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COMMISSION STAFF WORKING DOCUMENT

**Union submission to the 104th session of the International Maritime Organization's
Maritime Safety Committee proposing a new output on guidelines for remote
inspections and verifications in the field of maritime security**

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PURPOSE

This Staff Working Document contains a draft Union submission to the International Maritime Organization's (IMO) 104th session of the Maritime Safety Committee (MSC 104). The IMO has indicatively scheduled MSC 104 from 4 to 8 October 2021.

The draft submission proposes a new output for guidelines for remote maritime security inspections and verifications. The International Ship and Port Facility Security¹ (ISPS Code) requires Authorities to verify and certify certain aspects of ships' security measures. Port facilities also need to comply with ISPS Code requirements, which Designated Authorities need to ensure. While the ISPS Code covers supervising the certification and verification, it does not include provisions on conducting them remotely.

COVID-19 has catalysed a change in interactions in ports. Remote communication tools have become the solution whenever physical presence was not considered strictly necessary.

The pandemic and the changes it induced have also had an impact on maritime security statutory certification activity. Governments took measures to extend their certificates without physical verification, however, these extensions had a maximum validity and interim measures needed to be taken to comply with the requirements of SOLAS² Chapter XI-2 and the ISPS Code.

The draft submission details that for maritime security, there are substantial advantages to introducing the possibility to carry out remote verifications on ships. These allow for preparations for the inspection and review of documents to be done offsite, for instance in the office, also reducing the overall hours spent on the ship. It could also lead to reducing costs for inspections.

However, some aspects of introducing such practice will require careful consideration, so that their establishment provides an equal level of satisfaction in the Maritime Administrations or Designated Authorities. As remote verifications are already being carried out due to COVID-19, harmonisation is urgently needed to ensure a level playing field.

The draft Union submission therefore proposes that the Maritime Safety Committee consider a new output for guidelines on remote maritime security inspections and verifications.

EU COMPETENCE

The matter of maritime security verifications and inspections is covered by Regulation (EC) No 725/2004 on enhancing ship and port facility security³. It is detailed in its Article 9.1 on 'Implementation and conformity checking' and for ships in Annex II, paragraph 19.1 on 'Verifications for ships'; and for port facilities in its

¹ International Ship and Port Facility Security, International Maritime Organization, 2002

² Safety of Life at Sea Convention (SOLAS), International Maritime Organization, 1974/1988

³ Regulation (EC) No 725/2004 of the European Parliament and of the Council of 31 March 2004 on enhancing ship and port facility security; OJ L 129, 29.4.2004, p. 6–91

Article 3.6 “Joint measures and scope” and in Annex II in paragraphs 15.4 on port facility security assessments, 16.1 and 16.2 on port facility plans.

Article 9.1 states:

“Member States shall carry out the administrative and control tasks required pursuant to the provisions of the special measures to enhance maritime security of the SOLAS Convention and of the ISPS Code. They shall ensure that all necessary means are allocated and effectively provided for the implementation of the provisions of this Regulation.”

Annex II, paragraph 19.1 states:

“19.1.1 Each ship to which this Part of the Code applies shall be subject to the verifications specified below:

- .1 an initial verification before the ship is put in service or before the certificate required under section 19.2 is issued for the first time, which shall include a complete verification of its security system and any associated security equipment covered by the relevant provisions of chapter XI-2, of this Part of the Code and of the approved ship security plan. This verification shall ensure that the security system and any associated security equipment of the ship fully complies with the applicable requirements of chapter XI-2 and this Part of the Code, is in satisfactory condition and fit for the service for which the ship is intended;
 - .2 a renewal verification at intervals specified by the Administration, but not exceeding five years, except where section 19.3 is applicable. This verification shall ensure that the security system and any associated security equipment of the ship fully complies with the applicable requirements of chapter XI-2, this Part of the Code and the approved ship security plan, is in satisfactory condition and fit for the service for which the ship is intended;
 - .3 at least one intermediate verification. If only one intermediate verification is carried out it shall take place between the second and third anniversary date of the certificate as defined in regulation I/2(n). The intermediate verification shall include inspection of the security system and any associated security equipment of the ship to ensure that it remains satisfactory for the service for which the ship is intended. Such intermediate verification shall be endorsed on the certificate;
 - .4 any additional verifications as determined by the Administration.
- 19.1.2 the verifications of ships shall be carried out by officers of the Administration. The Administration may, however, entrust the verifications to a recognised security organisation referred to in regulation XI-2/1.
- 19.1.3 In every case, the Administration concerned shall fully guarantee the completeness and efficiency of the verification and shall undertake to ensure the necessary arrangements to satisfy this obligation.
- 19.1.4 The security system and any associated security equipment of the ship after verification shall be maintained to conform with the provisions of regulations XI-2/4.2 and XI-2/6, of this Part of the Code and of the approved ship security plan. After any verification under section 19.1.1 has been completed, no changes shall be made in the security system and in any associated security equipment or the approved ship security plan without the sanction of the Administration.”

Article 3.6 states:

“Notwithstanding the provisions of paragraph 15.4 of Part A of the ISPS Code, the periodic review of the port facility security assessments provided for in paragraph 1.16 of Part B of the ISPS Code shall be carried out at the latest five years after the assessments were carried out or last reviewed.”

Annex II, paragraph 15.4 states:

“The port facility security assessments shall periodically be reviewed and updated, taking account of changing threats and/or minor changes in the port facility, and shall always be reviewed and updated when major changes to the port facility take place.”

Annex II, paragraph 16.1 states:

“A port facility security plan shall be developed and maintained, on the basis of a port facility security assessment for each port facility, adequate for the ship/port interface. The plan shall make provisions for the three security levels, as defined in this Part of the Code.

16.1.1 Subject to the provisions of section 16.2, a recognised security organisation may prepare the port facility security plan of a specific port facility.”

Annex II, paragraph 16.2 states:

“The port facility security plan shall be approved by the Contracting Government in whose territory the port facility is located.”

In light of all of the above, the present draft Union submission falls under EU exclusive competence.⁴ This Staff Working Document is presented to establish an EU position on the matter and to transmit the document to the IMO prior to the required deadline of 2 July 2021.⁵

⁴ An EU position under Article 218(9) TFEU is to be established in due time should the IMO Maritime Safety Committee eventually be called upon to adopt an act having legal effects as regards the subject matter of the said draft Union submission. The concept of ‘*acts having legal effects*’ includes acts that have legal effects by virtue of the rules of international law governing the body in question. It also includes instruments that do not have a binding effect under international law, but that are ‘*capable of decisively influencing the content of the legislation adopted by the EU legislature*’ (Case C-399/12 Germany v Council (OIV), ECLI:EU:C:2014:2258, paragraphs 61-64).

⁵ The submission of proposals or information papers to the IMO, on issues falling under external exclusive EU competence, are acts of external representation. Such submissions are to be made by an EU actor who can represent the Union externally under the Treaty, which for non-CFSP (Common Foreign and Security Policy) issues is the Commission or the EU Delegation in accordance with Article 17(1) TEU and Article 221 TFEU. IMO internal rules make such an arrangement absolutely possible as regards existing agenda and work programme items. This way of proceeding is in line with the General Arrangements for EU statements in multilateral organisations endorsed by COREPER on 24 October 2011.

WORK PROGRAMME

Proposal for a new output on guidelines for remote inspections and verifications in the field of maritime security

Submitted by the European Commission on behalf of the European Union

SUMMARY

Executive summary: This document suggests that a new item be added to the work programme of the Implementation of IMO Instruments Subcommittee (III), to allow technical discussions in view of issuing guidelines for remote inspections and verifications in the field of maritime security.

Strategic direction, if applicable: 1, 2, 5 and 6

Output: Not applicable

Action to be taken: Paragraph 30

Related documents: MSC 102/22/11, MSC 102/24, Circular Letter No.4204/Add.6, IMO Circular Letter No.4204/Add.16, Circular Letter No.4204/Add.19/Rev.2, SOLAS/CONF.5/32, A.1118(30), A.1111(30), III 7/INF.30

Introduction

1 During MSC 102 the Committee recalled Circular Letter No.4204/Add.19/Rev.2 on *Guidance for flag States regarding surveys and renewals of certificates during the COVID-19 pandemic*, which contains guiding principles for the provision of technical and implementation advice to flag States when considering whether to permit statutory certificate extensions beyond 3 months. The Committee considered document MSC 102/22/11 (Republic of Korea), proposing that guidance on the implementation of remote surveys be developed for safety related inspections, taking into account that the lack of uniform guidance on the matter may not only be burdensome to shipowners and ship crew, but may also undermine the credibility of survey quality and the fairness among stakeholders.

2 The Committee noted the sponsor's view that the use of remote surveys will continue to increase in the years ahead, even after the pandemic ends. The Committee, recognising that developing such guidance would require detailed technical consideration by experts, which should also include matters related to cases of force majeure, invited interested Member States and international organizations to submit a new output proposal to the Committee (MSC 102/24 paragraph 22.20), in accordance with the Committees' method of work (MSC-MEPC.1/Circ.5/Rev.1).

Background

3 The International Code for the Security of Ships and of Port Facilities, adopted by Diplomatic Conference in London in December 2002, contains the requirements for ships and for port facilities at the level of ship and port including:

.1 The provisions for ship verification and certification in accordance with ISPS/Part A Sec 19 by the Administration, and

.2 The provisions for the Designated Authority (DA) to exercise control and compliance measures (ISPS Sec B/1.6) to ensure that their port facilities comply with the requirements of the ISPS Code, including the possible issuance of statements of compliance (ISPS Part B para 16).

4 Although the supervision of these activities is covered by the ISPS Code, remote verifications and inspections are not contemplated therein.

IMO's objectives

5 This proposal for a new output to issue guidelines for remote inspections and verifications in the field of Maritime Security lies within the mission statement of IMO to promote safe, secure and environmentally sound, efficient and sustainable shipping.

6 This submission is also consistent with IMO's strategic direction (SD) 1 aiming at the effective, efficient and consistent implementation and enforcement of the provisions of the IMO instruments; with strategic direction (SD) 2 aiming at integrating and advancing technologies in the regulatory framework; with strategic direction (SD) 5 aiming at enhancing facilitation and security of international trade; and with strategic direction (SD) 6 which aims to ensure that a universally adopted, effective, international regulatory framework is in place and implemented consistently, embracing and integrating new and advancing technologies, without causing unnecessary burdens.

Need

7 COVID-19 has catalysed a change in business interaction. Remote communication tools have become the solution whenever physical presence was not considered strictly necessary, including beyond the three-month extension as provided for in IMO Circular Letter No.4204/Add.6.

8 The IMO supported industry-developed 'Covid-19-related guidelines for ensuring a safe shipboard interface between ship and shore-based personnel' (IMO Circular Letter

No.4204/Add.16) indicating that one safety control measure to reduce risk could be to conduct audits, surveys, inspections and training remotely.

9 Several flag State administrations accepted remote verifications instead of on-board surveys, whenever the Recognised Security Organization (RSO) or the Company proposed that said survey could be carried out remotely. However, to date, there are no provisions or common procedures agreed at international level for the execution of class and statutory surveys by remote means, i.e. without attendance by inspectors(s) and that include remote verifications and inspections in the field of maritime security.

10 At a similar level, digitalisation is increasingly one of the pillars of business and regulatory interaction. Consequently, stakeholders and notably SOLAS Contracting Governments maritime administrations are now contemplating alternative solutions to carry out tasks such as “remote inspections/surveys” not only to address these exceptional circumstances, but also as an option in the future for full or partial verification. Such new practices may assist in reducing waiting time at port due to an increase of digitalisation, hence reducing the carbon footprint and reducing crew fatigue when the ship calls in and needs to deal with multiple administrative requirements, including statutory inspections/verifications.

Analysis of the issue

11 In recent months, all industrial sectors have been facing substantial changes in the way they conduct business, which in turn are deeply affecting the maritime sector. Situations such as shortage of personnel, travel limitations, quarantines, lay-ups or closing of ports and port facilities have generated limitations to the physical access of ships or ports and port facilities and to perform the necessary activities as usual.

12 The above has also had an impact on maritime security statutory certification activity. SOLAS contracting governments took measures to extend their certificates without physical verification, however, these extensions had a maximum validity and interim measures needed to be taken to comply with the requirements of SOLAS Chapter XI-2 and the ISPS Code.

13 However, the introduction of such practice has some aspects that will require careful consideration, so that their establishment provides an equal level of satisfaction in the Maritime Administrations or Designated Authorities, as applicable. In this regard:

- .1 inspectors will need to be granted remote access to Company procedures and manuals;
- .2 a stable and secure network will need to be established to allow for continuous, secure and clear audio-visual communication;
- .3 non-verbal communication could suffer, possibly depriving the inspector/auditor of important elements of information necessary to lead the inspection and identify potential findings;
- .4 the inspectors may need additional training to be able to do the job satisfactorily; and
- .5 remote verifications require full engagement of the Company and the ship with the Administration, or with the port facility and the inspector of a port facility, considering that a full remote inspection/verification is an exercise in mutual trust between the maritime administration and the Company and its ship, due to the obvious limitation of not having a physical access to the ship.

14 Document MSC 102/22/11 provides an Annex, which encompasses maritime security. It is the European Union's view that inspections and verifications, as provided for in different SOLAS Chapters, may well require a physical visit to the ship, but the amount of time allocated for such visit depends upon many factors. In the case of a ship's verifications the surveyor or auditor may require to visit more spaces on board, which may be related to other parameters such as the age of the ship and the historical performance of the ship or the Company.

15 It is also noted that in relation to maritime security the necessary verifications will particularly focus on the revision of documentary evidence and interviews, leaving the actual physical inspection as an important complement of the inspection activity that may not be as complicated as other inspection tasks. In this regard, the implementation of remote verifications of ships seem to be more achievable than other inspections (e.g. surveys).

16 Furthermore, voluntary inspections to port facilities may follow the same pattern as ship verifications and therefore will also benefit from remote inspections. Considering that there are many countries with a large number of port facilities and a shortage of Inspectors from their Designated Authority, remote inspections may optimise the control processes. In this case, the Designated Authority will define the scope of the port facility verifications.

17 Upon analysis of the need to amend SOLAS, the ISPS Code or any mandatory instrument it was concluded that for the field of maritime security it is sufficient to develop guidelines dealing with remote verifications on ships and remote inspections on port facilities. With such guidelines, it will be up to the Administration to accept a remote verification approach and set additional conditions to do so, when needed.

18 The approach to this inspection activity by means of verification, using audit techniques and control measures, may be relevant when considering remote techniques for other forms of maritime surveys, inspections and verifications.

Industry standards

19 There are no provisions or common procedures agreed for the partial or complete execution of statutory verifications/inspections by remote means, i.e. without attendance by inspectors/auditors.

20 Notwithstanding the above, there are land industry standard/documents related to remote audits that may be useful in this regard such as ISO 19011: 2018 Guidelines for auditing management systems.

Analysis of implications

21 It is considered that this proposal will not incur any additional administrative requirements or burdens. There will be no need for a new Convention or an amendment to an existing one.

22 In this regard, the completed administrative checklist, as set out in annex 5 to MSC-MEPC.1/Circ.5/Rev.1, is set out in Annex 1.

Benefits

23 In the maritime security context, there are substantial advantages in the introduction of the possibility to carry out remote verifications on ships in accordance with ISPS Code A/19 and remote inspections on Port Facilities such as:

- .1 preparation for the inspection may be done at the office and the review of documentation may be done offsite;

.2 reduction of the number of hours spent on board by either inspectors, officers of the Administrations or auditors that might facilitate the operation of the ship;

.3 the inspection/verification process may be more effective, meaning that only the minimum required personnel will be requested to be interviewed and to provide evidence;

.4 depending on the circumstances, it may contribute to reducing stress in the crews and therefore to reducing fatigue if carried out at sea;

.5 the effectiveness of the e-communication channels between the ship and the Company could be enhanced; and

.6 it has the potential to reduce inspection costs due to the reduction in trips to the ship or port facility to be inspected.

24 This proposal could be done at minimal cost to the maritime industry and may have the benefits of reducing expenses and optimising resources without increasing maritime security risks. The guidelines will ensure provision of information to enable assessment and verification of ship and port security without limiting the possibility to carry out on-site verifications and inspections as deemed appropriate by the Administration.

Output

25 It is recommended that the new item be added to the work programme of the Implementation of IMO Instruments Subcommittee (III), with two sessions needed for completion for the 2022-2023 biennium.

26 The principles for such guidelines are set out in Annex 3.

Human element

27 The completed checklist contained in MSC-MEPC.7/Circ.1 is set out in Annex 2.

Urgency

28 The need to enable remote verifications and inspections on ship and port facility security in practical situations, either in case of emergency or other circumstances where considered appropriate by the Administration, as soon as possible and practicable. This is key due to the fact that these remote verifications are already being carried out due to COVID-19 and harmonisation is urgently needed to ensure a level playing field.

29 It is recommended that the new output be included in the biennial agenda for the Sub-Committee on Implementation of IMO Instruments, to enable proposals to be submitted to the eighth session of the Sub-Committee. This work should be completed within two sessions.

Action requested of the Committee

30 The Committee is invited to consider the above proposal and take action, as appropriate.

ANNEX 1

CHECKLIST FOR IDENTIFYING ADMINISTRATIVE REQUIREMENTS

<p>This checklist should be used when preparing the analysis of implications required in submissions of proposals for inclusion of outputs. For the purpose of this analysis, the term "administrative requirements" is defined in resolution A.1043(27), i.e. administrative requirements are an obligation arising from future IMO mandatory instruments to provide or retain information or data.</p> <p>Instructions:</p> <p>(A) If the answer to any of the questions below is YES, the Contracting Government proposing an output should provide supporting details on whether the requirements are likely to involve start-up and/or ongoing costs. The Contracting Government should also give a brief description of the requirement and, if possible, provide recommendations for further work (e.g. would it be possible to combine the activity with an existing requirement?).</p> <p>(B) If the proposal for the output does not contain such an activity, answer NR (Not required).</p> <p>(C) For any administrative requirement, full consideration should be given to electronic means of fulfilling the requirement in order to alleviate administrative burdens.</p>		
<p>1. Notification and reporting? Reporting certain events before or after the event has taken place, e.g. notification of voyage, statistical reporting for IMO Members</p>	<p>NR x</p>	<p>Yes <input type="checkbox"/> Start Up <input type="checkbox"/> On Going</p>
<p>Description of administrative requirement(s) and method of fulfilling it: (if the answer is yes)</p>		
<p>2. Record keeping? Keeping statutory documents up to date, e.g. records of accidents, records of cargo, records of inspections, records of education.</p>	<p>NR x</p>	<p>Yes <input type="checkbox"/> Start Up <input type="checkbox"/> On Going</p>
<p>Description of administrative requirement(s) and method of fulfilling it:(if the answer is yes)</p>		
<p>The existing record keeping is anticipated to continue. The proposal to encourage facilitating reporting results from inspections carried out by non-governmental entities seeks to mitigate any additional burden on Administrations.</p>		
<p>3. Publication and documentation? Producing documents for third parties, e.g. warning signs, registration displays, publication of results of testing</p>	<p>NR x</p>	<p>Yes <input type="checkbox"/> Start Up <input type="checkbox"/> On Going</p>
<p>Description of administrative requirement(s) and method of fulfilling it (if the answer is yes)</p>		
<p>4. Permits or applications? Applying for and maintaining permission to operate, e.g. certificates, classification society costs</p>	<p>NR x</p>	<p>Yes <input type="checkbox"/> Start Up <input type="checkbox"/> On Going</p>
<p>Description of administrative requirement(s) and method of fulfilling it:(if the answer is yes)</p>		
<p>5. Other identified requirements?</p>	<p>NR x</p>	<p>Yes <input type="checkbox"/> Start Up <input type="checkbox"/> On Going</p>

ANNEX 2

CHECKLIST FOR CONSIDERING HUMAN ELEMENT ISSUES BY IMO BODIES

Instructions:			
If the answer to any of the questions below is:			
(A) YES, the preparing body should provide supporting details and/or recommendation for further work.			
(B) NO, the preparing body should make proper justification as to why human element issues were not considered.			
(C) NA (Not Applicable), the preparing body should make proper justification as to why human element issues were not considered applicable.			
Subject Being Assessed: (e.g. Resolution, Instrument, Circular being considered)			
New unplanned output to consider when and how remote surveys could be conducted			
Responsible Body: (e.g. Committee, Sub-committee, Working Group, Correspondence Group, Member State)			
Maritime Safety Committee and the Sub-Committee for on Implementation of IMO Instruments (III)			
1. Was the human element considered during development or amendment process related to this subject?	Yes	No	NA ✓
2. Has input from seafarers or their proxies been solicited?	Yes	No	NA ✓
3. Are the solutions proposed for the subject in agreement with existing instruments? (Identify instruments considered in comments section)	Yes	No	NA ✓
4. Have human element solutions been made as an alternative and/or in conjunction with technical solutions?	Yes	No	NA ✓
5. Has human element guidance on the application and/or implementation of the proposed solution been provided for the following:	Yes	No	NA ✓
• Administrations?	Yes	No	NA ✓
• Ship owners/managers?	Yes	No	NA ✓
• Seafarers?	Yes	No	NA ✓
• Surveyors?	Yes	No	NA ✓
6. At some point, before final adoption, has the solution been reviewed or considered by a relevant IMO body with relevant human element expertise?	Yes	No	NA ✓
7. Does the solution address safeguards to avoid single person errors?	Yes	No	NA ✓
8. Does the solution address safeguards to avoid organizational errors?	Yes	No	NA ✓
9. If the proposal is to be directed at seafarers, is the information in a form that can be presented to and is easily understood by the seafarer?	Yes	No	NA ✓
10. Have human element experts been consulted in development of the solution?	Yes	No	NA ✓

11. HUMAN ELEMENT: Has the proposal been assessed against each of the factors below?			
<input type="checkbox"/> CREWING. The number of qualified personnel required and available to safely operate, maintain, support, and provide training for system.	Yes	No	NA ✓
<input type="checkbox"/> PERSONNEL. The necessary knowledge, skills, abilities, and experience levels that are needed to properly perform job tasks.	Yes	No	NA ✓
<input type="checkbox"/> TRAINING. The process and tools by which personnel acquire or improve the necessary knowledge, skills, and abilities to achieve desired job/task performance	Yes	No	NA ✓
<input type="checkbox"/> OCCUPATIONAL HEALTH AND SAFETY. The management systems, programmes, procedures, policies, training, documentation, equipment, etc. to properly manage risks.	Yes	No	NA ✓
<input type="checkbox"/> WORKING ENVIRONMENT. Conditions that are necessary to sustain the safety, health, and comfort of those on working on board, such as noise, vibration, lighting, climate, and other factors that affect crew endurance, fatigue, alertness and morale.	Yes	No	NA ✓
<input type="checkbox"/> HUMAN SURVIVABILITY. System features that reduce the risk of illness, injury, or death in a catastrophic event such as fire, explosion, spill, collision, flooding, or intentional attack. The assessment should consider desired human performance in emergency situations for detection, response, evacuation, survival and rescue and the interface with emergency procedures, systems, facilities and equipment.	Yes	No	NA ✓
<input type="checkbox"/> HUMAN FACTORS ENGINEERING. Human-system interface to be consistent with the physical, cognitive, and sensory abilities of the user population.	Yes	No	NA ✓

ANNEX 3

Principles of the Guidelines for remote verifications on ships and inspections of Port Facilities in the field of Maritime Security

1. Remote activities should not impact on other IMO instruments related to maritime security. Should any instrument be identified, the guidelines will refer to it for clarification or amendment.
2. A Goal Based Approach, following the functional requirements of the ISPS Code may be used.
3. Remote audit principles, as established in industry standards, may be applied in the development of the guidelines.
4. Two different approaches may be considered, when necessary, for either ship verification by the Maritime Administration or port facility inspection by the Designated Authority.
5. Remote verification or inspection will be requested by the Company, which will provide all necessary means for the verification/inspection to be carried out.
6. In order to grant a remote verification on a ship or an inspection on a port facility, a risk-based approach should be applied by the Maritime Administration or the Designated Authority.
7. The approval for a remote inspection requested by the Company or the port facility security officer will be issued by the Maritime Administration, the Designated Authority or the RSO acting on their behalf if authorised to do so. The Maritime Administration should establish the necessary conditions for approval and authorisation.
8. Confidentiality needs to be ensured regarding the documents needed for these inspections/verifications, such as the ship security plan and port facility security plan.
9. The result of a successful remote verification on a ship or port facility inspection should lead to a level of satisfaction to ensure certification/approval or alternatively might require completion with a physical visit to the ship.
10. The use of a remote verification of a ship or remote inspection of a port facility should not preclude the need to inspect the ship or site before completion.
11. Since the inspectors will not have access to the ship on the spot and direct visualisation is substituted by images provided via filming or a video using mobile devices, the inspectors could be limited in getting a full picture of the ship and therefore gaining full knowledge of the degree of implementation of legislation. However, it would be necessary to carry out the interviews and revision of documentation via audio or video conference.
12. In case of certification after a successful verification, it is necessary to ensure that the level of satisfaction, as indicated above, remains the same.
13. Digital signatures and electronic certificates would be of the utmost importance in the certification process, where needed.