

CIRCULAR NO. 76

PORTUGUESE MARITIME ADMINISTRATION

SUBJECT | Portuguese Policy on Remote Surveys for Recognized Organizations and Recognized Security Organizations.

To | Recognized Organizations, Shipowners, Companies and Operators

DISCLAIMER | This document is for information only and is not intended to interpret or replace the legal referenced documents published by official sources

REFERENCES | IACS UR Z29, Remote Classification Surveys, Mar 2022.
European Maritime Safety Report 2022 (EMSA).
IMO Sub-Committee on Implementation of IMO Instruments, 8th Session (IMO III 8).
IACS Rec. 98, Duties of Surveyors under Statutory Conventions and Codes.

1. OBJECTIVE

The aim of this Circular is to provide guidance to the Recognized Organizations, Shipowners, Companies, and operators, on the acceptance and allowance of Remote Surveys conducted on board Portuguese flagged vessels.

2. INTRODUCTION

Until the COVID-19 pandemic, surveys and audits performed without the physical attendance of a surveyor have been almost limited to extraordinary cases for postponement of surveys or audits, when permitted by the conventions and codes, to cases where the scope did not require any substantial on-site verification or to administrative tasks not requiring a survey decision.

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During the COVID-19 pandemic, exceptional and temporary measures related to the epidemiological situation were adopted by the Governments of the various countries, leading to constraints in the normal development of maritime transport activity in several Countries. Several Administrations including Portuguese Maritime Administration have then decided to accept the conduct of remote inspection in lieu of the attendance/verification on board by the Recognized Organizations.

The COVID-19 situation may be considered as the catalyst for a wider use of remote surveys/audits for the near future. Recognizing the relevance of this matter, it becomes imperative to establish guidelines and an understandable framework on which the conduction of remote surveys is accepted by Portuguese Administration.

3. Application

This circular applies to ships registered in the Portuguese Conventional Register and in the International Register of Ships in Madeira. It also revokes the notice for remote inspections during the COVID-19 pandemic of September 1st, 2021.

4. DEFINITIONS

- A “Remote Survey” is a process of verifying that a ship and its equipment are in compliance with applicable statutory regulations where the verification is undertaken, or partially undertaken, without physical attendance on board the ship by a surveyor.
- ‘Attendance on board by a surveyor’ means physical attendance on board the ship by a surveyor.
- Remote classification activities not requiring a survey, such as some administrative tasks, are not to be considered as remote surveys.
- An administrative task is a task where a survey decision is not being made, for example reissue of a certificate or record following a correction, or an update to the ship’s records held by the Classification Society or a document review.



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5. GENERAL

Remote survey will only be appropriate provided the level of assurance is not compromised, and the survey is carried out with the same effectiveness as and is equivalent to, a survey carried out with attendance on board by a surveyor.

The quality of remote surveys and the level of safety, environmental protection and security on board should not be compromised.

The evaluation and acceptance of the condition of the survey item remains under the sole responsibility of the surveyor.

6. ELIGIBILITY OF THE REMOTE SURVEY

A remote survey shall be deemed eligible when it provides the same level of assurance, according to the requirements for equivalency, as if it was conducted with attendance on board by a surveyor.

Eligibility of the remote survey shall be decided based on type and scope of the requested survey in accordance with

Table 1.

The RO must request authorization from the Administration before carrying out such inspections and be given written confirmation of acceptance by the Administration. The authorization is based on the principle of case-by-case analysis.

In addition to the principles specified by the RO for carrying out this type of remote verification, the case-by-case assessment should include:

1. The performance of the ship's safety management company;
2. The scope of remote surveys - consultation with the flag State in the event that the survey has been delegated to an RO;



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3. Technical requirements for the use of remote inspection (use of approved remote inspection techniques, audio and video communication, two-way communication, ...);
4. The potential need for validation through a physically assisted survey or survey at the first opportunity;
5. The functions, responsibility, impartiality and obligation of the parties involved, including personnel involved in the physical inspection on board the ship - the qualifications of personnel involved in the physical inspection on board the ship;
6. The provision of information and evidence to the auditor;
7. Transparency of information on the remote methods used and the status of the ship, indicating whether the surveys were carried out remotely or physically.

In all cases, where it is intended to verify the operation of equipment (clearly identified), RO shall provide the service report (where applicable) and written statement by the Master/Chief of Machinery on the correct functioning of the equipment concerned, to the Administration to seek their authorization.



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Table 1- Eligibility of remote surveys on board Portuguese flagged ships

	Scope of remote survey	Notes
Remotes surveys generally accepted	<ul style="list-style-type: none"> • Survey for verification of condition of equipment¹ clearly identified. • Radio Surveys which have been attended by a radio technician subcontracted by the RO as service supplier or an exclusive radio surveyor. • In-water bottom surveys. • Additional ISM/ISPS/MLC due to rectification of non-conformities or pending remarks². 	<p>(1) Verification of rectification, or postponement, of deficiencies covered under section 4.8.4 of the Survey Guidelines under the harmonized system of survey and certification (HSSC) (resolution A.1156(32));</p> <p>(2) Not applicable in cases of Additional Audits due to PSC detentions.</p>
Remotes surveys generally not accepted ⁴	<ul style="list-style-type: none"> • Verification of condition of critical³ equipment on board. • Damage in structure. • Surveys⁵ for assessment of structural items and/or vessel's hull. • Interim ISM/ISPS/MLC audits. 	<p>(3) Occasional survey for minor hull damage may be deemed as eligible remote survey item</p> <p>(4) Some examples of safety-critical equipment onboard a vessel includes an emergency fire pump, emergency generator, emergency batteries, lifeboat engines, fixed firefighting system, diesel generators, incinerators, and more.</p> <p>(5) In exceptional circumstances, remote surveys, may be acceptable after being analysed by Portuguese maritime Administration.</p>
Remotes surveys never accepted	<ul style="list-style-type: none"> • Periodical statutory surveys (renewal/special surveys, intermediate surveys, annual surveys). • Initial surveys. • Initial and periodical ISM/ISPS/MLC audits. • IHM surveys. 	



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More information

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