POSITION PAPER

Remote Survey (Revision 0)

IACS
International Association of Classification Societies

Our Position

Consistent with IACS stated objectives on digitalization and innovation, IACS recognizes the rapid advancement of remote survey and verification technologies. We are committed to fostering innovation and delivering forward-looking solutions through the controlled evolution of enhanced tools and methodologies all in compliance with the IMO statutory instruments as transposed by the Flag States.

Care should be taken not to move prematurely towards detailed regulatory conclusions without sufficient maturity and shared understanding of remote survey methodologies and supporting digital capabilities. Current discussions tend to focus primarily on identifying which survey items may be conducted remotely. However, greater emphasis should be placed on how a combination of remote survey techniques and data-driven evidence can collectively achieve an equivalent level of assurance.

It should be recognized that technologies related to remote survey, data acquisition, and data availability are evolving rapidly, and industry experience continues to develop. Classification Societies, through their accumulated experience, practical insights of how to perform surveys and access to extensive data, are uniquely positioned to define and demonstrate equivalence in a robust and credible manner.

BACKGROUND

IACS has issued UR Z29 which gives requirements for remote classification surveys. Concurrently, the IMO Survey Guidelines under the Harmonized System of Survey and Certification (HSSC) as amended introduce remote statutory surveys, a prerogative of Flag State Administrations. In August 2025, IACS noted that IMO Sub-Committee III finalized the draft Guidance on Assessments and Applications of Remote Surveys, ISM Code Audits and ISPS Code Verifications, slated for imminent adoption.

Furthermore, IMO Sub-Committee III established an HSSC Correspondence Group to develop a remote survey eligibility coding system. This system will be integrated into the amended IMO HSSC Survey Guidelines to designate eligibility for remote execution per survey item of a given survey. Its purpose is to establish unified and transparent provisions for identifying remotely feasible survey items, enabling stakeholders including Flag State Administrations and ROs acting on their behalf, shipowners to swiftly confirm applicability, resolve inconsistent industry interpretations, and streamline remote survey implementation.

SUMMARY OF KEY ISSUES

Despite the possibility of remote survey, IACS recognizes several challenges and considerations for its implementation across the maritime industry. Key issues include:

1. Remote Survey eligibility under normal circumstances and extraordinary circumstances – It is necessary to clarify the applicable conditions of remote survey under different scenarios, including the corresponding identification standards for whether a survey item can be carried out remotely under normal circumstances and under extraordinary circumstances such as regional conflict, epidemic prevention and control, or port restrictions. At present, differences in the understanding of applicable boundaries between stakeholders need to be unified through clear provisions. All parties involved in remote survey, including Flag State Administrations, classification societies, shipowners and service providers, have not yet formed a clear consensus on the division of responsibilities in the processes of information submission, on site coordination, data verification and result confirmation, which may lead to responsibility disputes in practice.

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The approach to surveys under extraordinary circumstances should remain flexible. Such situations are, by nature, not part of routine handling, and the appropriate response will depend on the specific context. Experience gained during recent events, including the COVID-19 pandemic and regional disruptions, has demonstrated the importance of maintaining adaptability. In this regard, it may be beneficial to reconsider the current formulation of relevant provisions to ensure sufficient flexibility is retained.

2. Absence of an agreed method or procedure for consistent determination and assignment of remote survey eligible items – In the process of promoting the development of the remote survey eligibility coding system, it is necessary to have an agreed consistent approach for assigning remote survey eligibility codes, helping support objective and consistent determination of remote survey eligibility.

3. Common understanding of equivalence or an equivalent level of assurance of the remote survey as compared to physical survey – Compared with traditional on site physical survey, remote survey has differences in technical implementation and execution processes. While the industry continues to work towards a common understanding of equivalence between remote and physical surveys, it should be recognised that IACS Members have already accumulated several years of experience in conducting remote surveys with generally satisfactory outcomes. The focus may therefore be on consolidating this experience and articulating clear principles for demonstrating equivalence, rather than implying uncertainty in current practice.

When addressing remote surveys, it is important to consider broader and evolving assurance models, including concepts such as continuous verification. The current understanding of remote surveys should be expected to evolve over time.

4. Consistency for overlap between remote classification survey and remote statutory survey – Remote classification surveys and remote statutory surveys for vessels share extensive and often common survey scopes. Maintaining consistency across overlapping work is vital to eliminate redundant tasks, prevent regulatory conflicts and guarantee safety compliance. Both surveys shall comply with unified eligibility rules and regulations, data standards and technical specifications set by IACS, IMO and relevant Flag State Administrations. It is necessary to coordinate survey planning, standardize on site operation procedures and adopt integrated reporting with uniform evaluation criteria, to ensure remote surveys deliver the same assurance level as traditional on board surveys. Divergent rule interpretations and uneven on board digital infrastructure remain major challenges, which can be addressed via pre survey communication, joint training and unified technical requirements. Harmonized practices will cut operational costs, streamline maritime compliance and promote the sound application of remote survey technologies in the shipping industry. It may also be beneficial to encourage greater harmonisation between Flag State Administrations and classification societies in the acceptance and application of remote survey approaches. Enhanced alignment would facilitate concurrent execution of statutory and class surveys, reduce operational inefficiencies and support consistent implementation across the industry.

5. Need for a regulatory framework enabling assurance and innovation. The IMO has already established a foundation for remote and hybrid survey approaches, including the application of risk-based principles. It would be appropriate for IMO to focus on goal-based, functional requirements, while allowing IACS to further develop the detailed technical and survey criteria. In addition, it may be beneficial to further develop the initial IMO framework by broadening the concept of acceptable evidence supporting survey outcomes.

IACS POSITION

Remote surveys have emerged as a necessary and evolving component of ship survey regimes, driven by technological advancements and accelerated by extraordinary circumstances beyond the control of stakeholders. Consistent with its commitment to digitalization and innovation, IACS is dedicated to fostering innovation and delivering forward-looking solutions through the effective use of advanced technologies and enhanced methodologies. IACS will take a leading role in adopting these technologies and sharing accumulated experience and outcomes with stakeholders.

While remote surveys offer flexibility, efficiency, and support continuity of ship operations, important challenges remain—particularly in relation to regulatory alignment, assurance of survey quality, and dependence on enabling technologies. The future evolution of remote surveys will be shaped by continued technological advancements, the

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development of clear and harmonized regulatory frameworks, and the need to preserve the integrity, credibility, and robustness of classification and statutory systems.

By leveraging cutting-edge digital infrastructure, data analytics and secure connectivity, we enable safer, more efficient and resilient survey processes that uphold the highest standards of maritime safety, environmental protection and regulatory compliance. IACS and its Member Societies collaborate closely to develop unified frameworks, best practices and technical guidelines for remote operations, ensuring interoperability, transparency and consistent quality across global fleets. This strategic approach not only responds to industry demands for agility and cost-effectiveness but also reinforces trust in digital verification while maintaining the rigor and integrity that define IACS assurance.

SUMMARY OF WORK CARRIED OUT BY IACS ON THIS ISSUE TO DATE

IACS has been actively engaged in advancing remote survey provisions. Notable activities include:

1. Establishment of a small group with necessary experts to revise IACS UR Z29 for alignment with draft IMO Instruments in a timely manner, avoiding any potential conflicts and enhancing the scope of class remote survey to benefit relevant stakeholders in a positive and constructive step toward a more risk-based and evidence-driven framework.

2. Active participation in the IMO HSSC Correspondence Group to discuss the development of an eligibility coding system.

3. Establishment of a Project Team to develop IACS provisions for remote certification of materials, components and equipment, addressing the current gap in both IMO and IACS instruments. This work includes clarifying the certification process, verification methods and validity confirmation etc.

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