020 to 2021, due to the impact of the COVID-19 pandemic, and invited Member States and the Secretary-General to submit proposals on a remote audit mechanism aimed at preventing the need for further postponements of the audits due to possible future extraordinary circumstances and to expressly provide for audits, including follow-up audits and audits in the second audit cycle, to take place remotely, including assessing whether e-meeting capabilities could be used for that purpose, where possible (C/ES.32/D, paragraph 7.4).

1.2 As a first step, a virtual meeting was organized with all auditors currently on the roster of auditors under the Scheme, where feasibility and concerns for conducting remote audits were discussed. The virtual meeting was attended by 98 auditors from 50 Member States. The auditors expressed different views as to how and to what extent remote audits can secure the fulfilment of the audit objectives, whilst also accepting that the development and implementation of a remote audit mechanism could be beneficial.

1.3 The current *Framework and Procedures for the IMO Member State Audit Scheme* (resolution A.1067(28)) (hereafter Framework and Procedures) does not prohibit the conduct of audits through a remote audit mechanism, nor does it provide for the conduct of remote audits. Thus, the Council would need to approve the conduct of audits using a remote audit mechanism, to be developed.

2 Options for auditing Member States scheduled in 2021 and beyond

2.1 Remote audit, using available technology for virtual meetings, is the most realistic option for ensuring the required level of verification when "face-to-face" audit is not possible. Although current Procedures (resolution A.1067(28)) do not include an option for remote audits, it should be noted that majority of the steps in the preparation, auditing and reporting from audits would stay the same in this option. The Council, therefore, could grant its approval for using the remote audit mechanism, once developed, during the extraordinary circumstances.

2.2 Alternatively, audits under the scheme could be continued through document-based audit, however, this option does not provide the required level of verification, and document-based audits are not supported under the current Procedures, except for follow-up audits.

3 Definition - what is a remote audit?

3.1 The concept of remote audits is not new; ISO has recognized remote auditing in certification activities since 2011 (ISO 19011:2011 Annex B1). The latest edition (2018) of the standard (ISO 19011 entitled "Guidelines for auditing management systems") continues to recognize remote auditing (Annex A1), and some accredited certification bodies (e.g. BSI) use the guidance provided therein to perform full remote audits for the certification of quality management systems.

3.2 It is worth noting that several Member States, due to travel restrictions caused by the COVID-19 pandemic, have authorized their recognized organizations (ROs) to carry out audits required by the International Safety Management (ISM) Code remotely. ROs are using different remote audit solutions (full remote audits or partial remote audits) depending on the type of the audit and the needs and capabilities of the company and ships concerned.

3.3 Remote audits are conducted using the same audit process as for on-site audits, but electronic means are used to remotely obtain audit evidence and evaluate its objectively in order to determine the extent of conformity to the audit standard. In accordance with ISO 19011:2018 Annex A1, **remote audits** are audits performed using technology to gather information, interview an auditee, etc. when "face-to-face" methods are not possible or desired. Remote audit activities are performed at any place other than the location of the auditee, regardless of the distance.

3.4 Remote audit should not be confused with **virtual audit** which refers to auditing of virtual activities and locations (when an organization performs work or provides a service using an online environment allowing persons irrespective of physical locations to execute processes), as described in ISO 19011:2018 Annex A16.

3.5 In addition to the above, the following terms are used:

- .1 **partial remote audits:** are audits that are conducted through a combination of remote and on-site checks (human interaction on-site, human interaction remote, no human interaction on-site and no human interaction remote); and
- .2 **full remote audits:** are audits that are conducted completely remotely using technology (human interaction remote and no human interaction remote).

4 Benefits and barriers of remote auditing

4.1 As indicated above, remote audits use the same process as on-site audits, where both audit methods can be used separately or in combination to achieve the audit objectives. Each audit method has its strengths and weaknesses. The most evident benefit of using remote audits is the ability to continue the conduct of audits during this extraordinary period, which will avoid further postponement of audits scheduled for 2021 until such time when full international travel can resume.

4.2 Based on the virtual meeting of auditors that took place on 10 September 2020, the following benefits and barriers of remote auditing have been identified:

- .1 Benefits:
 - .1 can be more efficient and productive;
 - .2 avoiding travel to distant or remote locations;
 - .3 ability to audit more locations; and
 - .4 an opportunity to train and mentor new auditors.
- .2 Barriers:
 - .1 lack of technology;
 - .2 trusting technology;
 - .3 trusting the audit;
 - .4 lack of commitment; and
 - .5 insufficient auditor training.

4.3 Remote audit may provide advantages over the traditional method of auditing. It can be a more efficient and productive method of auditing, not only from the point of view of the audited Member State, but to the audit team as well. Although it takes more time to prepare and conduct a remote audit, the significant reduction in travelling time makes the process, in most cases, more efficient, productive, and safe for the location of audit team members and time differences.

4.4 Notwithstanding the above, a remote audit may not produce the full impact as an on-site audit, where political commitment from the government is important to advance and improve the maritime activities of the State. The planned arrival of an audit team into a country is a major tool that supports a large number of maritime administrations to get the necessary support at the highest level of government. This engagement by senior government officials is essential for the long term. It is, therefore, paramount that remote audit should not be used as a cost-saving measure, or because it is less troublesome for the Member State, as compared with an on-site audit in the Member State. Remote audit should be secondary to on-site audit and only when conditions restrict the former occurring, as well as when the audit objectives can be met in full.

5 Addressing the barriers for conducting remote audits

5.1 Remote audits of Member States should be conducted in a way that respects the principles of auditing stipulated in the Framework and Procedures – sovereignty, universality, consistency, fairness, objectivity, timeliness, transparency, disclosure, cooperation and continual improvement. It is, therefore, crucial to address the identified barriers and design the remote audit process in such a way to provide every State with the opportunity of proceeding with its scheduled audit, as long as the conditions that secure the fulfilment of the audit objectives can be met.

Lack of technology

5.2 Remote audits are conducted using information and communication technology (ICT). Thus, an additional step should be introduced to determine the viability of conducting a remote audit. The feasibility of conducting remote audit using ICT should be considered when deciding whether to conduct a remote audit and establishing the audit plan. Among others, the following should be examined:

- .1 Is the appropriate technology (equipment, suitable internet connection and bandwidth) available to share required documentation and connect directly with relevant staff? and
- .2 Can the available technology ensure the confidentiality, security and data protection of all data shared during the audit?

Additionally, a risk assessment should be made to identify areas (people, activities, sites) that cannot be adequately assessed by remote audit alone.

Trusting technology

5.3 The Organization should specify immersive technology solutions to be used during the audits. As a minimum, the immersive technology solutions should include:

- .1 live web streaming technology (such as MS Teams) for document, record and procedure review and live interviews; and

- .2 live streaming paired with mobile technology for virtual site tours to observe the implementation of processes and activities in real-time.

The technology to be used should be proven, widely used and available to all Member States.

Trusting the audit

5.4 Some auditors do not trust the effectiveness of remote audits due to inability to achieve one or more of the following:

- .1 physical access to audit evidence;
- .2 a site walkthrough that can provide key information for the identification of issues;
- .3 access to peripheral information such as non-verbal communication between the auditees to detect possible confusing messages during an interview that is sometimes crucial to detect any inconsistencies or concealed problems;
- .4 informal communication with the auditees that will build up trust and facilitate the audit process; and
- .5 providing audit evidence in real-time.

5.5 Trust in remote audits can be built up by:

- .1 using the appropriate technologies for document, record and procedure review and videoconferencing;
- .2 training the auditors to be able to:
 - .1 work with the immersive technology solutions selected;
 - .2 handle the difficulties associated with picking up on verbal and visual cues when interviewing remotely;
 - .3 develop new ways for selecting samples and following audit trails to ensure that samples are representative, are of their choosing, and that they remain in control of the audit process; and
- .3 suitably combining remote and on-site auditing, taking into consideration the associated risks and opportunities.

Lack of commitment/focus

5.6 During remote audit, auditees and auditors may lose their focus to the audit process due to performing other tasks while the audit is being conducted or due to the time difference between the different auditors and the auditees.

This issue can be addressed through the following measures:

- .1 selecting auditors, for remote audits, which are located in similar time zones;
- .2 strong commitment from the Member States who nominated auditors to give priority to the audit process and make their staff available; and
- .3 for the audited Member State, releasing the auditees from other duties during the remote interviews and allowing some extra time in case of technical difficulties, if possible.

Insufficient auditor training

5.7 Remote audit poses some unique challenges to the auditors. Thus prior to conducting a remote audit, all auditors should be able to:

- .1 work with the immersive technology solutions selected;
- .2 handle the difficulties associated with picking up on verbal and visual cues when interviewing remotely; and
- .3 develop new ways for selecting samples and following audit trails to ensure that samples are representative, are of their choosing, and that they remain in control of the audit process.

6 Additional process steps and tools for conducting remote audits

6.1 As remote audits are conducted using ICT, essential prerequisites for conducting remote audits are:

- .1 availability of the required technology;
- .2 availability of resources; and
- .3 auditors and auditees who are competent with the use of the technology involved.

6.2 Prior to planning a remote audit, the feasibility of conducting a remote audit should be examined. The criteria for determining such should be simple, actionable and transparent. As a minimum, the following should be examined to determine the feasibility of conducting a remote audit:

- .1 stability and quality of online connection;
- .2 confidentiality, security and data protection when exchanging information;
- .3 ability to access relevant documented information, including software, databases, records, and other sources of information/evidence;
- .4 ability to make the authentication/identification of interviewees;
- .5 ability to observe facilities, processes, activities; and
- .6 ability to reach and interview people.

6.3 A guidance document should be prepared to guide and assist each Member State to assess its readiness for remote audit.

6.4 A remote audit can be conducted entirely or partially remote. From the virtual meeting with the auditors, it transpired that the vast majority of auditors are of the view that partial remote audits will be more appropriate due to the complexity of some of the activities to be audited and absence of any assurances at this time that full remote audits can adequately fulfil audit objectives.

6.5 In the case of a partial remote audit, it is critical to identify which processes or activities can be audited remotely, with the available ICT tools and which processes or activities cannot be audited remotely. The decision should be based on the risks that may adversely impact the audit/assessment for the chosen ICT tools. Processes or activities should be audited remotely only when the conditions and arrangements can provide assurances that the relevant audit objectives can be met.

6.6 Based on a preliminary assessment on the difficulty to observe facilities, processes and activities using the available ICT tools, it should be taken into consideration that in a significant number of Member States, some coastal State and port State obligations and responsibilities are assigned to entities that are not the principal entity of the maritime administration, and which may have restrictions imposed on the use of ICT tools. It would, therefore, be necessary to determine which activities would fall under such condition and consequently which auditing method would be applied for them. In making such determination, the following activities should be assessed:

- .1 provision of port reception facilities;
- .2 handling of dangerous goods;
- .3 operational pollution response (port areas);
- .4 SAR coordination centre;
- .5 Aids to Navigation;
- .6 operational pollution response and enforcement (coastal response);
- .7 radiocommunication services and navigational warnings
- .8 hydrographic services; and
- .9 safety of navigation services (VTS).

6.7 It should be noted that the use of partial remote audit mechanism entails limited visit to the Member State would be necessary before the interim audit report can be finalized. It is envisaged that the auditor(s) visiting the Member State will perform the on-site audit of the activities/processes which cannot be audited remotely and obtain any other information or evidence required. Based on the proposal by the audit team leader to the Secretariat, the duration of the limited visit and the number of auditors to visit the Member State will be determined, in consultation with the Member State concerned.

6.8 Like on-site audit, remote audit must be thoroughly planned in advance, and auditors must be fully prepared to achieve the audit objectives. Due to the limitations of ICT and lack of physical presence, a remote audit should be fully choreographed in as much detail as possible from start to finish. In particular, a more structured data set would be necessary from Member States to enable auditors to effectively prepare for the conduct of a remote audit.

6.9 The current Procedures requires Member States to provide duly completed **pre-audit questionnaire (PAQ)** as soon as possible and not later than two months after receipt, and updated, as appropriate, not later than three months before the audit. The current PAQ provides the minimum information required by the auditors to prepare for an on-site audit. The information provided through the current PAQ, however, is not sufficient to prepare and undertake a remote audit.

6.10 To facilitate the preparation of the auditors and the conduct of a remote audit, Member States should provide additional information in the form of response to pointed questions. The pointed questions will follow the verification index and will aim to supplement the information provided through the PAQ. The pointed questions in the form of **additional pre-audit information** are set out in annex 3 to this document.

6.11 Views were expressed on the need for Member States to provide detailed information regarding each obligation shown in the latest version of the non-exhaustive list of obligations under the instruments relevant to the IMO Instruments Implementation Code (III Code), to enable the audit team to review the national legislation of the Member State in a more effective way and to facilitate the remote audit process. It was acknowledged, however, that although Member States are encouraged to identify related information as a gap analysis exercise in preparation for the audit, such request would present a significant administrative burden for Member States at this stage.

6.12 Views were also expressed in the virtual meeting of auditors that Member States will need to be guided in preparing for the remote audit, in particular in terms of documents and records that need to be made readily available for sampling in order to facilitate audit conclusions in a limited time using a remote methodology. In that respect, review of additional pre-audit information provided by Member States would enable audit team to prepare an effective **remote audit timetable** and to provide more specific guidance on the type of information and documentary evidence that will be needed to be prepared upfront for each audit area.

6.13 In addition, capabilities of Member States to engage in remote audit would need to be identified in preparation for a remote audit, including available ICT, availability of records in electronic format and/or file transfer to support sampling, acceptance by Member States of remote methodology in relation to security and confidentiality, etc. Once a decision is made to proceed with remote audit, conditions would need to be tested prior to the audit, which may require a pre-meeting with participation from the auditors and auditees.

7 Audit team

7.1 The use of partial remote audit mechanism will enable the Organization to engage more auditors, including new auditors, as there will be no travel cost involved to the Organization and the Member States. Additionally, the use of a partial remote audit mechanism will enable the audit team leaders to use their audit team members more flexibly and efficiently. Depending on the composition of the audit team, some audit team members may be required to attend only parts of the remote audit which are more relevant to their expertise.

7.2 To facilitate the communication and collaboration of the audit team members for effective and efficient audit preparation, execution and follow-up, a communication mechanism should be developed by the Organization. The communication mechanism, which may be one of the common platforms currently in use for virtual meetings, should, among others, ensure the confidentiality, security and data protection of the information exchanged between the audit team. Furthermore, the audit team members should be able to use the above-mentioned communication mechanism separately and in parallel to the communication tool to be used for performing the remote audits.

8 Conclusion

8.1 Conduct of remote audits of Member States is feasible under certain conditions. However, it should be recognized that some Member States may not be in a position to undergo partial remote audits due to the lack of the required technology.

8.2 To enable the conduct of remote audits of Member States, additional process steps and tools should be developed, including identification of Member States' capabilities to engage in remote audit, a set of additional pre-audit information and a model remote audit timetable. In addition, further guidance will need to be provided to Member States for effective preparation for the audit and additional guidance will need to be provided to the auditors.

8.3 The current Framework and Procedures does not provide for the conduct of remote audits. Thus, the Council will need to be invited to endorse the additional process steps and tools, to be developed, for conducting scheduled audits using a remote audit mechanism. Going forward, the Council could also be invited to decide whether and in which circumstances, such a mechanism could be used once the international travel returns to normal.

ANNEX 2

SUMMARY OF FEEDBACK FROM MEMBER STATES ON CAPACITIES TO CARRY OUT REMOTE AUDIT UNDER IMSAS

This summary is based on 20 responses to the questionnaire sent to 25 Member States.

| ICT (information and communication technologies) | | | Remarks/Comments from Member States |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Do you have stable internet connection/good online connection quality in the nodal entity of the State responsible for the implementation and enforcement of requirements stemming from the mandatory IMO instruments? | Yes (19) | No (1) | <ul style="list-style-type: none"> ▪ Documentation can only be accessed through authorized personnel, secure email access (three Member States). ▪ Documentation available in national language (three Member States). ▪ Access to certain facilities by video is not permitted (one Member State). ▪ There may be compatibility issues in relation to different platforms used by the various entities of the State (one Member State). ▪ There may be problems with firewalls, security measures, access to the system only through authorized personnel and secure email access among entities of the State (three Member States) |
| Do you have stable internet connection/good online connection quality in all entities of the State participating in the implementation and enforcement of requirements stemming from the mandatory IMO instruments? | Yes (18) | No (2) | |
| Specify your videoconferencing facilities and platform (Microsoft Teams, Zoom, Skype, other). | MS Teams, Zoom, Skype for Business, Google Meet | | |
| Specify if videoconferencing facilities and platforms are the same and compatible within all entities of the State participating in the audit. | Yes (18) | No (2) | |
| Specify if existing ICT capabilities allow access to relevant documented information including software, databases, records, etc. | Yes (17) | No (3) | |
| Specify if it is possible to observe the facilities, activities, etc., by video (if necessary). | Yes (19) | No (1) | |

| Maritime administration (facilities/personnel) | | | Remarks/Comments from Member States |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Do you have a suitable office/area to conduct remote audit within the nodal entity of the State responsible for the implementation and enforcement requirements stemming from the mandatory IMO instruments? | Yes (19) | No (1) | <ul style="list-style-type: none"> ▪ Confidential documents can only be accessed from the office. ▪ Connectivity issues if working from home (one Member State). ▪ Different time zones of the Member State in relation with the location of appointed audit team (three Member States). ▪ Not all personnel from entities of the State will be able to work outside the regular working hours (four Member States) |
| Do all participating entities of the State have suitable office/area to conduct remote audit? | Yes (19) | No (1) | |
| Are all the relevant personnel from all participating entities of the State able to attend remote audit from their office/respective household? | Yes (18) | No (2) | |
| Are all the relevant personnel from all participating entities of the State able to attend the remote audit from their office/household outside the regular working hours? | Yes (16) | No (4) | |

| Maritime administration (administrative/operational issues) | | | Remarks/Comments from Member States |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|---------------|----------------------------------------------------------|
| Is the nodal entity of the State responsible for the implementation and enforcement of requirements stemming from the mandatory IMO instruments performing all the regular activities? | Yes (16) | No (4) | <ul style="list-style-type: none"> ▪ None |
| Is it feasible to carry out an opening/closing meeting with all participating entities of the State responsible for the implementation of the mandatory IMO instruments? | Yes (19) | No (1) | |
| Is it feasible to deliver a presentation regarding the organization of the maritime administration (workflows/organograms) after the opening meeting? | Yes (19) | No (1) | |
| Are representatives of all participating entities of the State included in the overall strategy can attend remote audit sessions from office/households? | Yes (19) | No (1) | |
| Are all the participating entities of the State responsible for drafting/ensuring final promulgation of national legislation through the existing legal process, able to attend remote audit sessions from their office/household? | Yes (19) | No (1) | |

| Maritime administration (evidence and records) | | | Remarks/Comments from Member States |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Can access to electronic records be made available, including records of an existing management system/respective documentation and assessments/analyses? | Yes (15) | No (5) | <ul style="list-style-type: none"> ▪ Legislation is available only in national language (five Member States). ▪ Certain activities cannot be accessed by video (four Member States). ▪ Access to records available through secure email transfer (four Member States). ▪ Access to records permitted through authorized personnel (two Member States). |
| Do you have primary and subsidiary national legislation, including administrative instructions, digitalized? Or can you ensure ready and easy access to the text? | Yes (19) | No (1) | |
| Do you have processes/procedures and working instructions digitalized? Or can you ensure ready and easy access to respective documents?? | Yes (18) | No (2) | |
| Can you ensure ready and easy access to technical records of ships/all types of certificates, documents of compliance, ROs' related documentation including oversight or other related records? | Yes (17) | No (3) | |
| Can you ensure ready and easy access to documents/records related to flag State surveyors/inspectors/auditors, including their training? | Yes (18) | No (2) | |
| Can you ensure ready and easy access to documents related to flag State investigators? | Yes (18) | No (2) | |
| Do you have online training or webinars? | Yes (18) | No (2) | |
| Is it possible to observe remotely guided site visits and/or witness running processes or operations? | Yes (17) | No (3) | |
| Is it possible to observe activities that are not ongoing at the time of the audit through provision of related videos? | Yes (16) | No (4) | |

| Maritime administration (willingness to proceed with remote audit) | | | Remarks/Comments from Member States |
|-------------------------------------------------------------------------------------------------------------------|-----------------|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A revised audit plan will be required to focus on elements that can be undertaken remotely, are you ok with this? | Yes (19) | No (1) | <ul style="list-style-type: none"> ▪ Request for IMO representative to be present in order to facilitate certain administrative and coordination aspects (two Member States). ▪ Absence of ICT communication capabilities in some entities for remote audits (one Member State). ▪ Preference for onsite audit, although willing to accept remote audit under the circumstances (four Member States). ▪ Suggestion to have an onsite verification by audit team leader (ATL) after the remote part of the audit, if possible (two Member States). |
| Are you happy to proceed with a remote audit? | Yes (19) | No (1) | |

ANNEX 3

ADDITIONAL PRE-AUDIT INFORMATION

Part 1, COMMON AREAS

(please refer to sections 9 to 14 of PAQ when providing this additional information)

NOTE:

This additional pre-audit information is related to the Common Areas part of the PAQ and is intended to facilitate the Member State and the audit team in their preparation for an IMSAS audit. This document, duly completed in column (E), should be returned together with the PAQ.

The structure of this additional pre-audit information is harmonized with the sections of the PAQ and paragraph numbers of the IMO Instruments Implementation Code (III Code). The PAQ and III Code should be referred to as necessary, when completing this additional information.

The descriptions/answers in response to requests in column (D) should be provided in column (E), and the answers should contain a brief description of the relevant subject matter/process/procedure (rather than answering "YES" or "NO"). Please write "Refer to (xxx) module in GISIS" in column (E), if the relevant information is accessible through GISIS.

The responses should be clear and concise and supporting documents may be attached, such as legislation, guidelines, instructions, notices, flowcharts, procedures, diagrams, etc., which are relevant for answering the questions. Wherever possible, please provide appropriate links to the webpage from where the information can be accessed. All information provided should be in electronic format only. Any material provided may be used during the audit and in preparing the audit reports.

Please provide the following additional information in relation to PART 1, COMMON AREAS of the PAQ (sections 9 to 14):

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| | | | Strategy | |
| 1 | 9 | 3 | <p>Please provide details of an overall strategy developed by the State, with reference to paragraph 3 of the III Code.</p> <p><i>(You may include details such as:</i></p> <p><i>.1 policy level approach for implementing international treaties, legal framework and timely promulgation of legislation, legal framework through which the strategy was adopted, division of responsibilities among relevant entities, methodology for monitoring the overall organizational performance of the maritime administration, establishment and maintenance of systems, processes, facilities and human resources needed for the implementation and enforcement, review mechanism to verify effectiveness, identify shortcomings and take corrective actions, communication and engagement with relevant entities and stakeholders. Provide links to the webpage or attach relevant document;</i></p> <p><i>.2 methodology to monitor and evaluate the strategy; and</i></p> <p><i>.3 methodology to continuously review the strategy.)</i></p> | |
| | | | General | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 2 | 10 | 4 | <p>Please provide details of the process for developing national legislation while becoming a Party to a mandatory IMO instrument (in about 250 words, or as a flow chart).</p> <p><i>(You may include details such as the legal framework in the State in relation to the incorporation of international treaties into national legislation, process for developing national legislation, consultation process, process for approval by competent authority/parliament, subsidiary legislation and executive orders, etc.).</i></p> | |
| | | | <p>Initial actions</p> | |
| 3 | 10 | 8 | <p>Please provide details of the process for incorporating and giving effect to amendments to the mandatory IMO instruments that enter into force for the State (in about 250 words, or as a flow chart).</p> <p><i>(If the response is different from Q2, you may include details such as how tacit amendments to the mandatory IMO instruments are dealt with, effecting amendments to existing legislation, whether a simplified process is in place for amendments, approval by competent authority, subsidiary legislation and executive orders.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) | | |
|------------------------|------------------------------------|-----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|---------------------|------------------------|
| 4 | 10 | 8 | <p>Please provide the mechanism by which necessary infrastructure is established when a mandatory IMO instrument enters into force for the State. (in about 250 words).</p> <p><i>(You may include details such as availability of personnel, systems, processes and facilities established for the implementation and enforcement of the mandatory IMO instruments (i.e. referred to as "infrastructure" in the III Code), maritime expertise, training of personnel, material resources, administrative measures.)</i></p> | | | |
| 5 | 10 | 4 and 8 | <p>Please list national legislation that has been promulgated (complete column (E)).</p> <p><i>(You may provide details such as the primary legislation (e.g. act/decreed/order, etc.), subsidiary legislation issued under the primary legislation (e.g. rules/regulations, etc.), indicate the section/part, as relevant.)</i></p> | Instrument | Primary legislation | Subsidiary legislation |
| | | | | SOLAS 1974 | 1 2 | 1 2 3 |
| | | | | SOLAS PROT 1988 | | 1 2 |
| | | | | MARPOL 73/78 | | 1 2 |
| | | | | MARPOL PROT 1997 | | 1 2 |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) | | |
|------------------------|------------------------------------|-----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|--------------------------------------------|-----------------------------------------------------------------------|
| | | | | STCW 1978 | | 1 2 |
| | | | | LL 1966 | | 1 2 |
| | | | | LL PROT 1988 | | 1 2 |
| | | | | TONNAGE 1969 | | 1 2 |
| | | | | COLREG 1972 | | 1 2 |
| 6 | 10 | 4 and 8 | <p>Please provide an overview of national legislation that is currently in development (complete column (E)).</p> <p><i>(You may provide details such as ongoing work on legislation, draft bills, draft regulations, proposals for amendments to existing laws, interim measures for giving effect to treaties.)</i></p> <p><i>Note: Legislation in the development stage at the time of the audit cannot be considered as evidence of compliance, but this information may provide clarity on activities of the State.</i></p> | Instrument | Primary legislation in progress (e.g. Act) | Subsidiary legislations in progress (e.g. rules, regulations, orders) |
| | | | | SOLAS 1974 | | 1 2 |
| | | | | SOLAS PROT 1988 | | 1 2 |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) | | |
|------------------------|------------------------------------|-----------------------------------------------|---------------------------------------------|------------------------------------------------------|--|--------|
| | | | | MARPOL 73/78 | | 1 2 |
| | | | | MARPOL PROT 1997 | | 1 2 |
| | | | | STCW 1978 | | 1 2 |
| | | | | LL 1966 | | 1 2 |
| | | | | LL PROT 1988 | | 1 2 |
| | | | | TONNAGE 1969 | | 1 2 |
| | | | | COLREG 1972 | | 1 2 |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) | |
|------------------------|------------------------------------|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|-----------------------------------------------------------------------------|
| 7 | 10 | 8.3 | <p>Please provide information about the resources available to assist in the promulgation of maritime legislation (in about 250 words).</p> <p><i>(You may provide information such as key personnel associated with drafting and the promulgation of maritime legislation, including reporting to IMO, their qualifications and experience, an overview of their roles and responsibilities.)</i></p> | | |
| | | | Communication of Information | | |
| 8 | 11 | 9 | <p>Please provide an overview of the process/procedure for communicating information and/or reporting to IMO (in about 250 words).</p> <p><i>(You may include details such as information on reporting national laws to IMO, procedure for sending reports to IMO, how the data is kept updated in GISIS modules, coordination between entities in the maritime administration, responsibility for communication to IMO, reviewing and updating information in GISIS, etc.)</i></p> | | |
| 9 | 11 | 9 | | Instrument | National legislation, number of equivalents/exemptions granted by the State |
| | | | | SOLAS 1974 | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) | |
|------------------------|------------------------------------|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|--|
| | | | <p>Please provide the information communicated to IMO in relation to the mandatory IMO instruments.</p> <p><i>(If the information on equivalents/exemptions granted under the mandatory IMO instruments have not been uploaded in GISIS, please attach a summary of equivalents/exemptions issued and communication of these to IMO, national legislation communicated to IMO, provide samples of reports sent to IMO etc.)</i></p> | SOLAS PROT 1988 | |
| | | | | MARPOL 73/78 | |
| | | | | MARPOL PROT 1997 | |
| | | | | STCW 1978 | |
| | | | | LL 1966 | |
| | | | | LL PROT 1988 | |
| | | | | TONNAGE 1969 | |
| | | | | COLREG 1972 | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| | | | Records | |
| 10 | 13 | 10 | <p>Please describe a record management system that is in place in various ministries/entities of the maritime administration (in about 250 words).</p> <p><i>(You may include details such as rules/regulations for record keeping, archival/detailed list of records reflecting dates of creation/places of retention/methods of storage/retrieval/disposition of records, procedures through quality management system (if any), life cycle management of records, type of records kept by various entities in the maritime administration in relation to the implementation and enforcement of the mandatory IMO instruments, document control.)</i></p> | |
| | | | Improvement | |
| 11 | 14 | 11 and 12 | <p>Please describe the measures that are in place for improvement of performance in the maritime sector.</p> <p><i>(You may include details such as links to an overall strategy, periodical reports to higher authorities, performance reviews, such as annual reports, continual training programme, career development and progression, incentives, capacity building, regional and national drills on safety and pollution prevention, details on quality management systems established in various State entities, availability of resources, coordination between entities.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 12 | 14 | 13 | <p>Please provide steps taken to identify and address non-conformities (in about 250 words).</p> <p><i>(You may include details such as outcome of periodical reviews and any corrective actions decided; handling of complaints and feedback from stakeholders; analysis of data, such as violations, marine casualties, pollution incidents, reports from external sources such as port State Control (PSC) and international bodies; development of corrective actions and monitoring of their implementation - please provide examples.)</i></p> | |
| 13 | 14 | 14 | <p>Please provide details of the proactive measures to identify and address potential non-conformities (in about 250 words).</p> <p><i>(You may include details such as risk management, analyses of data, probability of occurrence, proactive measures to prevent occurrence, trend analyses and related actions, details of related procedures within quality management systems established in various State entities, links to an overall strategy, review mechanism - please provide examples.)</i></p> | |

ADDITIONAL PRE-AUDIT INFORMATION

Part 2, FLAG STATES

(please refer to sections 15 to 24 of PAQ when providing this additional information)

NOTE:

This additional pre-audit information is related to the Flag States part of the PAQ and is intended to facilitate the Member State and the audit team in their preparation for an IMSAS audit. This document, duly completed in column (E), should be returned together with the PAQ.

The structure of this additional pre-audit information is harmonized with the sections of the PAQ and paragraph numbers of the IMO Instruments Implementation Code (III Code). The PAQ and III Code should be referred to as necessary, when completing this additional information.

The descriptions/answers in response to requests in column (D) should be provided in column (E), and the answers should contain a brief description of the relevant subject matter/process/procedure (rather than answering "YES" or "NO"). Please write "Refer to (xxx) module in GISIS" in column (E), if the relevant information is accessible through GISIS.

The responses should be clear and concise and supporting documents may be attached, such as legislations, guidelines, instructions, notices, flowcharts, procedures, diagrams, etc., which are relevant for answering the questions. Wherever possible, please provide appropriate links to the webpage from where the information can be accessed. All information provided should be in electronic format only. Any material provided may be used during the audit and in preparing the audit reports.

Please provide the following additional information in relation to PART 2, FLAG STATES of the PAQ (sections 15 to 24):

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| | | | Implementation | |
| 14 | 15 | 15.1 | <p>Please describe the structure and duties of the entity(ies) that have been entrusted with the responsibilities for developing flag State policies and implementing them through issuing national legislation and guidelines (provide a description not exceeding 250 words).</p> <p><i>(You may include areas such as the entities responsible for flag State implementation, resources available in the Administration, measures in place to assist in the implementation, such as issuance of circulars or guidance, links to the overall strategy of the State etc.)</i></p> <p><i>Note: If the Administration exercises its functions through an extraterritorial office, please include the description of such arrangement, including relevant legal basis.</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 15 | 15 | 15.2 | <p>Please describe the mechanism and responsibilities within the Administration to review the adequacy of existing policies, legislation, guidance, etc., and to update them as necessary (provide a description not exceeding 250 words).</p> <p><i>(You may include areas such as, review mechanism, follow-up actions, responsibilities assigned to relevant entities, communication and reporting systems, links to the overall strategy of the State etc.)</i></p> | |
| 16 | 15 | 17 | <p>Please provide the procedures followed while issuing safe manning documents for ships flying the flag of the State.</p> <p><i>(You may include information such as, the related legislation, entity issuing the safe manning document, transparent procedure for establishing minimum safe manning, reference to the relevant IMO resolution, measures to ensure safe continuous watch on ships, working language on ships, a model safe manning document.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 17 | 16.1 | 16.1 | <p>Please provide an overview of administrative and technical instructions that have been issued by the Administration for implementing the mandatory IMO instruments and national regulations (in about 250 words).</p> <p><i>(You may include areas such as, the procedures for issuance of instructions; document control; list of guidance/notices, executive orders; methods for dissemination to the flag State surveyors, industry, recognized organizations (ROs) and seafarers.)</i></p> | |
| 18 | 16.1 | 16.2 | <p>Please provide a description about the resources and systems established to verify effectiveness in the implementation of the mandatory IMO instruments.</p> <p><i>(You may include areas such as, resources available in the Administration, responsibilities and procedures for the issuance of statutory certificates and documents by the Administration, details of an independent audit and inspection programme in relation to processes through which such certificates are issued by the Administration, as applicable (e.g. ISM certificates, safe manning documents, continuous synopsis records).)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 19 | 16.1 | 16.3 | <p>Please provide an overview of the organizational arrangements, resources and the system in place for compliance with the requirements related to training, certification and watchkeeping of seafarers.</p> <p><i>(You may include a brief description (in about 250 words) of the training and certification in the State, arrangements in place for investigation into reported incompetence, withdrawal or suspension or cancellation of certificates or endorsements.)</i></p> | |
| 20 | 16.1 | 16.3 | <p>If the State recognizes certificates issued by another Party, in accordance with regulation I/10 of STCW 1978, please confirm whether the reports have been communicated to IMO, referring to section A-I/7, paragraph 3.2 of the STCW Code.</p> <p><i>(You may include information on the latest report to IMO on the measures taken to ensure compliance with regulation I/10.)</i></p> | |
| 21 | 16.1 | 16.3 | <p>Has the State communicated to IMO a report related to information pursuant to article IV and regulation I/7 of STCW 1978, as well as a report on dispensations issued each year pursuant to article VIII of STCW 1978?</p> <p><i>(You may include information on the initial and subsequent reports to IMO referring to section A-I/7 of the STCW Code, confirmation by the Maritime Safety Committee, the latest report to IMO on dispensations granted by the Administration, periodicity of sending these reports to IMO.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 22 | 16.1 | 16.3 | <p>Has the State communicated the results of periodic evaluations pursuant to regulation I/8.3 of STCW 1978 (and sections A-I/7.4 and A-I/8.3 of the STCW Code) to IMO?</p> <p><i>(You may include information on the latest evaluation report to IMO, periodicity of sending these reports to IMO. Attach a copy of the report.)</i></p> | |
| 23 | 16.2 | 16.5 | <p>How does the State implement those requirements that are left to "<i>the satisfaction of the Administration</i>" in the mandatory IMO instruments (not exceeding 250 words).</p> <p><i>(You may include information such as, the policies/criteria/guidelines developed by the Administration to deal with those requirements that are to the satisfaction of the Administration (type approval, materials), including the use of recommendations from IMO and classification societies; examples to demonstrate the system in place; expertise and resources available in the Administration.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| | | | Delegation of Authority | |
| 24 | 17 | 18 | <p>Please describe how the system/process used for the delegation of authority is regulated while recognizing and authorizing organizations to act on behalf of the State.</p> <p><i>(You may include information such as, the provisions for delegation of authority through law/orders, procedure for recognizing and authorizing organizations, implementation of the RO Code.)</i></p> | |
| 25 | 17 | 21 | <p>Please describe how the system/process followed for the delegation of authority is regulated while recognizing and authorizing nominated surveyors to act on behalf of the State.</p> <p><i>(You may include information such as, the relevant rules/regulations, orders, procedure for delegation of authority to individuals, procedure for selection and appointment of nominated surveyors, implementation of the RO Code.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 26 | 17 | 21 | <p>Please provide information about the nominated surveyor(s) appointed by the State, if applicable.</p> <p><i>(You may include information such, as the list of nominated surveyors appointed to act on behalf of the State for conducting surveys, inspections and audits, issuing of certificates and documents, marking of ships and other statutory work required by the mandatory IMO instruments; scope of delegated authority to nominated surveyors; implementation of the RO Code; example of authorization document/formal agreement with nominated surveyors).</i></p> | |
| | | | <p>Enforcement</p> | |
| 27 | 20 | 22.5 to 22.8 | <p>Please provide details of the legal framework to initiate enforcement actions where breaches of provisions of the mandatory IMO instruments have been identified.</p> <p><i>(You may include information such as, relevant extracts from acts/regulations, authority and responsibilities for enforcement, penalty provisions, availability of resources, mechanism for monitoring violations, provisions to initiate actions irrespective of where the violation has occurred, etc.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 28 | 20 | 22 | <p>What measures have been adopted by the State to detect violations or non-compliances and to enforce legal provisions.</p> <p><i>(You may include information such as reference to relevant legislation, the policies adopted to discourage violation, penalty provisions, administrative sanctions, suspension or withdrawal of certificates and endorsements, policy on periodic inspection of ships, verifying familiarization of seafarers, confirming safe manning on ships, preventing fatigue of seafarers, preventing drug and alcohol abuse, arrangements for safe continuous watch, review of information from external sources and port States, instructions to ROs, complaint mechanism for seafarers, provisions to initiate actions irrespective of where the violation has occurred.)</i></p> | |
| 29 | 21 | 23 | <p>Please provide a description of a control and monitoring programme in the Administration.</p> <p><i>(You may include details such as the arrangements for prompt conduct of casualty investigations, collection and analyses of statistical data, timely response to deficiencies on ships and alleged pollution incidents reported to the Administration.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 30 | 21 | 24 | <p>Provide an overview about the resources available in the Administration in relation to enforcement.</p> <p><i>(You may include information such as the availability of personnel in the Administration, their roles, flag State surveyors/inspectors, authority for enforcement, arrangements training for personnel, oversight of flag State surveyors/inspectors and investigators, powers to take action irrespective of where the violation has occurred.)</i></p> | |
| 31 | 21 | 25 | <p>Please describe the mechanism for monitoring ships flying the flag of the State that are detained by a port State.</p> <p><i>(You may include information such as, the procedure followed by the State when ships entitled to fly its flag are detained by a port State, role of ROs, list of ships detained under PSC in the preceding year, how corrective actions and follow-up are carried out, resources in the Administration, instruction to Ros.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 32 | 21 | 26 | <p>Please describe the mechanism in place to ensure that international certificates or documents are only issued or endorsed to a ship, after it is determined that the ship meets all applicable requirements.</p> <p><i>(You may include information such as, instructions to surveyors and ROs on issuance/endorsement of certificates/documents, how to deal with non-compliances, grant of exemptions or short-term certificates, circumstances when issuance/endorsement of certificates/documents should be withheld; control measures; obligation for communication to Administration about deficiencies.)</i></p> | |
| | | | <p>Flag state surveyors</p> | |
| 33 | 22 | 28 | <p>Please provide an overview of the responsibilities and authority of surveyors/inspectors/auditors and investigators.</p> <p><i>(You may include information such as, the field offices, place of posting, reporting structure and interrelationship within the Administration, duties and responsibilities as stipulated in national legislation.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 34 | 22 | 28 and 29 | <p>Please provide a description of the recruitment process of personnel responsible for surveys, inspections and audits of ships.</p> <p><i>(You may include information such as, category of surveyors/inspectors, number of posts, recruitment rules/procedures, minimum qualification and experience prescribed for appointment as surveyor/inspector/auditor/investigator, recruitment process, identification document.)</i></p> | |
| 35 | 22 | 35 | <p>Please provide an overview of the documented system in place for qualification and training of surveyors/inspectors/auditors/investigators.</p> <p><i>(You may include information such as, rules, regulations or standards established for documenting qualification of personnel; assessing their training needs, documenting the training provided to each member of the staff to continuously update their knowledge - induction training, in-service training, mechanism in place for updating of knowledge; availability of resources to maintain the system; and provide samples of how qualification and training is documented.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| | | | Flag state investigations | |
| 36 | 23 | 38 to 41 | <p>Describe the organizational structure, legal framework and process/procedure in the State for conducting marine safety investigations (in about 250 words. Attach flow charts, if necessary).</p> <p><i>(You may include information such as, extract of relevant legislation, policies and guidance, obligations to report casualties, availability of resources, entity responsible for investigations, oversight of investigations, appointment of investigators, types of ships covered, time framework for preparing reports, release of investigation reports.)</i></p> | |
| 37 | 23 | 39 | <p>Describe the process followed in the State for recruitment of marine safety investigators.</p> <p><i>(You may include information such as, the minimum qualification and experience prescribed, number of marine safety investigators in the State, duties and responsibilities, reporting structure.)</i></p> | |
| 38 | 23 | 41 | <p>Describe how the Casualty Investigation Code has been incorporated into the legal framework in the State and how related guidelines developed by the Organization have been followed.</p> <p><i>(You may include information such as implementation of the Casualty Investigation Code, investigation and reporting process, impartiality and objectivity in investigations, reporting to IMO, training of investigators, dissemination of lessons learnt.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 39 | 23 | 41 | <p>Please provide a summary of marine casualties that have occurred, and investigations conducted.</p> <p><i>(You may include information such as, a list of marine casualties (categorized as very serious casualties, marine casualties or marine incidents), status of safety investigations and reporting for each, sample investigation reports, release of the reports to the public and reporting to IMO.)</i></p> | |
| | | | <p>Evaluation and review</p> | |
| 40 | 24 | 42 to 44 | <p>Provide an overview of the evaluation of performance as a flag State and the outcome of the evaluation process.</p> <p><i>(You may include information such as, the methodology or procedure or process adopted for evaluation, entities responsible for evaluation and review of flag State functions, how often an evaluation is carried out, parameters or key performance indicators considered for evaluation such as those in paragraph 43 and 44 of the III Code, adequacy of staff and resources, actions taken after an evaluation, sample of an evaluation report, link of the evaluation process to the overall strategy of the State etc.)</i></p> | |

ADDITIONAL PRE-AUDIT INFORMATION

Part 3, COASTAL STATES

(please refer to sections 25 to 27 of PAQ when providing this additional information)

NOTE:

This additional pre-audit information is related to the Coastal States part of the PAQ and is intended to facilitate the Member State and the audit team in their preparation for an IMSAS audit. This document, duly completed in column (E), should be returned together with the PAQ.

The structure of this additional pre-audit information is harmonized with the sections of the PAQ and paragraph numbers of the IMO Instruments Implementation Code (III Code). The PAQ and III Code should be referred to as necessary, when completing this additional information.

The descriptions/answers in response to requests in column (D) should be provided in column (E), and the answers should contain a brief description of the relevant subject matter/process/procedure (rather than answering "YES" or "NO"). Please write "*Refer to (xxx) module in GISIS*" in column (E), if the relevant information is accessible through GISIS.

The responses should be clear and concise and supporting documents may be attached, such as legislations, guidelines, instructions, notices, flowcharts, procedures, diagrams, etc., which are relevant for answering the questions. Wherever possible, please provide appropriate links to the webpage from where the information can be accessed. All information provided should be in electronic format only. Any material provided may be used during the audit and in preparing the audit reports.

Please provide the following additional information in relation to PART 3, COASTAL STATES of the PAQ (sections 25 to 27):

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| | | | Implementation | |
| 41 | 25 | 46.1 | <p>Please describe the structure and duties of the entity(ies) that have been entrusted with the responsibilities for developing coastal State policies and implementing them through issuing national legislation and guidelines (provide a description not exceeding 250 words).</p> <p><i>(You may include details of the entities in the maritime administration responsible for the implementation of various coastal State activities – you may be guided by paragraph 48 of the III Code, material and human resources available with these entities, measures in place to assist in the coastal State implementation such as issuance of circulars or guidance, how different functions related to coastal State implementation are linked to the overall strategy of the State etc.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 42 | 25 | 46.2 | <p>Please describe the mechanism and responsibilities in the maritime administration to review the adequacy of existing policies, legislation, guidance, etc., and to update them as necessary (provide a description not exceeding 250 words).</p> <p><i>(You may include areas such as, a review mechanism, follow-up actions, responsibilities assigned to relevant entities, coordination with the entities, communication and reporting systems, link to the overall strategy of the State etc.)</i></p> | |
| 43 | 25 | 47 | <p>Please provide the details of national legal framework in relation to the establishment and functions of maritime radiocommunication services in the State.</p> <p><i>(e.g. provide information on relevant legislation, guidelines and procedures on establishment and maintenance of shore-based facilities for space and terrestrial radiocommunication services in designated sea areas, and on managing registration of GMDSS identities, or link to relevant webpage.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 44 | 25 | 47 | <p>Please provide details of the entity responsible for maritime radiocommunication services in the State.</p> <p><i>(e.g. provide information on entity(ies) in the State (or provided in cooperation with other States), who are responsible for transmitting navigational warnings, danger messages, weather information to ships, extent of radiocommunication services established, radiocommunication equipment, staff, etc.)</i></p> | |
| 45 | 25 | 47 | <p>Please provide the details of national legal framework in relation to collection, examination, and dissemination of meteorological data.</p> <p><i>(While providing descriptions/answers, please use the attached guidance from World Meteorological Organization (Annex to document MSC 102/22/3). Please provide information on legislation, guidelines and procedures on collection and analysis of meteorological data in the State (or in cooperation with other States), as well as related responsibilities, or links to relevant web pages.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 46 | 25 | 47 | <p>How meteorological data are gathered and analysed, and how meteorological information and warnings are transmitted/disseminated by the State.</p> <p><i>(e.g. provide the following details:</i></p> <p><i>.1 Is marine forecasts and warnings provided for coastal waters within your national jurisdiction?</i></p> <p><i>.2 If NO, outline reasons for not providing marine forecasts and warnings to ships; and</i></p> <p><i>.3 If YES, include details of forecasting services provided to ships, such as wind speed and direction, wave conditions, reduced visibility, ice-conditions, warnings issued to ships, schedule for broadcasting weather information, entity(ies) responsible, the process to encourage ships under your flag to make and record weather observations and to share these observations with the relevant meteorological service provider.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 47 | 25 | 47 | <p>Please provide the details of national legal framework dealing with maritime search and rescue services (SAR) in the State?</p> <p><i>(e.g. provide information on relevant legislation, guidelines and procedures on SAR, or links to relevant webpage).</i></p> | |
| 48 | 25 | 47 | <p>Please provide details of the entity responsible for maritime SAR in the State, including its responsibilities.</p> <p><i>(e.g. describe arrangements for distress communication and coordination in maritime SAR; existing SAR facilities; cooperation with other States; plans of cooperation with SAR services for passenger ships, including related SAR drills to test effectiveness; communication of information to IMO.)</i></p> | |
| 49 | 25 | 47 | <p>Please provide the details of national legal framework in relation to collection, compilation, and dissemination of hydrographic data in the State.</p> <p><i>(e.g. provide information on relevant legislation, guidelines and procedures on hydrographic services, or link to relevant webpage.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 50 | 25 | 47 | <p>Please provide details of the entity responsible for hydrographic services in the State, including its responsibilities.</p> <p><i>(While providing descriptions/answers, please use the attached guidance from International Hydrographic Organization (Annex to document MSC 81/24/4). Provide information on arrangements for collection and compilation of hydrographic data, existing resources for hydrographic surveying, publication and dissemination of nautical information, hydrographic services, issuance of nautical publications such as, notices to mariners, charts, tide tables etc., cooperation with other States, international standards adopted, data management, etc.)</i></p> | |
| 51 | 25 | 47 | <p>If mandatory ship routeing, ship reporting systems or vessel traffic services (VTS) have been established in the State, please provide the details.</p> <p><i>(e.g. provide list of existing mandatory ship routeing/reporting/VTS systems, agreement with other States (if any), method of dissemination of information to ships, monitoring arrangements, periodical review of the services, entities responsible, existing resources, etc.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 52 | 25 | 47 | <p>Please provide the details of national legal framework on the establishment and operation of aids to navigation (AtoN) in the State.</p> <p><i>(While providing descriptions/answers, please use the attached guidance from International Association of Marine Aids to Navigation and Lighthouse Authorities (Annex to document MSC 103/20/9). Please provide information on relevant legislation, guidelines and procedures on AtoN, or link to relevant webpage; describe arrangements for establishment and maintenance of AtoN, assignment of responsibility.)</i></p> | |
| 53 | 25 | 47 | <p>Please provide details of the entity responsible for AtoN services in the State.</p> <p><i>(e.g. provide details on entity(ies) responsible for establishing and maintaining, list of available AtoN in the State, standards used for AtoN, dissemination of AtoN information to ships, existing resources, review of adequacy of AtoN facilities, etc.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| | | | Enforcement | |
| 54 | 26 | 49 | <p>Please provide details of enforcement measures taken by the State to ensure observance of the mandatory IMO instruments as a coastal State.</p> <p><i>(e.g. describe policies, legislation and guidance for enforcement, monitoring mechanism to detect violations (e.g. safety of navigation, pollution), deterrent measures established, how violations are detected and dealt with, how obligations of the State are fulfilled, resources available, etc.)</i></p> | |
| 55 | 26 | 50 | <p>Please provide details of a control and monitoring programme relating to coastal State activities that has been developed and implemented by the State.</p> <p><i>(e.g. describe how statistical data is collected and analysed and for which areas of coastal State activities; mechanisms in place for timely response to pollution incidents (please include oil spill contingency plan if available); and arrangements for cooperation with other States in investigation of maritime casualties.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| | | | Evaluation and review | |
| 56 | 27 | 51 | <p>Please describe arrangements in place for conducting periodical evaluation in exercising rights and meeting the obligations of the State as a coastal State, for all entities of the maritime administration involved in the implementation of coastal State activities.</p> <p><i>(You may include information such as the methodology used for evaluation, entities responsible for evaluation and review of various coastal State functions, how often an evaluation is carried out, parameters or key performance indicators considered for evaluation, action taken after review/evaluation, sample of an evaluation report, link of the evaluation process to the overall strategy of the State, etc.)</i></p> | |

ADDITIONAL PRE-AUDIT INFORMATION

Part 4, PORT STATES

(please refer to sections 28 to 29 of PAQ when providing this additional information)

NOTE:

This additional pre-audit information is related to the Port States part of the PAQ and is intended to facilitate the Member State and the audit team in their preparation of an IMSAS audit. This document, duly completed in column (E), should be returned together with the PAQ.

The structure of this additional pre-audit information is harmonized with the sections of the PAQ and paragraph numbers of the IMO Instruments Implementation Code (III Code). The PAQ and III Code should be referred to as necessary, when completing this additional information.

The descriptions/answers in response to requests in column (D) should be provided in column (E), and the answers should contain a brief description of the relevant subject matter/process/procedure (rather than answering "YES" or "NO"). Please write "*Refer to (xxx) module in GISIS*" in column (E), if the relevant information is accessible through GISIS.

The responses should be clear and concise and supporting documents may be attached, such as legislation, guidelines, instructions, notices, flowcharts, procedures, diagrams, etc., which are relevant for answering the questions. Wherever possible, please provide appropriate links to the webpage from where the information can be accessed. All information provided should be in electronic format only. Any material provided may be used during the audit and in preparing the audit reports.

Please provide the following additional information in relation to PART 4, PORT STATES of the PAQ (sections 28 to 29):

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| | | | Implementation | |
| 57 | 28 | 54.1 | <p>Please provide an overview of the structure and duties of the entity(ies) that have been entrusted with the responsibilities for developing port State policies and implementing them through issuing national legislation and guidelines (provide a description not exceeding 250 words).</p> <p><i>(You may include areas such as the entities in the maritime administration responsible for port State implementation, material and human resources available with these entity(ies), measures in place to assist in the port State implementation such as issuance of circulars or guidance, how different functions related to port State implementation are linked to the overall strategy of the State etc.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 58 | 28 | 54.2 | <p>Please describe the mechanism and responsibilities in the maritime administration to review adequacy of existing policies, legislation, guidance, etc., on port State implementation and to update them as necessary (provide a description not exceeding 250 words).</p> <p><i>(You may include areas such as, a review mechanism, follow-up actions, responsibilities assigned to relevant entities, coordination with the entities such as ports, reception facilities, fuel oil suppliers, communication and reporting systems, link to the overall strategy of the State etc.)</i></p> | |
| 59 | 28 | 55 | <p>Please describe the legal framework in relation to transport of dangerous goods through the ports in the State. Provide a copy of the relevant national legislation.</p> <p><i>(e.g. provide information on the relevant legislation that gives effect to the IMDG Code, or links to relevant webpage, state responsibilities assigned to various State entities, etc.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 60 | 28 | 55 | <p>Please provide a brief description how transport of dangerous goods through ports in the State is regulated (in about 250 words).</p> <p><i>(e.g. measures taken for stowage and segregation of dangerous goods, training of shore-side personnel, details of designated port State authority, detailed instructions issued on emergency response and first aid, measures for marking and labelling of packaged goods.)</i></p> | |
| 61 | 28 | 55 | <p>Please list the national legislation, guidance and procedures that deal with transport of grain, bulk cargoes and liquid chemicals through the ports in the State. Provide a copy of the relevant documents.</p> <p><i>(e.g. provide information on the legislation that gives effect to the IMSBC Code, the Grain Code and the IBC Code), state responsibilities assigned to various State entities, etc.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 62 | 28 | 55 | <p>Please provide a brief description how transport of bulk cargo, grain and liquid chemicals through seaports in the State is regulated (in about 250 words).</p> <p><i>(e.g. the obligation imposed on the shipper to provide all necessary information to ensure safe transport of the cargo before loading, material safety data sheet, information on cargoes which are subject to liquefaction and hazardous cargo in bulk, export/import of solid bulk cargo, compliance with the IMSBC Code, the Grain Code and the IBC Code.)</i></p> | |
| 63 | 28 | 55 | <p>Please provide the legislation that deals with transport of general cargo and containers through seaports in the State. Provide a copy of the relevant document.</p> <p><i>(e.g. provide information on the legislation that gives effect to SOLAS 1974 in relation to transport of dangerous goods in packaged form, obligations of shipper.)</i></p> | |
| 64 | 28 | 55 | <p>Please provide a brief description how transport of general cargo and containers through the ports in the State is regulated (in about 250 words).</p> <p><i>(e.g. details on verification of gross mass of general cargo and containers, marking and labelling, implementation of obligations of shipper, material safety data sheet.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 65 | 28.1 to 28.5 | 60 | <p>Please state whether the right to carry out port State control (PSC) is exercised by the State. If yes, describe the processes established to administer a PSC programme.</p> <p><i>(e.g. annual targets, ports or terminals where ships are inspected, number of port State control Officers (PSCOs), standards established (e.g. rules, regulations, orders), procedures for inspection and detention, reporting of detentions.)</i></p> | |
| 66 | 28.1 to 28.5 | 60 | <p>Please describe the legal framework in the State that permits control measures to be undertaken on foreign ships visiting your ports. Provide a copy of relevant documents.</p> <p><i>(e.g. describe the measures for detection of violations and enforcement of regulations, how the authority for conducting port State control (PSC) inspections is provided for in national legislation, powers to detain ships, and to avoid a ship being unduly detained or delayed.)</i></p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 67 | 28.6 | 54 and 56.1 | <p>Please describe the legal framework in the State and administrative measures in place for providing adequate reception facilities, or capability to accept all waste streams, as required by MARPOL.</p> <p><i>(e.g. list and provide legislation and administrative measures taken to provide and maintain reception facilities, in relation to Annexes I (reg.38), II (reg.18), IV (reg. 12 and 13), V (reg.8) and VI (reg.17) of MARPOL, provision of facility through regional cooperation arrangements.)</i></p> | |
| 68 | 28.6 | 54 and 56.1 | <p>Please provide an overview about the provision of reception facilities in the State where international ships call.</p> <p><i>(If the information on reception facilities in GISIS is not up to date, provide a list of reception facilities such as location, capacity and available facilities and other characteristics in relation to Annexes I, II, IV, V and VI of MARPOL, entities responsible for establishing and maintaining the facilities, actions taken on reports of non-availability of reception facilities etc.)</i></p> | |
| 69 | 28.6 | 54 and 56.1 | <p>Please provide a brief description on how discharge from chemical tankers (Annex II of MARPOL 73/78) is controlled.</p> | |

| Question number (A) | Reference to section of PAQ (B) | Reference to paragraph of the III Code (C) | Information sought from Member State (D) | Descriptions/answers and supporting documents (E) |
|------------------------|------------------------------------|-----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| | | | <i>(e.g. provide a list of ports where cargoes carried by chemical tankers are discharged/loaded, measures of control established for discharging/loading and discharge of tank washings.)</i> | |
| 70 | 28.7 | 54 and 56.3 | <p>If fuel oil for combustion purposes is made available to ships, please describe how the fuel oil quality is regulated.</p> <p><i>(e.g. whether a register of local suppliers of fuel oil is maintained, bunker delivery note is provided, how the fuel oil quality is regulated.)</i></p> | |
| | | | Evaluation and review | |
| 71 | 29 | 63 | <p>Please describe the measures in place for conducting periodical evaluation in exercising rights and meeting the obligations of the State as a port State.</p> <p><i>(You may include information such as the methodology used for evaluation, entities responsible for evaluation and review of various port State functions, how often an evaluation is carried out, parameters or key performance indicators considered for evaluation, action taken after review/evaluation, sample of an evaluation report, link of the evaluation process to the overall strategy of the State etc.)</i></p> | |

ANNEX 4

**[DRAFT] MODEL DETAILED REMOTE AUDIT TIMETABLE AND PROGRAMME
[MEMBER STATE] [DATE]**

| Day 1 - Common Areas | | | | | |
|-----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| Duration¹ | Activity | Participants | State entity and Location² | Remarks on method of auditing | Interaction (Off-site/On-site/Hybrid) |
| 60 min | Opening Meeting | All auditors [Member State representatives/bodies] | | Video call: Speeches, introduction and presentation of the audit | Off-site |
| 15 min | Break | | | | |
| 90 min | Introduction: <ul style="list-style-type: none"> • Overall maritime strategy • Structure and responsibilities of entity(ies) comprising the maritime administration (Ministries and other agencies involved in implementation and enforcement of relevant IMO instruments) • Processes for continual review • Risk analysis and performance measurement/evaluation/improvement • Controlling | All auditors [Member State representatives/bodies] | | Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, records, procedures, workflows, etc. | Off-site |
| 120 min | Half day break Debriefing and private meeting | All auditors | | | |

¹ Indicated duration of audit sessions take into account increased time necessary for remote audit.

² Location applies only for on-site parts of the audit, if applicable.

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|-----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| <p>120 min (with intermediate break of 15 min)</p> | <p>Legislation process:</p> <ul style="list-style-type: none"> • Legal basis for enforcement of IMO instruments through national laws: process for the integration of IMO mandatory instruments and their amendments into national law • Promulgation of national laws and amendments: How a treaty is ratified/promulgated/implemented and enforced? (e.g. SOLAS) • Relevant principal legislations under various ministries (SOLAS, MARPOL, STCW, LL, COLREG) • Investigative and penal process, enforcement, assessment of fines and penalties • Review of legislation, interpretations and guidance notes | <p>All auditors</p> <p>[Member State representatives/bodies]</p> | | <p>Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation</p> <p>Document and data review: Review of documented evidence, records, procedures, workflows, etc.</p> | <p>Off-site</p> |
| <p>End of day 1</p> | <p>Debriefing and private meeting</p> | <p>All auditors</p> | | | |

| Day 2 – Morning session - Common Areas (Cont.) | | | | | |
|------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|---------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| Duration | Activity | Participants | State entity and Location | Remarks on method of auditing | Interaction (Off-site / On-site/Hybrid) |
| 90 min | Improvement of performances of the State (common areas): <ul style="list-style-type: none"> • Measures taken to give effect to ratified treaties • Continual training programmes • National and regional drills • Rewards and incentive mechanisms • Evaluation and review of State's performances | All auditors [Member State representatives/ bodies] | | Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, records, procedures, workflows, etc. | Off-site |
| 15 min | Break | | | | |
| 60 min | Reporting and records: <ul style="list-style-type: none"> • Reporting and communication of information to IMO • Records keeping | | | Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, records, procedures, workflows, etc. | |
| 120 min | Half day break Debriefing and private meeting | All auditors | | | |

| Day 2 – Afternoon session – Flag State activities | | | | | |
|----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| 120 min (with intermediate break of 15 min) | Review of policies for the implementation and enforcement of SOLAS 1974: <ul style="list-style-type: none"> • Implementation and enforcement • Safety, design and construction, stability, equipment approval • Survey and certification • Safe manning • Exemptions, equivalent, dispensations • Control measures, FSI, outcome of PSC inspections, review and improvement • Interpretations left to the "satisfaction of the Administration" • Reporting to IMO | Auditor(s) [to be determined] [Member State representatives/ bodies] | | Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, records, procedures, workflows, etc. | Off-site |
| End of day 2 | Debriefing and private meeting | All auditors | | | |

| Day 3 – Flag State activities (Cont.) | | | | | |
|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| Duration | Activity | Participants | State entity and Location | Remarks on method of auditing | Interaction (Off-site/On-site/Hybrid) |
| 120 min (with intermediate break of 15 min) | Review of policies for the implementation and enforcement of MARPOL: <ul style="list-style-type: none"> • Implementation and enforcement • Environment protection measures, penal provisions, enforcement • Survey and certification • Exemptions, equivalent, dispensations • Control measures, FSI, review and improvement • Interpretation • Reporting to IMO | Auditor(s) [to be determined] [Member State representatives/bodies] | | Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, records, procedures, workflows, etc. | Off-site |
| 120 min | Half day break Debriefing and private meeting | All auditors | | | |
| 90 min | Review of policies for the implementation and enforcement of STCW 1978: <ul style="list-style-type: none"> • Implementation and enforcement of STCW • Training assessment and certification • Dispensation • Investigation into incompetence • Review and improvement • Reporting to IMO | Auditor(s) [to be determined] [Member State representatives/bodies] | | Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, records, procedures, workflows, etc. | Off-site |
| 15 min | Break | | | | |

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|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|
| <p>60 min</p> | <p>Review of policies for the implementation and enforcement of COLREG 1972, TONNAGE 1969 and Load Lines 1966:</p> <ul style="list-style-type: none"> • Implementation and enforcement • Equipment approval • Exemptions, equivalent, dispensations • Survey and certification • Control measures, FSI, PSC, review and improvement • Interpretations left to the "satisfaction of the Administration" • Reporting to IMO | <p>Auditors(s) [to be determined]</p> <p>[Member State representatives/ bodies]</p> | | <p>Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation</p> <p>Document and data review: Review of documented evidence, records, procedures, workflows, etc.</p> | <p>Off-site</p> |
| <p>End of day 3</p> | <p>Debriefing and private meeting</p> | <p>All auditors</p> | | | |

| Day 4 – Flag State activities (Cont.) | | | | | |
|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| Duration | Activity | Participants | State entity and Location | Remarks on method of auditing | Interaction (Off-site/On-site/Hybrid) |
| 90 min | Introduction to RO and implementation <ul style="list-style-type: none"> • Policy • RO agreements • Communication and instructions • Monitoring mechanism and oversight programme • Resources • Evaluation and review | Auditor(s) [to be determined] [Member State representatives/ bodies] | | Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc. | Off-site |
| 15 min | Break | | | | |
| 60 min | Surveyor training and recruitment <ul style="list-style-type: none"> • Process of recruitment of flag State surveyors and port State control officers (PSCOs) • Qualification, training and continual improvement | Auditor(s) [to be determined] [Member State representatives/ bodies] | | Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc. | Off-site |
| 120 min | Half day break Debriefing and private meeting | All auditors | | | |

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|-----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|
| <p>120 min (with intermediate break of 15 min)</p> | <p>Implementation of survey, policies for flag State inspections and surveys:</p> <ul style="list-style-type: none"> • Policy on survey and inspection • Type of surveys • Exemption policies • FSI instructions • Certificate Forms • Survey/inspection checklist • IMO guidance • Enforcement of ships, owners, operators (examples) • Statistical analysis • Records • Reporting to IMO • Evaluation and review | <p>Auditor(s)</p> <p>[Member State representatives/bodies]</p> | | <p>Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation</p> <p>Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc.</p> | <p>Off-site</p> |
| <p>End of day 4</p> | <p>Debriefing and private meeting</p> | <p>All auditors</p> | | | |

| Day 5 – Morning session - Flag State activities (Cont.) | | | | | |
|---------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Duration | Activity | Participants | State entity and Location | Remarks on method of auditing | Interaction (Off-site/On-site/Hybrid) |
| 120 min (with intermediate break of 15 min) | Casualty Investigation | Auditor(s) [to be determined] [Member State representatives/bodies] | | Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc. | Off-site |
| 120 min | Half day break Debriefing and private meeting | All auditors | | | |
| Day 5 – Afternoon session - Port State activities | | | | | |
| 120 min (with intermediate break of 15 min) | Implementation of PSC policies: <ul style="list-style-type: none"> • PSC legislation • Practical implementation • PSC officers (PSCOs) • Statistical analysis • Records • Reporting on detention • Evaluation and review | Auditor(s) [to be determined] [Member State representatives/bodies] | | Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc. | Off-site |
| End of day 5 | Debriefing and private meeting | All auditors | | | |

| Day 6 - Port State activities (Cont.) | | | | | |
|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| Duration | Activity | Participants | State entity and Location | Remarks on method of auditing | Interaction (Off-site/On-site/Hybrid) |
| 120 min (with intermediate break of 15 min) | Port State activities, including: <ul style="list-style-type: none"> • Provision of port reception facilities • Handling of dangerous goods (e.g., IMDG, IMSBC, IBC, Grain Codes) • Register of fuel oil suppliers • Operational pollution response (port areas) • Coordination • Evaluation, review, and improvement • Reporting to IMO | Auditor(s) [to be determined] [Member State representatives/bodies] | | Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc. | Off-site |
| 120 min | Half day break Debriefing and private meeting | All auditors | | | |
| 120 min (with intermediate break of 15 min) | Site visit Port State activities - verification of operational aspects: <ul style="list-style-type: none"> • Provision of port reception facilities • Handling of dangerous goods • Operational pollution response (port areas) • Coordination, training, drills | Auditor(s) [to be determined] [Member State representatives/bodies] | Field office (as applicable) | Video call (live streaming): Conducting interviews Guided site visit | On-site/Off-site/Hybrid |
| End of day 6 | Debriefing and private meeting | All auditors | | | |

| Day 7 – Coastal State activities | | | | | |
|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| Duration | Activity | Participants | State entity and Location | Remarks on method of auditing | Interaction (Off-site/On-site/Hybrid) |
| 150 min (with two intermediate breaks of 15 min. each) | Coastal State activities (SOLAS Ch. IV and V; COLREG) - Review of the policies for implementation: <ul style="list-style-type: none"> • Meteorological data and services • Radiocommunication services • SAR coordination and services • Safety of navigation (VTS, AIS, navigational warnings), including training policies for VTS • Communication to IMO • Records • Evaluation and review | Auditor(s) [to be determined] [Member State representatives/ bodies] | | Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc. | Off-site |
| 120 min | Half day break Debriefing and private meeting | All auditors | | | |
| 150 min (with two intermediate breaks of 15 min. each) | Coastal State activities - Review of the policies for implementation: <ul style="list-style-type: none"> • Aids to navigation • Hydrographic services • Operational pollution response and enforcement (Coastal operations) • Records • Evaluation and review | Auditor(s) [to be determined] [Member State representatives/ bodies] | | Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc. | Off-site |
| End of day 7 | Debriefing and private meeting | All auditors | | | |

| Day 8 – Morning session - Coastal State activities (Cont.) | | | | | |
|-------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------|
| Duration | Activity | Participants | State entity and Location | Remarks on method of auditing | Interaction (Off-site/On-site/Hybrid) |
| [150 min] (with two intermediate breaks of 15 min. each) | Site visit Coastal State activities - verification of operational aspects: <ul style="list-style-type: none"> • Radiocommunication services and navigational warning • SAR coordination centre • Safety of navigation services (VTS) • Aids to Navigation • Hydrographic services • Operational pollution response and enforcement (coastal response) | Auditor(s) [to be determined] [Member State representatives/bodies] | Field office (as applicable) | Video call (live streaming): Conducting interviews Guided site visit | On-site/Off-site/Hybrid |
| 120 min | Half day break Debriefing and private meeting | All auditors | | | |
| 120 min | Any outstanding issues | | | | |

| Day 9 and 10 | | | | | |
|------------------|-----------------------------------------------------------------------------------------------|--------------|---------------------------|----------------------------------|---------------------------------------|
| Duration | Activity | Participants | State entity and Location | Remarks on method of auditing | Interaction (Off-site/On-site/Hybrid) |
| Two working days | Drafting of findings, observations and consolidation of the draft audit interim report (DIR). | All auditors | | MSA Module in GISIS, Video calls | Off-site |

| Day 11 | | | | | |
|----------|------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Duration | Activity | Participants | State entity and Location | Remarks on method of auditing | Interaction (Off-site/On-site/Hybrid) |
| 90 min | Closing Meeting Submission of draft interim report including findings and observations, and draft executive summary report. | All auditors [Member State representatives/bodies] | | Video call: Presentation of the draft audit interim report, and next steps. Virtual live auditee participation and presentation. | Off-site |

ANNEX 5

**INDICATIVE SCHEDULE FOR THE CONDUCT OF REMOTE AUDITS OF
MEMBER STATES SCHEDULED TO BE AUDITED IN 2021**

| NO. | MEMBER STATE | Audit period | Remark | Feedback received | Possible period for remote audit (tbc) |
|------------|---------------------------------------|---------------------|--------------------------------------|--------------------------------------------------------------------------------------------|-----------------------------------------------|
| 91 | Saudi Arabia | April | Postponed | Ready for remote audit | September 2021 |
| 101 | Malawi | June | Postponed | No feedback provided | - |
| 102 | Maldives | March | Postponed | Ready for remote audit | January/February 2022 |
| 103 | Mauritius | February | Audited/Reports being finalized | - | - |
| 104 | Benin | March | Postponed | No feedback provided | - |
| 105 | Cameroon | March | Postponed | Ready for remote audit | February/March 2022 |
| 106 | Pakistan | March | Postponed | No feedback provided | - |
| 107 | Republic of Moldova | October | Postponed | Ready for remote audit | October/November 2021 |
| 108 | Dominican Republic | April | Postponed | Ready for remote audit (for those aspects where remote view of facilities is not required) | January 2022 |
| 109 | Ethiopia | December | Postponed | No feedback provided | - |
| 110 | Namibia | April | Postponed | Ready for remote audit (no electronic access to records) | April/May 2022 |
| 111 | Democratic People's Republic of Korea | May | Postponed | Does not accept remote audit | - |
| 112 | Timor-Leste | | Postponed based on decision of C 121 | - | - |
| 113 | Denmark | September | Postponed | Ready for remote audit | October/November 2021 |
| 114 | Cyprus | October | Postponed | Ready for remote audit | January 2022 |

| | | | | | |
|-----|-------------------|-----------|-----------|----------------------------------------------------------------------------------------|------------------------|
| 115 | United Kingdom | September | Postponed | Ready for remote audit | September 2021 |
| 116 | Spain | August | Postponed | Ready for remote audit | September 2021 |
| 117 | Marshall Islands | August | Postponed | Ready for remote audit | January 2022 |
| 118 | Sweden | June | Postponed | Ready for remote audit | September/October 2021 |
| 119 | Japan | September | Postponed | Ready for remote audit (but strongly prefers on-site audit) | March/April 2022 |
| 120 | Liberia | November | Postponed | Ready for remote audit (with requested adjustment of scope due to availability of ICT) | February/March 2022 |
| 121 | Chile | November | Postponed | Ready for remote audit (with specific preferences for the audit process) | February/March 2022 |
| 122 | Republic of Korea | July | Postponed | Ready for remote audit | September 2021 |
| 123 | Greece | December | Postponed | Ready for remote audit (with practical arrangements to be made well in advance) | March/April 2022 |
| 124 | Canada | June | Postponed | Ready for remote audit | October/November 2021 |
| 125 | New Zealand | October | Postponed | Ready for remote audit | October/November 2021 |