

MARITIME SAFETY COMMITTEE
102nd session
Agenda item 12

MSC 102/12/1
20 March 2020
Original: ENGLISH
Pre-session public release:

FORMAL SAFETY ASSESSMENT

Comments on the report of the Experts Group on Formal Safety Assessment

Submitted by IACS

SUMMARY

Executive summary: The document provides comments on the report of the Experts Group on Formal Safety Assessment (MSC 102/12) on the Procedure for identifying safety issues

Strategic direction, if applicable: Other work

Output: OW 8

Action to be taken: Paragraph 11

Related documents: III 5/15 (annex 2); C 121/D (paragraphs 3(a).4(i) and 4.4); MSC 72/16 (annex 3); MSC 93/15/2; MSC 101/10/3 and MSC 102/12

Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.1) and provides comments on the report of the Experts Group on Formal Safety Assessment, contained in document MSC 102/12, in relation to the *Procedure for identifying safety issues* (III 5/13, annex 2).

Background

2 The fifth session of III Sub-Committee agreed to the *Procedure for identifying safety issues* (the Procedure), contained in annex 2 to document III 5/15. The Procedure aims to prioritize safety issues using a risk ranking method. Document MSC 101/10/3 (IACS) raised concerns on the risk matrix and the risk assessment criteria utilized to prioritize the safety issues and recommended that the Procedure be reviewed by the Experts Group on Formal Safety Assessment (FSA-EG). Consequently, MSC 101 agreed to refer the Procedure to FSA-EG for review and comments.

3 In reviewing the Procedure, and as reported in paragraph 14 of document MSC 102/12, FSA-EG agreed as follows:

- .1 the risk assessment criteria in the Procedure (III 5/15, annex 2) were considered inappropriate; and
- .2 the Procedure, as it currently stands, does not serve its purpose of use as a risk assessment to prioritize the identification of safety issues for urgent action and should be improved, taking into account the comments set out in paragraph 13 above."

4 Paragraph 13 of document MSC 102/12 states:

"13 Having concurred with the concerns raised, in principle, the Group noted the following views:

- .1 the colours used in the risk matrix were considered to be misleading and should be removed for consistency with appendix 4 of the Revised FSA Guidelines;
- .2 the severity and risk assessment criteria in paragraphs 7 and 8 of the Procedure were considered inappropriate;
- .3 IACS's concerns could be reflected in a submission to the Committee, supported by concrete modification proposals;
- .4 identification of safety issues should not be based on a single accident, rather, it should take into account all available statistics and frequency;
- .5 the "Initial Ranking of Accident Scenarios" (MSC 72/16, annex 3) could provide guidance on the selection of decision parameters;
- .6 examples on how to use the Procedure could be included for better implementation;
- .7 the scope and purpose should be clearly indicated in the Procedure; and
- .8 recalling that the Council agreed, in principle, that a performance indicator on safety should be included in the Organization's Strategic Plan 2018-2023 during the review later in the current biennium, this could possibly contribute to the identification of safety issues (C 120/D, paragraph 4.4)."

Discussion

5 IACS appreciates the intention to prioritize and identify safety issues for further consideration by the Committee. In this regard, IACS agrees with the observations of the FSA-EG. To contribute further to this task, IACS has the following additional views.

6 From the Procedure agreed by III 5, IACS understands that the identification of safety issues is principally based upon the outcome of the review of accident investigation reports made available to the Correspondence Group on Analysis of Marine Safety Investigation Reports annually. The outcome of this review would depend upon the number of investigation reports and the number of volunteer analysts. The reports typically span multiple categories of accidents for various years across multiple ship types and there appears to be no criterion for selecting the reports for review.

7 An important factor is that all serious accidents may not have investigation reports uploaded and thus may not be considered under the above Procedure. Under-reporting of accidents is also another important factor (MSC 93/15/2, paragraphs 6 to 11). Although accident investigation reports provide useful data, they alone should not be used to identify safety issues, as stated in paragraph 13.4 of document MSC 102/12.

8 For identification of safety issues, it is essential to define an appropriate scope, as specified in the *Revised guidelines for formal safety assessment (FSA) for use in the IMO rule-making process* (MSC-MEPC.2/Circ.12/Rev.2, paragraph 4.1). Typically, such scope should include criteria for ship parameters (type, date of build, size etc.) and the accidents (date, type, severity etc.). A holistic analysis is then required to be performed which considers all available data. Such analysis would require efforts in terms of time and expertise. If risk ranking is contemplated to be used to prioritize the actions on safety issues, then IACS would remind of its earlier proposal in paragraph 6 of document MSC 101/10/3 that the criteria be derived using annex 3 to document MSC 72/16 (Norway).

9 IACS also supports the view in paragraph 13.6 of document MSC 102/12, which proposes the inclusion of documented examples of how the Procedure is envisaged to be utilized. This will help promote better understanding of the use of the Procedure, and also potential enhancements/refinements.

10 Furthermore, IACS understands that the Secretariat has been tasked by the Council to provide additional results on the performance indicators for safety (C 121/D, paragraph 3(a).4(i)) to the Council in 2020. IACS has been in contact with the Secretariat and has communicated its intent to support the Secretariat in this task. IACS is of the view that this task is well connected with the identification of safety issues, since it involves similar analyses.

Action requested of the Committee

11 The Committee is invited to note the discussion in paragraphs 5 to 10 and to take action, as appropriate.
