GOAL-BASED NEW SHIP CONSTRUCTION STANDARDS

Views on the three-year cycle for the maintenance of verification

Submitted by IACS

SUMMARY

Executive summary: This document provides IACS' views on the three-year cycle for the maintenance of verification in the draft part A of the IMO GBS verification guidelines contained in document MSC 98/WP.7; and suggestions related to other approaches, which might be proposed at MSC 99.

Strategic direction, if applicable: Other work

Output: OW 7

Action to be taken: Paragraph 6

Related documents: MSC 98/WP.7 and MSC 98/23

Introduction

1. The Committee, at its ninety-eighth session, taking into account the in-depth consideration in the GBS Working Group (GBS WG) of different approaches to the issue of frequency of maintenance of verification audits, noted that:

   .1 the GBS WG agreed to a three-year cycle for the maintenance of verification in part A of the draft revised IMO GBS verification guidelines; and

   .2 Member States and international organizations could submit proposals to the Committee on other approaches for the maintenance of verification before the adoption of the draft revised guidelines, tentatively scheduled at MSC 100.

IACS views on the three-year cycle for maintenance of verification

2. This document provides the views of IACS on the proposed three-year cycle for the maintenance of verification.
IACS believes that even if the changes are to be submitted annually, the audit of such changes (maintenance of verification) should be undertaken every three years for the following reasons:

1. the three-year cycle would allow sufficient time to conclude the verification process of a specific audit (including closure of possible non-conformities) prior to beginning the subsequent audit, thus avoiding the overlap of two consecutive verification processes, making it clear which changes have already been verified and easing the consideration by Member States at the MSC; and

2. the three-year cycle would reduce the administrative burden for all stakeholders (i.e. Administrations, classification societies, industry and IMO) owing to the establishment and management of the audit process.

IACS’ views on other approaches which might be submitted to MSC 99

IACS is ready to discuss other practicable solutions, including those based on the ideas discussed in the GBS WG during MSC 98, e.g. to focus the maintenance of verification audits on those substantive changes to the rules that have the most impact rather than adhering to a fixed time schedule, provided that the costs and other resource implications for the involved parties are minimized.

In this context, if Member States or international organizations, at MSC 99, propose further modifications to those paragraphs of the draft revised guidelines that are relevant to the maintenance audit, as shown in document MSC 98/WP.7, IACS requests the Committee to also consider the proposals provided in the annex to this document (shown as additions and deletions).

Action requested of the Committee

The Committee is invited to consider the comments and proposals provided above and take action, as appropriate.
ANNEX

PROPOSED AMENDMENTS TO THE DRAFT PART A OF THE GUIDELINES FOR VERIFICATION OF CONFORMITY WITH GOAL-BASED SHIP CONSTRUCTION STANDARDS FOR BULK CARRIERS AND OIL TANKERS (RESOLUTION MSC.296(87)) CONTAINED IN DOCUMENT MSC 98/WP.7

27. The addition of new rules or changes to rules already verified as conforming to the Standards should be processed as follows:

.1 if they are as a result of paragraph 26.1 above, each submitter should notify and make available any new rules or rule changes, including the necessary documentation regarding the completion of corrective actions for the non-conformities reported, to the Secretary-General and to all Administrations that have recognized them. The notification should include, at least (see also appendix 3):

<Partly omitted.>

.4 the Organization should aim to audit 10% of the new rules or rule changes received per sub-paragraph .2 every three years. However, the Secretary-General, supported by the IMO Secretariat, should assess the necessity to conduct an audit outside the 3-year cycle, based on the documentation received from the submitter as per sub-paragraph 2, and submit recommendations to the Committee at the earliest opportunity. The Committee should decide whether an audit outside the three-year cycle should be carried out. For the audit, the Secretary-General should establish a Team accordingly and forward the compilation of annual changes received per sub-paragraph .2 to it for consideration. The Team should conduct a preliminary review of the changes, exchange views and establish an audit plan; and provide it to the Secretary-General for submission to the Committee. The Team should exercise their professional judgement in identifying the changes to be audited. The Team conducts the audit and prepares a maintenance of verification audit report with a recommendation and provides it to the Secretary-General. Where the Team has identified a non-conformity, it should explain the reasons for reaching that conclusion. The findings of the Team should be forwarded by the Secretary-General to the Committee for further consideration and final disposition.

.5 when an Administration considers a new rule or rule change described in sub-paragraph 2 above to result in non-conformity with the Standards, it may request the Secretary-General to conduct a review of the rule or the change, respectively. The request should include supporting justification why such a review is necessary. The Secretary-General should establish a Team to assess the request of the Administration and the impact of the change(s) on conformity with the Standards, and then assess the necessity of conducting an audit outside the three-year cycle. The findings recommendations of the Team should be forwarded to the Committee by the Secretary-General, along with the request from the Administration and supporting documentation, for further consideration and final disposition.

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1 Proposed changes are shown as additions/deletions.