

Extension of the Renewal Period for Annual DESIGN Audits During the COVID-19 Pandemic

IMCA has been asked to consider extending the permitted renewal period for annual DESIGN audits during the current COVID-19 pandemic. This Information Note will only apply where an annual DESIGN audit cannot currently be undertaken safely by competent personnel.

Background

The following extract from [Guidance on auditing of diving systems](#) (IMCA D 011) contains IMCA's standard approach to annual DESIGN audits:

“At a suitable time in the year, typically when there is an appropriate gap in operations, the annual DESIGN audit should be carried out. If prospective clients for the following months are known, it may be helpful to notify them in advance that the annual audit is planned and invite them to send a representative to attend the audit.

The audit report would typically be valid for a year, starting from the final day that the auditor/s spent onboard.

This document gives guidance on the annual audit of diving systems. However, a diving system with a valid annual audit would not become unsafe at 12 months and 1 day on expiry of the valid audit report.

This guidance recognises that diving plant and equipment is often operated in remote locations where it is difficult to carry out the required auditing in the appropriate time scales. This may also be the case because of operational reasons where the equipment is in constant use.

*Diving contractors are encouraged to plan ahead in order that the full annual audit can be renewed in time. However, if, due to operational circumstances, an annual audit cannot be renewed within the prescribed period then an extension of up to a **maximum** of 30 days can be issued if the diving or life support supervisor operating the system confirms, in writing, that it is operating satisfactorily and appears in good condition. Where there is one or more qualified equipment technician whose duties include maintaining the system, then they should also all confirm the system is satisfactory before such an extension is issued.”*

IMCA is aware that during the current COVID-19 pandemic, DESIGN audit personnel and third-party agencies who provide diving system auditing services, are facing global travel restrictions and may therefore be unable to carry out annual DESIGN audit renewals in accordance with the standard [IMCA D 011](#) guidance.

IMCA Policy for the Extension of the Renewal Period for Annual DESIGN Audits during the COVID-19 Pandemic

Given the exigencies of the current global emergency, IMCA recommends that its Members and their clients should accept an extension to the validity of annual DESIGN audits, issued by the original auditor/s (or audit company), up to a period of 90 days beyond the expiry date of the current DESIGN report.

Before granting such an extension, the auditor/s may want to consider some or all of the following:

- ◆ Provision of access to a 'live' DESIGN or Planned Maintenance System (PMS) programme for the diving system under review;
- ◆ Output from the PMS confirming the current status of the system maintenance;
- ◆ Copies of any relevant third-party certification that has been issued since the last audit;
- ◆ Details of any technical changes carried out on the system since the last audit;

- ◆ A statement from the company dive technicians regarding the continuing fitness for purpose of the diving system under review;
- ◆ Photographic evidence of the current condition of the system/equipment;
- ◆ Evidence that all non-conformances identified during the previous audit have been addressed and closed out;
- ◆ Video evidence of the testing of any safety critical components e.g. the launch and recovery systems.

Having undertaken the necessary due diligence, auditors may decide to issue an extension of up to 90 days beyond the expiry date of the original audit, on a case-by-case basis.

Where relevant national legislation applies, this must always be complied with. Should an examination be required under national legislation, the relevant authority must be contacted for guidance during this difficult period.

This Information Note will be kept under review and, if necessary, the above policy may be amended.