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PractIce of China in receiving imo member state audit concerning aton session

# SUMMARY

This input paper introduces the practice of China in receiving IMO Member State Audit concerning AtoN session and highlights two best practices recognized by the audit team.

## Purpose of the document

Providing reference for the competent authorities of navigational AIDS of other countries and offering information when ARM Committee is going to update G1054 "Preparing for a Voluntary IMO Audit on Aids to Navigation Service Delivery" in the future.

## Related documents

G1054 [Preparing for a Voluntary IMO Audit on Aids to Navigation Service Delivery](https://www.iala.int/product/g1054/)

# Background

From 2 to 11 September 2024, four auditors from Denmark, Singapore, Thailand and the IMO Secretariat conducted an audit of China. China Maritime Safety Administration (MSA) is the main government entity responsible for implementing and enforcing IMO mandatory instruments. The audit was conducted in full accordance with the principles established in the IMO Member States Audit Mechanism Framework and Procedures and IMO Instruments Implementation Code (III Code). The objective of the audit was to determine the extent to which China complies with its obligations under the following IMO mandatory instruments: 1. The International Convention for the Safety of Life at Sea 1974 (SOLAS 1974), as amended; 2. The 1988 Protocol to the International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS 1988 Protocol).

# discussion

## Implementation of IMO Convention

## 3.1.1 Strategy

China launches an overall Plan for economic and social development every five-years, which provides general principles for policy making in the maritime sector. China MSA formulates annual work plans and targets based on the Plan.

## 3.1.2 Legislation

According to the nature of IMO mandatory instruments, China has adopted different methods to incorporate IMO mandatory instruments and amendments into its domestic legal system. IMO mandatory instruments are translated into national legislation by means of laws, administrative regulations and departmental regulations. In addition, normative instruments (technical standards, operational guidelines, and environmental and safety regimes) are used to implement IMO mandatory instruments. The regulatory documents issued by China are published on the website of the China MSA after promulgation.

## 3.1.3 Records

Chinese laws provide a framework for the identification, storage, protection, retrieval, retention and disposal of records. The various government agencies involved in the implementation and enforcement of IMO mandatory instruments maintain records in accordance with legal provisions.

Eastern China Navigation Center implements a quality management system (QMS), which includes documented filing procedures in compliance with the relevant legislation mentioned above. The quality management system is certified to the ISO 9001:2015 standard, which covers quality management, control, supervision and periodic evaluation. More than 20,000 markers are monitored and maintained remotely using 88 vessels and 28 buoy maintenance workshops.

## 3.1.4 Improvement

China MSA has implemented a quality management system certified to the ISO 9001:2015 standard, continuously monitoring and reviewing its work processes.

An evaluation report on the performance of navigation AIDS is published annually, including the achievement of targets (KPIs).

In addition, training courses and other technical cooperation activities, such as the International Level 1 ATON Manager Course were carried out.

## IMO audit methods

The audit was conducted by obtaining objective evidence through a series of visits, interviews, reviews of written records and databases to determine the extent to which China meets the requirements of the IMO instruments.

## Process and Preparation for audit

From September 2nd - 3rd, four auditors attended the audit in Beijing, China, focusing on organization, strategy, legislation and supervision of China in maritime sector. From September 5th - 6th, they verified in Shanghai, checking execution and records. AIS service was audited for about 3 hours on the morning of the 6th. From September 7th - 8th, the audit team met and prepared in Beijing. On September 9th, they audited other sessions in Beijing via on-site and remote means. On September 10th, the team had an internal briefing. On September 11th, the closing meeting was held to present findings and observations.

China MSA has prepared the performance report, slide presentation, records and improvement materials of the past five years, and senior experts familiar with the navigational aids business made introductions and answered questions.

The performance report and presentation included a number of modules, mainly introducing the system and mechanism arrangement of the Chinese government in the navigation and navigational aids areas, the personnel, the coverage of international conventions, domestic laws and regulations, technical norms and management documents, the equipment and facilities support, and the overall evaluation.

China MSA provided access to written records and databases, ensured smooth visits and interviews of the auditors, and presented evidences of implementing the IMO instruments. The last five years of records and areas of improvement were provided. The data were derived from the quality management system (QMS) records, covering the whole process of AtoN.

## Audit conclusion

No observations concerning AtoN were found during the audit. Two of the practices were identified as best practices by the IMO Audit Team: 1. implementation of an ISO 9001-certified quality management system for AtoNs and 2.system for monitoring and remote control of AtoNs.

# Next STEP

China MSA will continue to fully discharge its obligations in AtoN services and is willing to share its experience with other countries.

# Action requested of the Committee

The Committee is requested to:

1 Note this paper;

2 Use this document as a reference when updating G1054 "Preparing for a Voluntary IMO Audit on Aids to Navigation Service Delivery" in the future.

1. Leave open if uncertain [↑](#footnote-ref-1)