
Remote Statutory Surveys, Audits and Inspections

Notice to ship owners, managers, Masters, Approved Nautical Inspectors, Recognised Organisations and surveyors

1. Purpose

- 1.1. This Marine Notice (MN) outlines the requirements of the Bahamas Maritime Authority (BMA) for carrying out remote surveys, audits and verifications by Bahamas Recognised Organisations.
- 1.2. This Notice also describes the minimum authorisation criteria for Bahamian ships to be eligible for remote surveys, audits and verifications.

2. Application

- 2.1. This Notice applies to all Companies¹ and ships subject to remote surveys, audits and verifications by a Bahamas Recognised Organisation.

3. Introduction

- 3.1. The COVID-19 pandemic posed serious challenges to the shipping industry. Remote activities were carried out on a case-by-case basis where in-person attendance was deemed unsafe or impossible due to restrictions imposed by authorities. Since then IACS published UR Z29 and some Classification Societies were in process of developing and implementing the limited use of remote survey for compliance with Rules of Classification requirements. This Marine Notice outlines the Bahamas position on carrying remote surveys, audits and verifications.
- 3.2. Remote survey as defined in paragraph 5.14.1 of International Maritime Organization (IMO) Resolution [A.1186\(33\) 2023 Survey Guidelines under the Harmonized System of Survey and Certification \(HSSC\)](#), is a means of survey that enables examination of a ship's hull structure, machinery components and systems, and ship's equipment and/or gathering information and evidence of compliance with applicable

¹ The Company is the entity responsible for the management of the ship in accordance with the International Safety management code for safe operation ships & for pollution prevention (ISM Code). For ships to which the ISM Code does not apply, the Company is the Managing Owner in accordance with Section 52 of the Merchant Shipping Act.

requirements without the physical attendance on board by the surveyor. In the absence of a surveyor on board, the examination and tests are carried out by a competent crew member² and/or a qualified technician of an approved service supplier under the remote supervision and instructions of the surveyor utilising two-way audio and video communication or other accepted means of communication and to the satisfaction of the surveyor.

- 3.3. Remote ISM audit is an audit carried out for a Company or vessel against the requirements of the ISM code, where the audit/verification is performed without attendance on-site by the auditor, using remote auditing methods³.
- 3.4. Remote ISPS verifications can be defined as activities using audio-visual tools or technologies which allows an auditor to remotely check ship's equipment, records, the security system as well as to interact with the ship's crewmembers including security key figures of the organization on board as necessary as per the requirements of ISPS Code⁴. The verification is carried out for a vessel against the requirements of the ISPS Code without attendance on-site by the auditor.
- 3.5. Remote survey, audit and verification shall be carried out to the same scope and thoroughness as a physical onboard attendance to ensure the condition of the ship, its machinery, equipment and safety management are being maintained in accordance with the relevant requirements.

4. BMA Requirements for remote surveys, audits and verifications

4.1. General

- 4.1.1. The BMA may give authorisation to carry out remote surveys, audits and verification on a case-by-case basis in the event of extraordinary circumstance, such as natural disasters, warfare, pandemic/epidemic outbreak, strike, riot, crime or sudden legal changes, which prevents on-site attendance, or where physical attendance by the Recognised Organisation surveyor may not be possible owing to *force majeure* circumstances. In such cases, BMA may require a follow-up physical attendance at the next possible opportunity.
- 4.1.2. Authorisation for a remote survey may be provided to the Recognised Organisation on a case by case basis, where a survey is required in the event of verification/clearing of minor defects/damage(s) to equipment, issuing a short-term certificate, reinstatement

² See [MN089 for a definition of a competent person](#)

³ Such as those described in ISO 19011:2018, "Guidelines for auditing management systems" and IAF MD 4 "IAF Mandatory document for the use of information and communication technology (ICT) for auditing/assessment purposes"

⁴ The International Ship and Port Facility Security Code

of the full-term certificate, issuance/removal of statutory conditions or when a verification survey is required for an exemption requested as per Marine Notice 08.

- 4.1.3. A survey, an audit or a verification item that requires a substantial check of the condition of the equipment concerned (e.g. lifeboats, their release gear and launching appliances thorough examination, examination of a main fire pump or fixed fire-fighting installation and similar) shall not be considered eligible for a remote verification unless the equipment in question has been physically examined and/or serviced by an approved service provider within the scope of an annual, periodical, or intermediate survey of a parent certificate. Any verification items that cannot be verified remotely should be examined by a physical survey.
- 4.1.4. A remote ISM audit, if authorised, should be limited to the issuance of an interim certificate if applicable, or a certificate with a validity no longer than the time needed for the audit to be performed physically and in any case not exceeding six (6) months, following the guidelines Resolution A.1188(33) 2023 guidelines on implementation of the international safety management (ISM) code by administrations.
- 4.1.5. When a statutory survey is carried out partly remotely and partly through physical attendance, the Recognised Organisation shall ensure that the items surveyed remotely and physically are correctly indicated on the survey report and/or on the relevant certificates.
- 4.2. ***Application for a remote survey***
- 4.2.1. In the absence of established IMO guidance on assessments and application criteria for remote survey, audit and verification the BMA will utilise the following considerations when reviewing remote survey requests from the Recognised Organisation:
- i. Ship type, age and compliance records for both the ship and the ISM Company, including historic PSC performance records;
 - ii. Justification of the extraordinary circumstances making physical attendance impossible;
 - iii. The scope of survey items that are intended to be verified remotely;
 - iv. Recognised Organisation's procedures for remote surveys, audits and verifications;
 - v. Availability of information and communication technology (ICT) and two-way audio/video means of communication ensuring confidentiality and security of information and data protection;
 - vi. The roles and responsibilities of all personnel involved including competent persons involved in physical examinations and tests on board ship.

4.2.2. Application for a remote survey shall be submitted by the Recognised Organisation to BMA via email to tech@bahamasmaritime.com and shall include the details outlined in 4.2.1 above.

4.3. ***Exclusions from remote survey and verification provisions***

4.3.1. The following checks, tests and other types of mandatory verification under the provisions of the international Conventions are excluded from the remote survey scope and shall undergo physical verification on every occasion by the authorised service personnel:

- i. Lifesaving appliances and associated systems and equipment;
- ii. Fire-fighting and fire detection systems;
- iii. Global Maritime Distress and Safety System (GMDSS) radio-communication equipment including Emergency Position Indicating Radio Beacons (EPIRBs);
- iv. Voyage Data Recorder (VDR), S-VDR and associated systems included in the scope of annual performance test, as per Regulation 18.8 of Chapter V of the International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS);
- v. Navigation equipment, as applicable, including Automatic Identification System (AIS) test, as per Regulation 18.9 of Chapter V of SOLAS
- vi. Lifting appliances and anchor handling winches subject to periodical thorough examination, as per Regulation 3-13 of Chapter II-1 of SOLAS.

4.4. For ships subject to Enhanced Survey program (ESP) requirements as per section 1.2.5 of the ESP Code, Annex B Part A, the BMA may support completion of a close-up survey via remote means on a case-by-case basis, subject to Recognised Organisation application. The Recognised Organisation shall ensure that the scope and thoroughness of the proposed remote survey is not inferior to a close-up physical examination by an experienced surveyor.

5. Queries

5.1. Any queries on this Notice may be submitted to tech@bahamasmaritime.com or any BMA office.

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