

PART A

CHAPTER 27

ALTERNATIVE COMPLIANCE SCHEME (INSPECTION)

27.1 Legal Requirements

27.1.1 Ministerial approval was given in 2003 to set up, on a trial basis with Lloyds Register and American Bureau of Shipping, an Alternative Compliance Scheme (ACS), modelled upon schemes already in existence in the USA, as an option to the current UK ship survey system. From June 2005 the trial was extended to all UK recognised classification societies. In March 2010, the Shipping Minister agreed that ACS should continue as a feature of the MCA's survey regime indefinitely. More details are in Part B Chapter 8 of these instructions and MGN 345.

27.1.2 The scheme allows statutory surveys to be carried out by the classification society with the exception of ISM/ISPS/MLC audits. Safe Manning Documents and exemptions shall be issued by the MCA. In addition to the certification required for a non ACS ship, ACS ships are required to hold a Certificate of Inspection (CoI) demonstrating to attending Class surveyors that the ship is in the ACS scheme and that their survey authorisation is consequently extended.

27.2 Definitions

27.2.1 Definitions of terms relating to the Alternative Compliance Scheme and surveys related to the issuance of an ACS Certificate of Inspection are described in MGN 345(M).

27.3 Responsibility

27.3.1 Surveyors

27.3.1.1 The Customer Service Manager is the main MCA focal point for the customer and all plans and documents must be forwarded by the customer to them.

27.3.1.2 An Instrument of Appointment (IoA) will be issued by Survey Operations Branch to the Class surveyor in the case of any flag in or new-building, in order to conduct the flag-in/initial surveys. A list of all the required plans and documents is to be included in the cover fax which is sent with the IoA. The IoA will state that it is intended that the vessel will be enrolled on ACS.

27.3.1.3 Inspections for issue of a CoI must be carried out by MCA surveyors.

27.4 Surveys Required

27.4.1 Ships on the ACS are required to be subjected to the following MCA surveys, audits and inspections, in conjunction with audits for the Safety Management Certificate;-

- an Initial Inspection,
- an Intermediate Re-examination,
- a Renewal Inspection,

27.4.2 Additionally, for new-builds the lead surveyor should visit the shipyard to assess the QA procedures and the class society local office. The visit referred to in 27.4.2 should include a presentation and review of the shipyard facilities and QA department and a visit to the local class site office. For subsequent ships in a series this is not required. This visit can also be omitted if the yard has had a satisfactory visit by MCA in the last five years for ships of the same type. Where there has been a satisfactory yard visit but with a different class society consideration will be given case-by-case as to whether a further visit is required or whether the local class office issues mentioned in 27.5.6 below can be dealt with remotely. Survey Operations Branch maintain a list of yards and local class offices that have been visited; details of any new yards visited should be forwarded to Survey Operations Branch for inclusion.

27.5 Pre- Survey Actions

27.5.1 The following items where applicable shall be checked prior to commencing the inspection

- SIAS
- MCA Survey Files
- Exemption Certificates
- New Legislative requirements
- Class Survey Status (via password protected websites)
- PSC Inspection history

Remarks from previous inspections and outstanding deficiencies must be resolved to the satisfaction of the surveyor before the issue of a renewal Certificate of Inspection, or the intermediate endorsement of an existing certificate. Any overdue or postponed conditions of class must be followed up with the attending class surveyor or in the absence of a class surveyor discussed with Survey Operations Branch.

27.5.2 The surveyor/s should ensure that sufficient time will be available for the inspection and should liaise with owners beforehand, noting that various options may be available such as more time in port, sailing with the ship for suitable short voyages, providing more than one surveyor and so on.

27.5.3 Inspections should only be commenced on receipt of a completed "Application for Survey" form (MSF 5100) and after sufficient fees have been

received; this will normally be in conjunction with the ISM/ISPS/MLC audits/inspection and general inspection, plus additional fees for issue of the Col. Note that no Application for Survey or fees are required for attendance at the sample docking attendances in relation to ACS. Further guidance on fees is described in Part C, Chapter 2 of these instructions.

27.5.4 The relevant Business Support Unit administration team processes the application. CERS/SVD must be interrogated to ensure that the correct ship is on the system; if the vessel is not yet on the system (e.g. newbuild, flag-in), the Administrator (TST) should be contacted, who will check the details and arrange for the vessel to be added to the Single Vessel Database (SVD) if appropriate. A "job control sheet" (MSF 5108) is produced which is then tracked for charter standard purposes. This is then passed to the Manager, or other person nominated by them, who then appoints the Lead Surveyor (LS) for the survey.

27.5.5 The yard visit should:

- check class approvals for shipbuilding QA, welder qualifications, weld procedures and materials control.
- confirm the project manager's understanding of UK requirements, including MED equipment.
- explain the lead surveyor's and CSM's roles and ensure the yard has contact details.

27.5.6 The local class site office visit should:

- confirm local surveyors and managers' understanding of UK requirements, including MED equipment, and that they have access to the relevant country files
- review the surveyor training and experience
- explain the lead surveyor's and CSM's roles and ensure they have contact details.
- discuss with class and shipyard the drawings MCA wish to see

27.6 Items to be surveyed

27.6.1 The inspection is to be carried out using the relevant instructions, guidance notes and HQ advice, which may be found on MLD/SCMS. Surveyors should be mindful of their own health and safety during inspections and take account of all guidance provided by MCA as well as their professional judgement in relation to the prevailing circumstances

27.6.2 Certificate of Inspection requirements are comparable to a very thorough general inspection and comprise two aspects – hardware and operations.

27.6.3 Satisfaction with hardware condition will be ascertained by reference to conditions of class raised against the ship by class surveyors, by PSC history and by direct observation on board.

27.6.4 Satisfaction with operations will be ascertained by ISM audit, PSC history and by observation of activities on board.

27.6.5 There is no aide memoire for ACS inspections.

27.7 Post Survey Actions

27.7.1 Deficiencies

The lead surveyor is responsible for recording and closing out any deficiencies found during the inspection in the SIAS database, in accordance with the requirements of Part C Chapter 4 of these instructions.

27.7.2 Declarations & Certificates

27.7.2.1 The requirements relating to the issue of a certificate are given in MGN 345.

27.7.2.2 On completion of an initial/renewal inspection, the lead surveyor prepares the certificate, following the guidance in Part C Chapter 3 of these instructions

27.7.2.3 An Interim Certificate of Inspection (MSF 1114) can be issued in the following cases: -

.1 To a newbuild – on delivery;

.2 To a ship joining the UK flag – following change of flag survey by Class, including fire and boat drill to attending surveyors satisfaction.

Interim Cols should be valid up to the expiry date of the interim SMC certificate.

27.7.2.4 When satisfactory surveys, audits and inspections have been completed a full term **Certificate of Inspection** (MSF 1115) can be issued valid for up to 5 years. The expiry date should be selected to match the expiry date of the SMC certificate with the same intermediate audit / survey range dates. As with SMC audits, Col survey can be carried out up to 3 months before the expiry of the certificate with new certificate being issued with expiry date 5 years from expiry of the current certificate.

27.7.2.5 Where a ship already on the UK flag wishes to change to ACS the Customer Service Manager may issue a Certificate of Inspection, with validity matching the SMC, based on satisfactory previous MCA surveys, inspections and audits. Should it be considered that an inspection is required prior to the issue of a full term Col, an Interim Certificate of Inspection can be issued, with validity until the next scheduled MCA visit.

Notification to the Classification Society

27.7.2.6 It is the responsibility of the Customer Service Manager (or Lead Surveyor) to inform the relevant Classification Society when an interim or full-term Certificate of Inspection has been issued. Classification Society contact details for this purpose are available on the 'Alternative Compliance Scheme' page of the Survey Operations Branch microsite.

27.7.2.7 Intermediate Inspection Endorsement

27.7.2.7.1 On completion of the intermediate inspection, the certificate should be endorsed accordingly.

27.7.2.7.2 Any endorsements made to the owner's copy of the certificate should also be recorded on the file copy of the certificate (or by adding a photocopy of the endorsement page to the file), and on the electronic version of the form, on return to the office.

27.7.3 Review of Exemptions

Not applicable for ACS.

27.7.4 Documents & Records

27.7.4.1 The table below describes the minimum documents to be completed and filed following a survey.

Item	Record
Record on SIAS?	Yes MSF 1602/3 survey & inspection deficiencies
Place copy on registered file, CM.../48/01	Yes (Interim) Certificate of Inspection MSF 1602/3 forms. Intermediate endorsement Relevant test reports/ results, drawings or photographs Exemptions
Minute required on registered file?	Yes
Report Class Related deficiency to Survey Operations Branch?	Yes MSF 1923

27.8 Fees

27.8.1 The Job Control Sheet must be closed out and sent to the relevant Business Unit so that fee accounts may be balanced and relevant refunds made to the customer.

27.9 Flow Chart

27.9.1 Refer to the table of responsibilities in section 4 of MGN 345.

27.10 Special Instructions and Guidance

27.10.1 Survey, Audit and Inspection Procedure

27.10.1.1 Ships under ACS will need to undergo regular inspection twice every five years, usually in conjunction with the ISM/ISPS audits and general inspection. For a regular inspection the following procedure should be followed:

Hardware

27.10.1.2 Before attending the ship the surveyor should:

- Check classification society records for outstanding conditions of class and class notes/ memoranda through the class password-protected websites (contact Survey Operations Branch for details)
- Examine PSC records using Equasis
- Examine SIAS records for outstanding and overdue deficiencies
- Check MAIB records for accident data.

27.10.1.3 Once on board the opportunity should be taken to:

- Inspect any accessible areas of the ship, especially any spaces not always accessible eg. tanks and holds.
- Inspect any hull or machinery which has recently been surveyed by Class or by ship's staff under approved survey or planned maintenance schemes.
- Carry out an expanded inspection, for those ship types that would require it under the PSC requirements, refer to MSN 1832 and MSIS 38.

Operations

27.10.1.4 The record checks detailed above may also indicate operational weakness.

27.10.1.5 It is the intention that the Col inspection be carried out in conjunction with an ISM audit during which many aspects of operations will be scrutinised, in particular observation of fire and boat drills as part of the objective evidence.

27.10.1.6 If there are any shortfalls identified, or it is more than 3 years since the last thorough inspection by an MCA surveyor, then a more detailed inspection of the vessel should be conducted, as for a PSC inspection.

Docking Inspections

27.10.1.7 In addition to regular inspections, a statistically significant sample of dry dock inspections will be carried out, on a risk model basis developed by Survey Operations Branch, as part of the monitoring of the scheme. Ships on ACS are required to notify MCA of forthcoming surveys of the ships bottom, whether in-water or dry dockings. This information should be reported to the CSM who will pass it to Survey Operations Branch. On receipt of this information Survey Operations Branch will decide whether an MCA docking inspection is appropriate.

27.10.1.8 During the docking survey the following items will be examined:

- The ship's bottom
- Any items of hull or machinery being surveyed by Class
- A general inspection of the ship, with emphasis on those parts not normally accessible / available

27.10.2 Damage

27.10.2.1 The scheme requires the classification societies to report serious Conditions of Class imposed on the ship to the MCA, and the ship must report to MAIB if required by the MS (Accident Reporting and Investigation) Regulations. Following a report of damage the Customer Service Manager / Survey Operations Branch will liaise with the classification society HQ/ surveyor to agree repair recommendations. The MCA will accept the classification society's approval of recommended permanent repairs provided the vessel no longer poses an immediate pollution or navigation safety threat.

27.10.3 Revocation of Certificate of Inspection

27.10.3.1 There are no specific criteria under which a Col will be revoked by MCA, however the guidance in paragraph 6 of MGN 345 should be taken into consideration should it be considered that it is no longer appropriate for the vessel to remain on ACS.

27.11 References

None.

Author	S Ireland	Branch	Survey Operations
Approved by	P Owen	Branch	Survey Operations
Authorised by	T Elder	Branch	Tech Performance