



INTERNATIONAL MARINE OIL SPILL RESPONSE ORGANISATIONS (OSRO) SCHEME OF ACCREDITATION

THE NAUTICAL INSTITUTE

April 2023

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UK marine oil spill response providers. Scheme of accreditation

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NI Approval authority for Issue

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NI Version control sheet

Version	Corrections made
Revision 1	
Revision 2	General document check

Document References

Name	Link
IPIECA OGP The global distribution and assessment of major oil spill response resources 2015, Revised 2016	http://www.ipieca.org/resources/awareness-briefing/the-global-distribution-and-assessment-of-major-oil-spill-response-resources/

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1 Definitions

Accreditation is defined by The Nautical Institute (NI) as the systematic verification of the processes, procedures, methods and techniques employed to deliver a maritime product or service in accordance with standards defined, co-developed and approved by The NI with industry stakeholders.

Accredited response providers have demonstrated that their product or service meets the standard required for NI accreditation. This award is valid for a period of not more than three years. In some cases, accreditation will be subject to government regulations and audit.

To assess is to evaluate the nature, ability or quality of the object assessed.

To verify is to prove the truth of - by presentation of evidence or testimony; to check the accuracy of the object examined.

To approve is to have a positive opinion that something is good or acceptable.

Response provider (OSRO Oil Spill Removal Organisation)

A response provider, commonly referred to as an OSRO, is a company or entity that delivers the response service and offers itself up for accreditation.

Joint Venture

The NI defines a joint venture (JV) as an association or contractual business undertaking between two or more individuals or companies engaged in a solitary business enterprise for profit without actual partnership or incorporation.

JV's that require an accreditation should apply in the same way as non JV companies.

A company with accreditation cannot automatically apply that accreditation to a JV partnership. Each case will be reviewed separately by the NI. In some cases, an additional accreditation may be required.

2 Introduction to the Oil Spill Response Provider Scheme of Accreditation

This document provides details of how the Nautical Institute Scheme of Accreditation will operate. The document is intended to provide information to response providers outside of the UK regarding the NI Scheme.

The NI now offer a scheme of accreditation to OSRO's wishing to demonstrate a level of oil spill response service that complies with international best practise.

As a demonstration of qualification the NI is approved by the UK's MCA (Maritime and Coastguard Agency), being the UK's National Competent authority, to accredit UK response companies to a UK OSRO standards.

OSRO's achieving the NI's international standard will be able to demonstrate to their clients that they operate to best international practices for delivery of OSRO Services

The NI will apply the criteria as documented by IPIECA (International Petroleum Industry Environmental Conservation Association) as the basis for accreditation of OSRO's outside of the UK

The document used is the " The global distribution and assessment of major oil spill response resources " published by IPIECA OGP 2015 Revised 2016

Capability.

In addition to meeting the specification in the IPIECA document the OSRO's will reviewed against meeting their capability as defined in their Capability Statement

OSRO's can apply for accreditation in several different categories

- Dispersant Application - marine and / or air deployed
- Sheltered/Enclosed Waters – Ports, harbours, enclosed lochs etc
- Coastal and Large Estuary – Exposed shorelines, large estuaries etc
- Offshore waters – all unsheltered waters;
- Shoreline clean up

Accreditation will be for the stated capability and categories will last for three years after which the OSRO will need to re-apply to the NI for re-accreditation, or earlier if capability / categories change in the interim period

OSROs that have achieved the status will be recorded on the NI website for client information.

3 OSRO Accreditation Scheme Policy Group (OSRO SPG)

3.1 Scheme governance

The NI International OSRO scheme is overseen by an internal Policy Group, comprising of the NI's CEO and the NI's scheme manager which operate under the following Terms of Reference: -

1. Reviews work of external bodies such as the IMO and IPIECA OGP to ensure the technical content of the NI's Standard meets best industry practise.
2. Publishes guidelines and tools for OSROs and accreditation bodies to assist with their accreditation process.
3. Meets annually (virtually) with accredited providers to share lessons and promote best practises.
4. Review and develop the scheme in respect to an ever-changing maritime industry and regulatory environment.
5. Evaluate effectiveness, of the Scheme, in providing effective responders.
6. Makes decisions and implements actions to improve the Scheme and promote best practice.
7. Takes measures to ensure consistency of approach and measurement across accreditation bodies
8. Considers and agrees funding model.
9. Makes its decisions on a consensus basis.

The NI also maintain a close relationship with the IMO and IPIECA. The NI will seek advice from the IMO and IPIECA regarding the Scheme and keep them apprised of the Scheme development and membership. The IMO recognise the NI as an accreditation body

3.2 Quality Standards

The Nautical Institute has achieved the following quality standard which will be applied to this scheme of accreditation.

ISO 9001 2015 Quality Management certified by United Kingdom Accreditation Service (UKAS).

4 The Nautical Institute accreditation process

4.1 Requesting accreditation

A provider wishing to seek Nautical Institute accreditation can do so by contacting the NI's accreditation team and follow this contact with a formal written request.

4.1.1 Contents of a formal request for accreditation.

The formal request for accreditation should contain the following information:

- Details of the OSRO;
- Details of the contact person at the OSRO;
- Activities for which approval is sought
- Categories of application
- Nature of business
- Signed terms of business.

A form is provided in Appendix 1 to record the application.

4.1.2 Timing of the request

The NI requires OSRO's to apply for accreditation at least three months before the date requested for assessment so that pre-assessment queries can be resolved, and travel booked in good time.

4.1.3 Accreditation agreement

Before progressing with the accreditation process, the provider must sign and return the accreditation agreement with the NI provided at the time of enquiry (see Appendix 1 for the form and details of where to send it).

4.1.4 Setting an audit date

The NI and the provider will agree a date for the audit based upon the availability of auditors and the schedule at the OSRO.

It is possible that there will be a requirement for two auditors, one of whom will audit the technical components and the other a trained auditor linked to the NI's administrative staff who will audit the OSRO's administrative and management procedures.

Additional specialist assessors may be identified when appropriate. The actual number of auditors assigned will be at the discretion of the NI.

The number of days will be determined by the scale of the services offered by the provider. An estimate will be provided following an initial discussion.

The scheme permits some elements of the audit to take place during exercises or actual responses. The provider should advise the NI in advance of any exercises that are forthcoming so that advantage can be taken to complete some elements of the audit outside of the normal review frequency.

4.1.5 Duties and conduct of accreditation team members

Team members will:

- Review and report on the materials submitted by response provider;
- Participate in accreditation visits and related activities.

- Maintain confidentiality with respect to information gained from OSRO's during the accreditation process;
- Return all materials received from an applicant; and
- Act in the best interest of the provider and the NI and in accordance with good professional conduct.

4.2 Documentation to be submitted to the NI prior to the audit

The assessors will require the following documentation a **minimum** of one month before the audit takes place:

- OSRO background and overview;
- Health and safety information including operational response risk assessments;
- Control of documents policy;
- Complaints policy;
- HSE Policy;
- Lessons learnt / near miss reporting policy;
- Certificates of quality management;
- Capability statement and matrix completed as defined in the UK Standard;
- Evidence to support the Capability Statement and Capability Matrix which fulfil the NI's core requirements and any applicable category specific requirements; this could include, for example:
 - A sample of staff CV's,
 - Details of response bases (inventory, photos, floor plans etc.),
 - Copies of policies plans and procedures e.g. for health and safety, business continuity, planned preventative maintenance, mobilisation, duty rosters, internal audit, reporting,
 - Processes for initial staff selection, training and continuous improvement,
 - Any relevant third-party agreements (e.g. waste carrier, boat provider, equipment transport, crane company, other marine accredited OSRO),
 - Case studies, testimonials and references;
- Client risk assessment process:
 - An overarching risk assessment for multiple clients response and contingency planning/managing client expectations,
- Previous audit review's action tracking closure reports if relevant.

If the documentation is not received within the time frame specified the NI may cancel the arranged audit, with the resulting loss (travel/accommodation costs/etc.) borne by the OSRO. To maintain a high audit standard, the NI auditors need time to review documentation before arriving at the OSRO and also to reduce the amount of time required on site.

4.3 What will be assessed and validated during the audit?

The IPIECA document referred to contains the requirements that need to be met by an OSRO. The ability for the OSRO to deliver the services as outline in their capability statement.

4.4 The audit plan

In most instances the audit will proceed to the following schedule:

Pre-audit:

All documents submitted to the accreditation body by the OSRO will be reviewed. The list of documents is given in Section 4.2

Base audit

(this may take more than 1 day)

Where an OSRO operates from more than one base, details of subsidiary bases and their capabilities should be included with the Accreditation Application. These will be reviewed at the same time as the main base audit. Where an OSRO operates more than one main base or subsidiary bases each covering a specific geographic area, separate assessor audits may be necessary.

An opening meeting will take place, where documents already submitted will be reviewed, along with record keeping, policies not previously submitted, staff training records, risk assessment procedures, accident reporting documentation and additional case studies of incidents attended.

Assessors will view equipment in the warehouse, including spares and PPE. Assessors will also verify that a planned preventative maintenance system is being followed and that an equipment quarantine area exists.

A closing meeting will be held to discuss the audit findings.

- Post-audit findings will be documented and reviewed. A decision will be made regarding the accreditation status of the OSRO; this decision will be given to the OSRO by email, followed up by formal letter. Accreditation will be awarded on a probationary basis and only confirmed after an exercise/spill has been observed.

Exercise audit

Within six months of accreditation award the NI is required to observe the OSRO's performance using equipment at an incident or exercise. Arrangements to view the exercise will be determined with the OSRO during the base audit visit. The exercise or actual spill response should demonstrate that the OSRO can apply the equipment, techniques and strategies appropriate to their stated capability.

Response to real events can qualify, fully or partially, towards the Exercise requirement as long as the response is fully documented with a closeout report containing HSE findings and follow up / improvement plan.

Audit grading

Audits will essentially follow the question set provided in the IPIECA document.

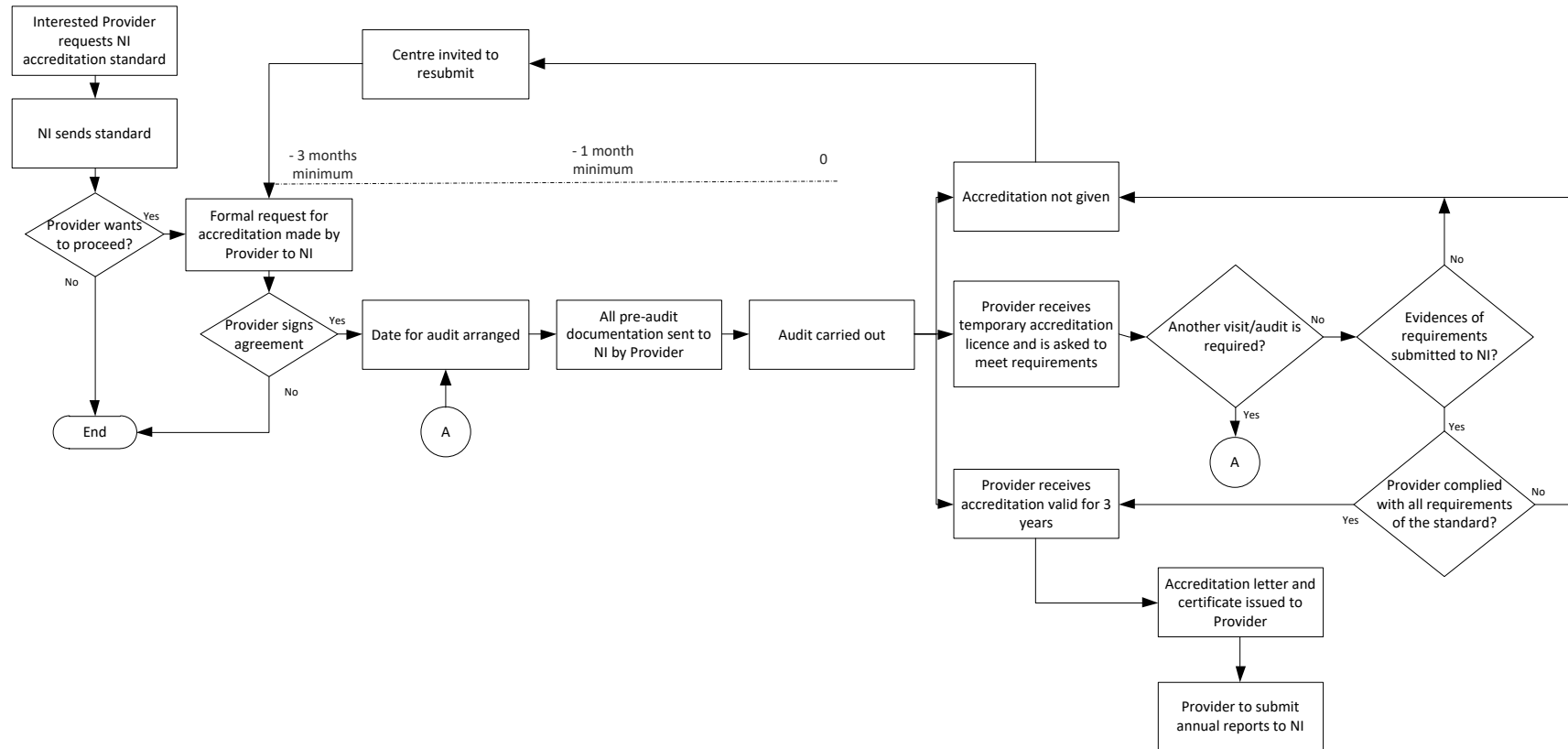
A "traffic light" reporting system will be completed by the Auditor. This system will be used for the site visit and exercise performance checklist and question set.

The coding will be as follows

- Red = Not acceptable, does not meet Standard. Immediate action required to rectify
- Orange= Acceptable in part but with Requirements. Meets the Standard in part only. Action required within time frame specified
- Green= Fully acceptable. Meets the standard. May have Recommendations that are observational only.

Accreditation process illustration

Figure 1 Accreditation process



In summary:- A business or entity wishing to offer response services formally applies to the NI. The NI sends auditors to assess the services delivered by that OSRO to verify that they meet the relevant standards defined. The NI Accreditation Team will discuss the recommendation of the audit team and if the decision is made to approve the OSRO the NI will accredit that entity. The summary process is illustrated in the diagram.

4.5 The decision to accredit

The Nautical Institute will write formally to award accreditation at three levels:

Level 1 Accredited: the OSRO will be accredited as a OSRO for three years and will be required to submit annual reports to the NI throughout this period. (Annual report as defined in the UK Standard)

Level 2 Accredited subject to minor or major improvements:

Minor improvements: the OSRO must make minor improvements during which time they will usually be allowed to continue to operate. Depending on the nature of the improvements to be made, written and/or photographic evidence of the improvement may be all that is required by the NI from the OSRO. In certain instances, a follow-up visit may be required by the auditor/s. Once the improvements have been completed and validated, the OSRO will be accredited as a response OSRO for three years from the date the initial audit was carried out and will be required to submit annual reports to the NI throughout this period (annual report as defined in the UK Standard).

Major improvements: accredited on completion of significant improvements which must be confirmed by due dates; the OSRO must make significant improvements during which time they may have to suspend the delivery of response services. In most cases where significant improvements are needed a follow-up audit will be required. This will be at the expense of the OSRO. Once the improvements are completed and validated, the OSRO will be accredited as an OSRO, however, a shorter period than the usual three years may be stipulated. During the period for which accreditation is granted the response provider will be required to submit annual reports to the NI (annual report as defined in the UK Standard).

Level 3 Failure with reasons and invitation to re-submit.

4.6 Withdrawal of accreditation

Accreditation may be cancelled or withdrawn for any of the following reasons:

- Failure to settle the accreditation/re-accreditation invoice within 90 days;
- Failure to be re-accredited within three months of the expiry date of the existing accreditation,
- Failure to witness exercise (except in case of real event being acceptable in lieu)
- Bankruptcy/receivership or liquidation of the OSRO or their parent organisation;
- Failure to notify the Accreditation Body of significant changes to the OSRO management or response delivery capability;
- Failure to notify the Accreditation Body of additional contractual commitments which may affect response capability;
- Failure to complete recommendations within the three-month time frame;
- Misrepresentation, misuse, abuse or misdemeanour relating to the accreditation OSRO;
- Failure to comply with the accreditor's policies for accreditation and certification;
- Failure to submit annual report as specified in the MCA UK Standard's requirements;
- Engaging in any illegal activity;
- End of partnership or joint-venture between two accredited organisations
- Probationary accreditation may be withdrawn if the conditions set out in the initial audit were not met within six months; and
- Failure to professionally and adequately deal with an actual spill due to negligence or a stated capability not being available (e.g. an inappropriate response technique being applied, failure of staff to observe health and safety procedures, specific stated resources not being available) This may result

in a spot audit requirement and, depending on the findings, remedial action being taken by the OSRO. In practice this could lead to probationary status being re-applied while deficiencies are addressed, or accreditation being withdrawn altogether.

Notice of the decision to withdraw accreditation, or not to issue accreditation in the first place, will be made in writing to the centre, outlining the reasons for the decision. This decision can be appealed, for instruction on how to do so, refer to the Complaints and Appeals section of this document.

4.7 Certification

On successfully obtaining accreditation, the NI will issue a certificate to the provider with authorisation to add the NI's logo and the words *accredited by the NI* to its information literature.

The period of accreditation is for 3 years.

The Certification will refer to the Categories that have been applied for and accredited.

4.8 When an OSRO changes location

If a response OSRO changes location/premises or equipment used (significant changes only) for practical response it must notify the NI of that fact. A date will be arranged, and a new audit will be carried out at the cost of the OSRO.

4.9 Spot audits

The NI retains the right to visit any accredited OSRO to carry out a spot audit for the purpose of maintenance of Accreditation standards. The cost for such a spot audit will be borne by the OSRO.

4.10 The cost of assessment

The Nautical Institute is a not-for-profit organisation and will carry out the assessment at full cost recovery plus administrative overheads.

Typical elements of costs are as follows:

- Pre-visit assessment, reviewing documentation
- OSRO assessment
- Travel and accommodation as relevant to the OSRO and to the exercise locations
- Follow-up actions

The NI will charge a day rate (2019 = £826) plus reasonable travel expenses. Any overnight stays will be in budget class style. Travel will be rail (second class), air (LCC) or road . The NI travel policy is available upon request.

Costs will be subject to variations dependent upon for example: the scale / scope of the responder's capability, the number of response bases, manning levels, Providers should contact The NI for an estimation of costs in the context of their specific requirements. All costs are billed in GBP and will be subject to annual review.

4.11 Returns

The OSRO is required to submit an annual return summarising actual responses, incidents or major organisational developments.

The NI as the Accrediting Body will summarise the returns from the OSROs and compile an overview report for presentation at the policy and governance meetings.

4.12 GDPR Statement

The Nautical Institute processes personal data on a 'legitimate interests' basis under Article 6 (1) of the GDPR. This enables the Institute to provide a full range of services to its members and also services relating to its dynamic positioning (DP), accreditation and publications activities.

Full details of the NI's privacy policy are available on its website: <https://www.nialexisplatform.org/privacy-policy/>

Please note that any information received as a result of Accreditation application and any subsequent Accreditation correspondence may be stored electronically on a database held by the Scheme. Any information provided may be shared with the MCA as required.

OSROs, in their handling of 3rd party data, which is in this context data on clients, must ensure that they are also fully compliant with GDPR.

5 Complaint or appeal procedure

General enquiries and correspondence relating to the Scheme should be directed to The NI using the contact details below:

Complaints

Complaints and disputes relating to the NI's OSR Accreditation Standard or its officers should be directed to Chief Operating Officer at The NI using john.lloyd@nautinst.org. Acknowledgements will normally be made within seven days and a response given within 30 days. Decisions made by the Executive Board of The NI will, in all matters, be considered final

Appeals against award

Any issues that arise as a result of the OSRO's premises inspection will be conveyed to the OSRO in the form of a report outlining the changes that need to occur before Accreditation can be considered.

If an OSRO fails to meet the Accreditation standard they will have the opportunity to provide additional information/clarification and have their application reassessed.

Any dispute regarding the assessment of the OSRO's suitability for Accreditation will be referred to the NI's Council for comment resolution.

The resolution procedure may entail a re-visit to the OSRO and this cost will be borne by the OSRO as per the Accreditation agreement.

6 The Nautical Institute Core OSRO Requirements

6.1 Organisation of the standard

To achieve the NI accreditation, award the OSRO must meet, in addition to the requirements as specified in the IPIECA OGP document, the following foundation level requirements set by the NI.

Please note some of these elements may not have to be reviewed if the OSRO has obtained relevant ISO or similar quality management system relevant to its business as an oil spill responder

6.1.1 Appraisals

The OSRO shall put in place an appraisal system to assess staff skills and competence. Records of the implementation of this system shall be kept including actions taken for staff improvement.

6.1.2 Feedback system

The OSRO shall establish management reviews, monitoring and customer feedback systems to ensure its continuing suitability, adequacy and effectiveness. This review shall include assessing opportunities for improvement and the need for changes to the quality of the OSRO's response performance, including policies and objectives.

The review documents must include information on:

- Result of audits;
- Customer feedback;
- Status of preventive and corrective actions;
- Follow-up actions from previous management reviews;
- Changes that could affect the quality management system; and
- Recommendations for improvement.

The outputs expected from the reviews may include:

- improvement of the effectiveness of the documentation and communication process;
- updates to materials e.g. operating procedures, risk assessment, competency standards; and
- reduction in customer complaints.

6.2 General administration

- The OSRO shall have any relevant country specific licence documentation showing that it is legally eligible to operate as a response OSRO, including, where necessary, a waste carrier licence; and
- The OSRO shall provide evidence of relevant insurance to conduct the response categories applied for.

6.2.1 Control of documents

Scheme documents/ circulars and official messages

All documents must be collected and available to staff at any time. The OSRO needs to be able to show that the Scheme requirements were put in place and applied in the OSRO's procedures.

Documented procedures shall be established to define the controls needed:

1. To approve documents prior to issue.
2. To review and update as necessary and re-approve documents.
3. To ensure that changes and the current revision status of documents are identified.

4. To ensure that relevant versions of applicable documents are available at points of use.
5. To ensure that documents remain legible and readily identifiable.
6. To prevent the unintended use of obsolete documents, and to apply suitable identification to them if they are retained for any purpose.

6.2.2 Control of records

Records shall be established and maintained to provide evidence of conformity to requirements and of the effective operation of the quality management system. Records shall remain legible, readily identifiable and retrievable. A documented procedure shall be established to define the controls needed for the identification, storage, protection, retrieval, retention time and disposition of records.

Documents are required to be stored for the period determined by OSRO internal regulations, or any prevailing statutory rules. (e.g. certification of lifting equipment) . As a minimum the NI require that the OSRO keeps the records for the period of the accreditation as they shall be checked during the next audit/re-accreditation process.

6.2.3 Customer feedback system

Following an exercise or OSRO attendance at an actual spill, customer feedback forms should be used to assess the general quality of the OSRO in the performance of its response tasks and the helpfulness/professionalism of staff. The feedback about individual responders shall be used to assist in their annual appraisal and/or to improve responder capability with a view to the continuous professional development of the responder. The feedback system should also require the customer to comment upon the OSRO as an organisation.

6.2.4 Complaints and appeal procedure

The OSRO must have documented processes and procedures in place to deal with complaints and appeals against them by their clients. See Section 5 for complains and appeals against the accreditation body or its findings.

7 Auditor selection and approval

To qualify as an NI auditor for this Standard the NI requires auditors to offer credentials as an SME in oil spill response and as an auditor.

Typically, the NI auditor would have the following attributes:-

Peer recognition of OSR SME status
Proven experience in oil spill response
Have attended varied types of spills
Have worked at an oil spill base in at least a supervisory capacity
Hold auditing skills

The CEO of the NI would approve the auditors.

Additionally, the auditor will need the support and back up of the NI as the professional organisation to support the audit process in the form of quality assurance and to provide a second layer of checks on the audit process itself

7.1 Auditor selection procedure

The auditor's credentials for performing the work will be signed off by the CEO of the NI and the OSRO Scheme Manager.

The auditor's credentials will be submitted to MCA / BEIS for information and comment.

The auditor is expected to hold the following skills:

- Experience in practical oil spill response as operator, supervisor and response manager
- Experience in running a response OSRO
- Exercise of theory of oil spill response
- Experience in auditing
- Proven communication skills
- Have no conflict of interest with OSRO, MCA/BEIS or NI.

7.2 List of auditors

The following is the current list of auditors deemed to be suitable qualified by the NI. CVs are retained by the NI. Auditors may be added or removed, MCA/BEIS will be informed for their agreement.

Name	Key Experience
Bernie Bennett	42 years of experience in maritime emergency response including Exxon Valdez and Deepwater Horizon
Richard Tatner	IMO approved trainer and Subject Matter Expert has responded to over 50 major spills including Deepwater Horizon and Sea Empress

Application form for accreditation / re-accreditation of Oil Spill Response Organisation

Please complete the Section A; form and Section B; agreement and return by email to bernie.bennett@nautinst.org

SECTION A

Section A: OSRO details	
Name	
Address	
Telephone	
Fax	
Email	
Website	
Person in Charge	
Contact Person	
Planned date for submission of documents	

SECTION B TERMS AND CONDITIONS OF BUSINESS

The provider agrees to the following conditions:

1. The provider voluntarily agrees to accept The Nautical Institute's accreditation standards, to submit the necessary documentation for accreditation and to receive the approval visit, if appropriate, in accordance with The Nautical Institute's policy and procedures.
2. The OSRO will be designated "accredited" when the accreditation team has completed its considerations and determined that the provider meets or exceeds a minimum standard. Subject to a right of appeal, which would be at their own expense, the providers will abide by the decision of the accreditation team.
4. The Nautical Institute and the provider will follow the procedures and policies developed, periodically reviewed and updated by The Nautical Institute regarding the setting of standards, reporting of information, complaints, display of certificates, use of The Nautical Institute logo, appeals and other matters.
5. The provider will use all practical means at its disposal to continuously ensure that the services it provides fully comply with the applicable accreditation standards at all times.
6. When an accreditation visit to a provider is required, requested, or otherwise deemed necessary or desirable, the Nautical Institute agrees with the provider the approximate date of the visit. Detailed arrangements for the visit are made through direct contact between the Nautical Institute and the provider.
7. The provider agrees that if a formal complaint is raised concerning their operation under the Nautical Institute's accreditation procedures, policies or standards, it will promptly comply with any requests of the Institute for necessary information. The provider agrees to reimburse the Nautical Institute for any related expenses incurred. If the claim was raised by another provider and is found to be without merit, the latter may be required to reimburse the Institute.
8. When reference is made to accreditation, the following may be used:
 - (i) "Accreditation by The Nautical Institute Probationary ", in a font and style established by the Institute, which may be used by a provider which has made application for accreditation, until that time it is notified of the accreditation team's decision;
 - (ii) The term "Accredited by The Nautical Institute", in a font and style established by the Institute, this may be used by a provider that has been notified that it has received either provisional or full accreditation.
9. The official logo of The Nautical Institute may be used on appropriate materials. The Institute will have the right to notify the provider of any material used or issued by them that the Institute considers to be incorrect, inappropriate or misleading.
10. The Nautical Institute recognises that providers material is the property of the providers and that all material submitted to the Institute will be treated as confidential.
11. The provider agrees not to hold the Nautical Institute, its directors, officers, members and employees liable for any loss, damages, costs, or expenses, which they may incur or be required to pay as a consequence of their actions.
12. This agreement will run from the date below. The agreement may be terminated on one month's notice from the Institute or the provider

13. The provider agrees to provide a purchase order and to pay the fees in GBP for accreditation when due and within the time scale documented on the NI invoice

The Nautical Institute is responsible for assessing organisations against the standards laid down in IPIECA best practise document for OSROs. The audit tests a company's compliance with the Standard and does not test or confirm its compliance with the law, which remains the responsibility of the company. While the holding of this accreditation is an indication of the integrity and competence of a company, it does not constitute an undertaking by The Nautical Institute that the company will maintain a particular level of competence and performance. A company achieving "Accredited Status" at the conclusion of the process will have demonstrated that they have met the best practise guidelines on the day of the audit. The accreditation will reflect the findings observed at the time of the document review, site visit and exercise observation. The company's performance at the time of an actual response may or may not be consistent with the practises observed and The Nautical Institute cannot be held liable for any shortfall in performance by the company at the time of such an incident."

Signature of the Responsible Person from the Response Organisation Date

Name and Title/Position of the Responsible Person from the Response Organisation

Name of Response Organisation

For Nautical Institute.

Signature

Name

Date