

MARITIME SAFETY COMMITTEE  
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Agenda item 7

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## GOAL-BASED NEW SHIP CONSTRUCTION STANDARDS

### Comments on document MSC 102/7/4

#### Submitted by IACS

#### SUMMARY

*Executive summary:* This document provides IACS' understanding and comments on document MSC 102/7/4, in order to facilitate the Committee's consideration of that document

*Strategic direction, if applicable:* Other work

*Output:* OW 7

*Action to be taken:* Paragraph 14

*Related documents:* MSC 102/7/4 and MSC 102/INF.24

#### Introduction

1 This document provides information and comments in relation to document MSC 102/7/4 (Secretariat).

#### Background

2 Document MSC 102/7/4 contains observations of the GBS audit teams who have performed the second GBS maintenance of verification audit of 11 recognized organizations and IACS' CSR and the re-verification of DNV-GL's ship construction rules.

#### Discussion

3 Paragraphs 10, 15 and 24 of document MSC 102/7/4 refer to the Functional Requirement (FR) "Rule Transparency" and suggests that this Functional Requirement is relevant to the issues discussed in those paragraphs. However, those aspects are not included in resolution MSC.454(100) on *Revised guidelines for verification of conformity with goal-based ship construction standards for bulk carriers and oil tankers* (herein referred to as "GBS Guidelines"). The GBS Guidelines refer only to the FR "Design Transparency" which

requires measures and provisions to keep the design process itself transparent, similar to the FR "Construction Quality Procedures" for the construction process. Therefore, the arguments in paragraphs 10, 15 and 24 of document MSC 102/7/4 are not considered relevant.

4 Paragraph 12 of document MSC 102/7/4 states:

"It is worth noting that during the maintenance audits no systematic check of outstanding observations has been carried out as it was not required by the audit procedure, which only requires the audit of the 10% of the rule changes without considering their relationship with earlier audits. In light of the above, it is noted that no mechanism for the verification of the actions taken to address the observations raised during an audit currently exists. Hence, some audit teams are simply not aware of earlier observations to audited rule sets or to audited rule changes, and this may have led to different rule interpretations and findings' categorization."

5 IACS is of the opinion that paragraphs 32 to 35 of the GBS Guidelines provide clear procedures to audit the measures taken to address observations during maintenance of verification audits. Moreover, in the IACS self-assessment package, the rule changes which were made following an observation from previous audits are clearly identified. Therefore, as no explicit feedback is provided in the audit reports towards observations indicated as addressed in the self-assessments, the observations should be considered as closed.

6 Paragraph 13 of document MSC 102/7/4 states:

"As an example of the consequences of the above-mentioned issues, it should be noted that no formal consideration of whether observation IACS/2015/FR1-8/OB/05 has been properly addressed or not has been carried out. Cross-checks among IACS members may reveal that, because of differences in FE analyses, different scantlings are approved according to the same CSR rules using different FE software and implementation requirements. This is not reasonable as the same rule text must lead to the very same scantling requirements for rules currently in force."

7 IACS is of the view that in line with the GBS philosophy of GBS being "rules for rules", the ship design and construction rules, and the relevant changes introduced, should be verified and audited for compliance with the GBS. The scantlings and the use of software, being the outcome of rule application, are out of scope of GBS requirements and hence not subject to the audit, and therefore should not be discussed during GBS audits. It is the responsibility of an individual classification society recognized by the Administration to check whether the scantlings are in compliance with the rules, which were determined by the Maritime Safety Committee to be in conformity with GBS requirements.

8 Paragraphs 7 to 9 of document MSC 102/7/4 provide the views of the audit team on the standardization of the audit process, while paragraph 29.2 requests the Committee's consideration for a more standardized reporting of rule changes. While the current tools of reporting the rule changes (tables, lists of changes, etc.) could be further improved, the use of single common text-editing software is not supported due to its impracticality on the basis that the rule text creation and adoption procedures of each submitter may significantly differ.

9 Paragraph 17 of document MSC 102/7/4 states:

"It is currently impossible to understand the present situation of submissions from IACS and members across many Committee meetings. A central summary database is needed, which is adequately conceived and organized according to GBS Guidelines and auditors' needs, showing at least the actual up-to-date situation, outstanding items, agreed corrective actions, timescales and the Committee's acceptance of the corrective actions."

10 Regarding this matter, it is worth noting that the submissions are available at the internal area of IMODOCS website in terms of particular year. Also, document MSC 102/INF.24 lists all the findings from GBS audits. Considering the available transparency and resources, IACS believes that the current situation looks far from "impossible".

11 Paragraphs 20, 21 and 29.5 of document MSC 102/7/4 mention the implementation of IACS documents by individual classification societies. The development process within IACS is clearly documented and followed up. However, it is important to note that implementation of IACS documents into individual sets of rules is the responsibility of individual IACS Member Societies.

12 Paragraph 28 of document MSC 102/7/4 includes a statement about the "apparent lack of objectivity of some self-assessments", however does not provide any examples. In IACS' view such statements should be based on objective evidence in order to understand the reasons behind the opinion. Moreover, the subsequent suggestion to perform the audit in two stages will further complicate the audit process with no obvious improvement in terms of transparency but with additional burdens for both the auditors and submitters.

13 In general, the document refers to IACS and IACS Member societies and to related IACS CSR rules. It is worth noting that GBS audit may also be performed for non-IACS Member societies.

#### **Action requested of the Committee**

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

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