Handbook for Ship Security System Audit (For Non-Japanese Ships)

Based on the ISPS Code (International Ship and Port Facility Security Code)

ClassNK

NIPPON KAIJI KYOKAI Ship Management Systems Department

June 2024 (Ver. 20)

Handbook for Ship Security Systems Audit (Ver. 20)

Records of Revision

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July 2003	Established	_
Sept. 2017	17 th	-Revised "Introduction"Added "e-Application" serviceRevised the required documents at the SSP approvals or notices
Oct. 2021	18 th	-Revised the handling for SSP approval due to introduction of SSP Audit document management system.
Feb. 2022	19 th	-Revised description due to introduction of electronic audit records.
June 2024	20 th	-Revised due to abolishing to issue MS-SPA: Schedule for Review and Approval of SSP, and others of description.

The Society's Home Page (www.classnk.or.jp) →

Regarding the jurisdiction of each Branch or Office of the Society

Please refer to the "DIRECTORY" which is published by the Society. Note: an updated version of the same is available on the

For any questions about this "Handbook" please do not hesitate to contact the Ship Management Systems Department of the Society (ClassNK) Head Office.

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1. Introduction

According to SOLAS XI-2 and ISPS code, all passenger ships, cargo ships of 500 GT and above, and mobile offshore drilling unit engaged in international voyages must be carried out the ship security assessment, established the ship security plan and must possess an International Ship Security Certificate (ISSC) after initial audit confirming the practice of the plan on-board.

ClassNK has been authorized by many flag administrations as Recognized Security Organization (RSO), therefore, we've been conducting SSP approvals, shipboard audits and issuing ISSC on behalf of the administrations, exclude a few ex. Panama.

As stipulated in ISPS code A/9.4.11, a ship security plan (SSP) is required to review periodically. Please refer to item 7.1.2 for approval of SSP amendment.

The text of SOLAS convention (excerpt) and ISPS code are available on ClassNK Home page.

In addition, ClassNK have been promoting our services to digitization as follows.

- 1 We have posted the self-checklists for SSP approval and shipboard audit. And it's available to apply online the SSP approval and shipboard audit using "e-Application".
- .2 It's available for issuing secured ISSC by e-certificate (PDF), instead of paper one. Please refer to our Home Page.
- .3 Starting from Oct. 2021, we have been approving the SSP by electronical measure. We recommend our customers to use "e-Application" services for SSP approval both initial and amendment.
- .4 Starting from 30 January 2022, the reports after completion of ISPS audit would be issued electronically and send to the management company.
- .5 All our services above including this handbook are available from our Home Page, refer as below.

Checklist: Ship Security Management Systems (ISPS) | ClassNK - English Application form: Application Forms | ClassNK - English e-Application: http://e-Application | ClassNK - English

2. Abbreviations of terms

ISPS Code: International Ship and Port Facility Security Code

(Formal name: The International Code for the Security of Ships and of Port Facility)

ISSC: International Ship Security Certificate

SSP: Ship Security Plan

SSA: Ship Security Assessment CSO: Company Security Officer SSO: Ship Security Officer

RSO: Recognized Security Organization

DOC: Document of Compliance SMC: Safety Management Certificate SSAS: Ship Security Alert System

3. Definitions of Terms used in the Regulation and Code

3.1 Definitions of Terms in SOLASXI-2

"Company" means a Company as defined in regulation IX/1.

"Recognized Security Organization (RSO)" means an organization with appropriate expertise in security matters and with appropriate knowledge of ship and port operations authorized to carry out an assessment, or a certification activity, required by this chapter or by part A of the ISPS Code.

3.2 Definitions of Terms in the ISPS Code

"Ship Security Plan (SSP)" means a plan developed to ensure the application of measures designed to protect the persons on board, cargo, cargo transport units, ship's stores or the ship from the risks of a security incident.

"Ship Security Officer (SSO)" means the person on board the ship, accountable to the master, designated by the Company as responsible for the security of the ship, including implementation and maintenance of the ship security plan and for liaison with the Company security officer and port facility security officers. It was agreed at IMO that nothing would prevent the master from being appointed as an SSO.

Since 1 July 2009, it is required a "Certificate of proficiency" for SSO issued by the Administration in accordance with STCW Reg. VI/5.

"Company Security Officer (CSO)" means the person designated by the Company for ensuring that a ship security assessment is carried out; that a ship security plan is developed, submitted for approval, and thereafter implemented and maintained and for liaison with port facility security officers and ship security officer.

4. Applicable Ship Types

As a rule, the requirements apply to the following types of ships engaged on international voyages

- .1 passenger ships, including high-speed passenger craft;
- .2 cargo ships, including high-speed craft, of 500 gross tonnage and upwards; and
- .3 mobile offshore drilling units.

Please be advised that for Japanese ships, ClassNK prepared a separate Rule and Handbook.

5. Certificates

5.1 Types of Certificates and Validity

The types of ISSCs are as follows.

- .1 ISSC: Full term certificate issued under the authority of the Flag State.
- .2 Short Term ISSC: A certificate issued to cover the period until a full-term ISSC is issued. As a rule, it is issued after Initial, Renewal or Additional Audit.
- 3 Interim ISSC: A certificate that may be issued to a ship which has newly joined under management of a Company, or which has changed her Flag.

5.1.1 ISSC

An ISSC is issued to a ship which holds a Ship Security Plan (SSP) approved by the Flag State or by the Society or other Recognized Security Organization (RSO) on behalf of the Flag State, upon successful completion of an Initial Audit.

The validity of ISSC issued after the Initial Audit shall be five years from the last date of the Audit subject to execution of an Intermediate Audit. The validity

of an ISSC issued after the Renewal Audit shall be five years from the next day after the expiry date of existing ISSC when the Renewal Audit is completed within three months before the expiry date of existing ISSC; but when the Renewal Audit is completed more than three months before the expiry date of old ISSC, the new ISSC shall be valid from the date of completion of Renewal Audit for a period of five years.

The ISSC shall be endorsed upon successful completion of an Intermediate Audit, or of an Additional Audit where the flag Administration authorized to do so.

The ISSC shall be kept on board the ship and a copy of the ISSC shall be kept by the Company.

The expiry date of the ISSC may be harmonized to the expiry date on Safety Management Certificate (SMC) of the ship at the request of the Company.

Some flag Administrations have not authorized ClassNK to issue ISSC. In this case, please approach the flag Administration for the issuance of ISSC.

With regard to Commonwealth of Dominica, while the Society is authorized to carry out initial audits and to issue a short term ISSC (full term ISSC is issued by the Administration), the Society is not authorized to carry out an audit for the issuance of an Interim ISSC. Therefore, please apply for the audit to the flag Administration.

With regard to Japanese ships, ClassNK is not authorized to issue any form of certificate, while ClassNK is authorized to carry out audits, as addressed in another Handbook for Japanese flag ship. Please contact the Japanese Government for the issuance of certificates.

5.1.2 Short term ISSC

A short term ISSC could be issued if an Administration authorized ClassNK to issue it, for example in case of renewal audit for Panama flag ship. It could be issued after a renewal audit as a proof that the audit was completed successfully with satisfactory result.

5.1.3 Interim ISSC

An Interim ISSC valid for six months shall be issued to a ship subject to the following conditions.

- .1 when a ship does not hold ISSC, at delivery of the ship:
- .2 when a Company newly commences management of the ship:
- .3 when a ship's Flag is transferred (in case of not approval of SSP or according to flag requirement).

5.2 Extension, Invalidation, Re-issuance, Revision and Returning of Certificates

5.2.1 Extension of Validity of a Certificate

When a ship is underway to an intended port to undergo a Renewal Audit at the time of due date of the certificate, ISSC may be extended by not more than three months upon receipt authorization for extension issued by the Administration. However, when a ship arrives at the intended port, it shall not be permitted to leave the port without a renewal certificate or the current certificate with endorsement for extension based on the completion of renewal audit.

5.2.2 Invalidation of a Certificate

An existing certificate shall become invalid when:

- .1 a ship has not undergone the periodical Audit (Renewal, Intermediate):
- .2 remedial actions for non-compliance set out at the Audit have not been completed within the agreed period of time:
- .3 a part of the SSP which requires approval upon amendment has been amended without approval, or part of the SSP which does not require approval upon amendment has been amended without notification.
- .4 when a Company ceases managing the ship:
- .5 when a ship changes her Flag:
- .6 when Audit fees and expenses have not been paid:
- .7 when an ISSC is issued to replace an Interim ISSC:
- .8 when a Company requests withdrawal of the ship from the ISPS Register.

5.2.3 Re-issuance of a Certificate

When a certificate is lost or damaged, please request the Head Office of the Society (Ship Management Systems Department) for re-issue of the same.

5.2.4 Revising entries on a Certificate

When the particulars, such as ship's name, indicated on the certificate are changed, an Additional Audit is required to revise the entry on the ISSC. However, when changes are made only to the name or address of the Company, no Additional Shipboard Audit is required. Where the description of the SSP regarding changes for the name or address of the Company is amended, re-approval for the revision of the SSP may be required, therefore, please contact a local office of ClassNK.

5.2.5 Returning a Certificate

The Company is requested to return the certificate to Head Office or any offices convenient in the following cases:

- .1 when a new certificate is issued through renewal or re-writing, or other reason:
- .2 when a certificate has become invalid or expired:
- .3 when a lost certificate is found after receiving a re-issued certificate

6. Type of Audit and Timing for conduct the Audit

Types of Audits are as follows:

Initial Audit: Audit to issue an ISSC to a ship for the first time

Renewal Audit: Audit to renew the ISSC within not more than 5 years.

Intermediate Audit: Audit to be conducted between the 2nd and 3rd anniversary date. (Note 1)

Additional Audit: Includes the following Audits:

- a. Additional Audit to lift any non-compliance.
- b. Additional Audit to be conducted after re-approval of an major amendment to the SSP.
- c. Additional Audit other than the above.
 - •Change of particular on ISSC, e.g., Name and others

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•Replacement of SSAS

Audit for issuing interim ISSC

(*Note 1*)

Anniversary date means the day and month of each year that corresponds to the date of expiry of the ISSC.

7. Application for Audit and SSP Approval

Please use the application forms "(APPLI-CSA) or (MS-APPLI-SSP)" available on our Home page. (Application Forms | ClassNK - English)

Online web application service (e-Application) for ISPS shipboard audits and SSP approval are also provided for applicants.

Please access to the contents of e-Application in our website.

(e-Application | ClassNK - English)

7.1 Application for Ship Security Plan (SSP) Approval

Please submit Applications with electronical files for SSP approval or for reapproval of amendments to the approved SSP to the local office of the Society. The application by e-Application is recommended. As for Japanese Flag ships, our offices located in Japan would take in charge.

7.1.1 Initial Approval

7.1.1.1 Documents to be submitted

Please submit the following documents with electronical files when the Application of Initial SSP Approval is made.

- .1 Application form (MS-APPLI-SSP)
- .2 SSP
- .3 Report of Ship Security Assessment (SSA)
- .4 Copy of CSO's Training Certificate
- .5 Copy of (Provisional) Certificate of Registry
- .6 Copy of valid DOC

(If it is issued by other Party than NK)

Also please submit the following documents when these are not included in the SSP.

- 1 Procedure and organization chart of the Company that specify the responsibility and authority of the Company Security Officer (CSO) and other shore-based personnel relating to the ship security.
- Declaration of the Company stating that Company shall give necessary assistance to the CSO and master of ship to achieve their duties relating to the ship security. (ISPS A/6.2 related)

And also, please submit the following documents. (SOLAS XI-2 Reg.5 related)

- .3 Documents indicating the latest information on the following.
 - i) person responsible for appointing shipboard personnel
 - ii) person responsible for deciding the employment of the ship
 - iii) parties who are chartering the ship (when ship is chartered)

7.1.1.2 Review of the SSP

The submitted SSP shall be reviewed and approved if it is in compliance with SOLAS XI-2 and the ISPS Code. When the submitted SSP is found to be not in compliance, AIC (Auditor in charge) shall request its correction. (In case application is submitted by e-Application, the review will be smooth due to using online chat.) Approved SSP and SSA shall be stamped electronically and be returned to the Company by electronical files. The company is requested to send the files for the ship and keep them at the company. The Society shall retain only the cover page of SSP with approved stamp, record of amendments, contents of the SSP and the cover page of the SSA report. In addition to the above procedure, the Society will issue a document certifying approval of the SSP. (MS-LOA - Approval of Ship Security Plan)

7.1.2 Approval of Amendments to the approved SSP

In principle, any amendments made to the approved SSP is required reapproval. Please re-submit the SSP with electronical files to our local office for re-approval. As for the SSP re-approval for Japanese Flag ships, please submit Applications to our local offices located in Japan. The application by e-Application is recommended. Also please be noted that a Revision list should be updated at any amendments to the SSP. In case of amendment not related to ISPS Code A/9.4.1 - A/9.4.18, or approval of such amendments are waived by the flag Administration, a formal approval procedure is not necessary to, however, it is necessary be notified to ClassNK of such amendment made to the SSP. The Society will approve as Initial approval for the amendments made to the SSP which is not approved by this Society.

7.1.2.1 Documents to be submitted

(A) Approval of the amendment to the approved SSP.

Please submit the following documents when the Application for approval of amendments to the approved SSP.

- .1 Application form (MS-APPLI-SSP)
- .2 Cover of the amended SSP (if amended or requested by the company to put the approval stamp)
- .3 Index, revision record and revised page of the SSP
- .4 Report of the SSA that resulted in the amendment to the SSP (if any) (Note 2)
- .5 Copy of existing page which shall be superseded or documents that can refer to the comparison between new and old
- .6 Copy of CSO's Training Certificate
- .7 Copy of valid DOC
 (If it is issued by another Party than NK)

(*Note 2*)

Same as the initial approval, an SSA report, including On-scene security survey shall be included in the report of the SSA submitted for the approval of the amendment accordingly, if possible.

(B) Notification of the amendments to the SSP (to which approval is not required but revision record is made).

(Amendment not related to ISPS Code A/9.4.1 - A/9.4.18, or approval of such amendments are waived by the flag Administration) Please submit the following documents.

- .1 Application form (MS-APPLI-SSP)
- .2 Cover page of the SSP (If amended)
- .3 Index of the SSP (If amended)
- .4 Revision record of the amended SSP
- .5 Copy of existing page which shall be superseded or documents that can refer to the comparison between new and old
- .6 Pages of the SSP where amendments are made

Please be advised that companies which wish to revise some editorial correction, please submit the documents specified in 7.1.2.1 (B) above to the local offices. Please be noted that as for the editorial correction, there should be no revision in the cover, index and revision record of the SSP.

7.1.2.2 Review of amendments to the approved SSP

1. In case of above 7.1.2.1. (A), the submitted documents shall be reviewed and the SSP is re-approved if it is in compliance with SOLAS XI-2 and the ISPS Code. The re-approved SSP shall be stamped electronically and be returned to the Company by electronical files. The Company is requested to ensure replacing these pages of the SSP onboard.

The Society will issue a document certifying approval of the SSP (MS-LOA-AMD, Approval of Amendments to Ship Security Plan and MS-LOA-AMD-ATT, Attachment to MS-LOA-AMD).

In order to verify the implementation of the amended part of the SSP, the timing required for audit to confirm the verification onboard is to be specified in MS-LOA-AMD-ATT. Generally, onboard verification would be required by next periodical audit, if the amendment is not major, e.g., SSAS replacement.

In case the due date for the verification on-board is required, please apply for an additional audit by the due date. The additional audit could be conducted together with periodical audit if timing is matched.

2. In case of above 7.1.2.1.(B), the submitted documents shall be reviewed to verify that the amendments do not include any amendment which require approval. Upon completion of the review, amended pages shall be stamped electronically and then shall be returned to the company. The company is requested to send the files for the ship and to ensure the replacement. In this case, MS-LOA-AMD or MS-LOA-AMD-ATT will not be issued.

7.2 Application for Shipboard Audit

Please submit an application to apply for Shipboard Audit to the nearest office of the Society, where an audit will take place via e-Application services or e-mail.

When a port or a ship has a security level 3, the Society may not accept the application because a smooth execution of security Audit may be difficult. And generally, when a ship is not in normal operation, such as in dry-dock or at lay-up, the Society may not undergo a Ship Security Audit, except for an Audit for issuing Interim ISSC and for an audit for the verification of SSAS installation.

7.2.1 Documents to be submitted

Please submit the following documents:

- .1 Application (APPLI-CSA)
- .2 Copy of (Provisional) Certificate of Registry (To be attached in case of Non-NK Class ship)
- .3 Copy of DOC and SMC (or Interim SMC) of ISM Code.

 (To be attached in case of DOC/SMC issued by other Party than NK)
- .4 "Certificate of proficiency" for SSO issued by the Administration in accordance with STCW Reg. VI/5

7.3 Application for the transfer of ISPS Certification from the other IACS member society

- 7.3.1 If a company requests transfer of ISPS certification from the other IACS member society (hereunder referred to as "Losing Society"), please submit an application to the Society together with the following document. It will take a few days to complete the procedure including information acquisition from the losing society.
 - .1 Copy of ISSC, latest DOC and SMC issued by the loosing Society.
 - .2 Latest records of Audit conducted by the Losing Society.
 - .3 A copy of a document certifying approval of the SSP
- 7.3.2 It is not possible to accept a request for the transfer of ISPS certification in following cases:
 - .1 when ISSC has been invalid
 - .2 when change of management company is intended simultaneously
 - when an application is made to the Losing Society for any audit, but the audit is not yet carried out
 - .4 when corrective action has not been yet completed after a failure was pointed out during the previous audit by the Loosing Society.
- 7.3.3 The Society will contact the Losing Society in order to obtain records of audit in the past.
- 7.3.4 The audit for the transfer is to be carried out as an Additional Audit with a scope and degree equivalent to an Intermediate Audit. However, if it is carried out at the audit window for an initial, intermediate or a renewal audit, an applicable audit is to be carried out.
- 7.3.5 The Society will issue a new Full Term ISSC, taking-over the expiry date of the previous certificate issued by the losing society in case of the completion of intermediate audit or additional audit equivalent to intermediate audit for the transfer.
- 7.3.6 In case of the Panamanian flag ship, an audit will be conducted in accordance with the instruction of Flag Administration (PanamaMMC-359 section 17). Generally, ISSC will not be re-issued by flag administration.

8. Execution of Shipboard Audit

8.1 Initial Audit, Intermediate Audit and Renewal Audit

- 8.1.1 Auditor from our office in charge (OIC) will visit the ship. The Auditor conducts the Audit along with the Audit Plan, informed in advance, that includes an interview with the master, SSO, specific security personnel (if nominated), verification of records and checking the security measures of the ship and so on.
- 8.1.2 When a Non-conformity (NC) is found during the Initial or Renewal Audit for the Flag vessels with full term ISSC issued by the Administration (such as Panamanian Flag), the Audit could not be completed until the NC is rectified. And we could not issue a ISSC if any NC exists.
- 8.1.3 When a Non-conformity (NC) that is not rectified during the audit is found at Intermediate or Additional audit, the Auditor is to request correction of the NC, even endorsement could be made. The Auditor requests the Company to submit the corrective action plan (CAP) within two weeks, and requests an additional audit within three months from the date of the audit. The audit would be completed if the Auditor agreed the CAP. Generally, implementation of the CAP would be verified at "Additional audit to confirm the rectification of the NC".
- 8.1.4 Please pay attention, the ISSC becomes invalid if the NC is not solved by the agreed date, where the ship was requested "Additional Audit to confirm the rectification of elear the NC".
- 8.1.5 As attendants to the Audit, please nominate some crew who are familiar with the SSP, including the master or SSO.
- 8.1.6 Prior to an initial audit, please conduct at least one security related drill onboard. If not, an auditor will require a drill during an initial audit.
- 8.1.7 Please conduct the internal audits and review at intervals specified in SSP and keep the record onboard.
- 8.1.8 Please keep the records at least 5 years both onboard and in the company.

8.2 Audit for Issuing Interim ISSC

- 8.2.1 An Audit for Issuing Interim ISSC is to be conducted by the Auditor in charge. Please note that an Interim ISSC is issued when all of the following items have been verified.
 - shipboard personnel who have security duty are familiar with the duty and the responsibilities given in the SSP,
 - .2 SSO is given appropriate training and kept a "Certificate of proficiency" issued by the Administration or other contracting government that is recognized by the Flag Administration in accordance with STCW Reg. VI/5
 - a copy of an SSP meeting the requirements of SOLAS XI-2 and part A of ISPS Code A/9.4.1 A/9.4.18 is available on board, has been submitted for review and approval to the flag Administration or its RSO, and is being implemented on the ship. And the SSP is not required to be approved yet.
 - and please submit any document (such as copy of e-mail) that shows your company has already submitted the application for the SSP approval.

- .4 applicable national requirements are incorporated into the SSP
- at least one security related drill given in the SSP has been either carried out or planned by the SSO/CSO before the ship's departure
- .6 the SSAS is verified the following item:
 - a) witnessing transmission test or receiving receipt for completed the test successfully of the SSAS
 - b) operation of the SSAS as per ISPS Code A/9.4.17 and A/9.4.18
- .7 verification of the presence of CSR meeting SOLAS Reg. XI-1/5 or confirmation to submit to the Administration for approval.
- 8.2.2 In addition, the Auditor is to verify that a copy of valid DOC (including Interim DOC) is placed onboard the ship and the valid SMC (including Interim SMC) is/will be placed onboard the ship.

8.3 Additional Audits to clear any Non-conformity

Please refer to above 8.1.4. In principle, the extent of Audit is to be limited to the areas related to the Non-conformity.

8.4 Additional Audit after Re-Approval of Amendments to the SSP approved (Change of substantial security measure etc.)

Please apply for Additional Audit for verification of the amended part of the SSP, if the verification is required not later than the due date. Generally, the Audit shall be limited to the scope of amended part of the SSP.

8.5 Other additional audit

8.5.1 Additional Audit for Change of Ship's Name

When a ship's name has been changed, generally, the Auditor is to visit the ship to conduct an Additional Audit. During this Additional Audit, the Auditor is to verify that the Registry Certificate and the Statutory Certificates have been changed appropriately. Where the ship's name is to be included in the transmitted data of SSAS required by the flag Administration, the Auditor is to witness a ship security alert test or verify the receiving receipt for completed the test successfully.

8.5.2 Additional Audit as required by a Flag State

Flag States may require the ship to undergo Additional Audits. In this case, the Society is to inform of the extent of the Audit to the ship, in consideration of the background of Flag State's requirement.

- 8.5.3 Additional audit for verification of the installation/replacement/after repair of the Ship Security Alert System
 Please refer to 8.6.2 below.
- 8.5.4 Additional Audit due to change of ship's flag
 Generally, it's required to conduct an audit for issuing Interim ISSC. However,
 it may be possible to issue an ISSC with taking over the validity of existing one
 if the following conditions are satisfied.
 - .1 No change of the management company.
 - .2 The SSP has been approved with new flag requirement.
 - .3 Management company explained 1 and 2 above to the new flag

administration and received authorization to issue the ISSC with the validity of existing certificate.

8.6 Verification of the Ship Security Alert System (SSAS) at Initial, Periodical and Additional Audit.

8.6.1 After installation or replacement of Ship Security Alert System (SSAS), a report is to be kept onboard the ship prepared by a radio technician certifying successful completion of testing in order to verify compliance with the requirement SOLAS Reg. XI-2/6 paragraph 2 to 4 (Note 3). However, in case of Self-Contained SSAS ("SSAS-SC" - see Note 4), such a report can be prepared by an SSO after relevant testing.

Note 3 SOLAS Reg. XI-2/6

- *The ship security alert system, when activated, shall:*
 - .1 initiate and transmit a ship-to-shore security alert to a competent authority designated by the Administration, which in these circumstances may include the Company, identifying the ship, its location and indicating that the security of the ship is under threat, or it has been compromised;
 - .2 not send the ship security alert to any other ships;
 - .3 not raise any alarm on-board the ship; and
 - .4 continue the ship security alert until deactivated and/or reset.
- *The ship security alert system shall:*
 - .1 be capable of being activated from the navigation bridge and in at least on other location; and
 - .2 conform to performance standards not inferior to those adopted by the Organization.
- The ship security alert system activation points shall be designed so as to prevent the inadvertent initiation of the ship security alert.

Note 4 Self-Contained SSAS

The following definition is given in the Procedural Requirement established by IACS (PR24) " a SSAS which does not require any interface with, and/or depends on input from, radio and/or navigational equipment required by SOLAS IV and V to meet the performance standards required by SOLAS XI-2/6."

- 8.6.2 At the initial verification after installation of the SSAS, the following items will be verified:
 - a procedure for using the SSAS is incorporated into the SSP onboard. So, it's required to complete the approval of amendment to the SSP prior to the installation or replacement onboard.
 - .2 verify the report prepared in accordance with paragraph 8.6.1 above.
 - attending transmission testing or verifying receiving receipt for completed the test successfully.
 - .4 verify the requirement as per ISPS Code A/9.4.17 & A/9.4.18
- 8.6.3 At the subsequent periodical audit, (Initial, Intermediate & Renewal Audit), the following will be verified:
 - .1 examining record of maintenance, calibration & testing as required by ISPS Code A/10.1.10
 - .2 examining record of transmission testing
 - .3 verifying requirement given in ISPS Code A/9.4.17 & A/9.4.18