

MARITIME SAFETY COMMITTEE
109th session
Agenda item 4

MSC 109/4/4
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GOAL-BASED NEW SHIP CONSTRUCTION STANDARDS

IACS comments on document MSC 108/INF.14 regarding the newly proposed table format (paragraph 12 and annex 2)

Submitted by IACS

SUMMARY

Executive summary: This document provides comments on the newly proposed table format used for the GBS Maintenance Audits in document MSC 108/INF.14.

Strategic direction, if applicable: 7

Output: 7.24

Action to be taken: Paragraph 10

Related document: MSC 108/INF.14

Introduction

1 Document MSC 108/INF.14 (Secretariat) reported, inter alia, the discussion during the second Goal-based standards (GBS) Workshop held on 12 June 2023, on the table for rule change reporting, as follows:

"11 Subsequently, the workshop participants agreed that the table set out in annex 2 may be used to facilitate the work of the auditors, ..."

2 In that respect, paragraph 12 of document MSC 108/INF.14 mentions the agreement by classification societies to further investigate the feasibility of the newly proposed table format, for rule change reporting, as follows:

"12 In order to allow sufficient time to liaise with the relevant departments, classification societies agreed to further investigate the feasibility of the newly proposed table format, for rule change reporting during the first half of 2024, and to report to MSC 109 the final outcome of this consultation process which is expected to result in an agreed final table format for rule change reporting."

Discussion

3 IACS has consulted with its members and would like to provide comments and suggestions on the newly proposed table format.

General comments and suggestions

4 IACS understands that the newly proposed table format will be applied for the next three-year cycle (2025-2027) with the Maintenance Audit in 2028, with the submission due date for the first package being 31 March 2026.

5 It is the understanding of IACS that the newly proposed table format will be applied for both submission packages, i.e. for the common submission package of all IACS members, as well as for the individual submission packages of each classification society. In this regard, IACS proposes to add a new column to the table for use in the individual submission packages containing references to the IACS resolutions, including IACS Common Structural Rules, if any. This proposal is indicated in the draft table given in the annex.

6 After consultation with its members, IACS reached the view that hyperlinking to rule references or additional documents provided for explanations, therefore justification should not be provided. Considering the different rule development environments used by IACS members, the provision of hyperlinks would add further administrative burden on the submitter. Furthermore, due to the transfer of the files to the IMO Space, the proper functioning of these hyperlinks cannot be ensured. This might cause further confusion and work during the audit process. The proposed table format was changed accordingly, as set out in the annex.

7 Item 2 of the newly proposed table format contains a reference to the submission cycle by providing a selection list of the annual submission year. IACS would like to suggest replacing this item by the submission year or adding the submission year and indicating the submission cycle more clearly, e.g. by indicating the three-year cycle, to avoid misunderstandings.

8 Furthermore, to improve simplicity for the submitters, as well as for the audit team, IACS would like to suggest adding a column containing the justification text. As a description of the impact on and/or contribution to safety, security or environmental protection is already provided in column [9] of the newly proposed table, IACS expects that the justification text can be kept brief in most of the cases. If more detailed justification is necessary, a reference to a separate file can be given, similar to for columns [9] and [10].

9 Additional editorials and corrections are provided by IACS in the draft table given in the annex.

Action requested of the Committee

10 The Committee is invited to consider the foregoing and suggestions in the annex, and to take action, as appropriate.

ANNEX

DRAFT TABLE FORMAT WITH IACS COMMENTS AND CORRECTIONS

<p style="text-align: center;">FORMAT FOR RULE CHANGE COMMUNICATION * * to be submitted by IACS/ROs as part of maintenance audit</p>										
<p>1 Recognized Organization Information IACS Contact person and e-mail: Mr/Ms xxx The justification for the below rule changes are set out in the accompanying submission report.</p>										
<p>2 Submission cycle/year 2028 3rd year (final) Submission</p>										
<p>3.2 Scope of submission Provide list of previous submissions for the three-year cycle since the last verification audit</p>										
1.) 1st package for the 3-year cycle (2025-2027) as part of the 4th (2028) Maintenance Audit, submitted on 31 March 2026 (IMOSPACE upload), cover letter reference XXXX-XX (if applicable), total of xx files										
2.) 2nd package for the 3-year cycle (2025-2027) as part of the 4th (2028) Maintenance Audit, submitted on 31 March 2027 (IMOSPACE upload), cover letter reference XXXX-XX (if applicable), total of xx files										
No.	Rule set / document	Revision No.	Rule change reference	Reference to IACS resolution	Revision History (Cat 3 changes only) (since 31 March 2022)	Rule change CATEGORY	FR reference of documentation in req./ evaluation crit.	Impact on net/gross scantling	Brief description on the impact on and/or contribution to safety, security or environmental protection	Short description of change (if applicable - click reference below to open separate document)
[1]	[2]	[3]	[4]	[5]	[5]	[6]	[7]	[8]		[10]
1	IACS CSR	Rev X	Pt 1, Ch 1, Sec 1, [1.2.1]		Rev. X-1 of 1 April 2023	1	FR 1.1	no		Length L replaced by freeboard length L _{LL}
2	IACS CSR	see above	Pt 1, Ch 1, Sec 1, [1.3.1]		see above	1	FR 1.2	no		see above
3	IACS UI SC259	Rev 2	section 2, par. 2.3			1	FR 5.5.1	no		revised formula for xx
4	IACS Rel 132	i. n. a.				2	FR 1.2, FR 2.3, FR 3.4	no		new GBS technical documentation, all text to be considered by Audit
<p>Additional explanations for columns</p>										
[3]	The revision number is for the document or rule set listed in column [2], regardless if the change is GBS-relevant or not									
[6]	The revision history (after 31 March 2022 (3rd GBS Maintenance Audit)) to the particular rule in question [4] should be listed here									
[5]	Reference to IACS Common Structural Rules or other IACS resolutions, if any. Here the specific reference to the rule change is required, ideally as a hyper-reference i.e. specific article, paragraph or section, as applicable. References to whole documents should be avoided (except in case of new document or complete revision).									
[4-7]	As per res. MSC.454(100), par. 5.21									
[7]	Reference to documentation requirement and /or evaluation criteria as per res. MSC.454(100), part B									
[9-10]	The description may be provided in a separate file (to be referred to hyperlinked)									
[10-11]	In addition to the short description, a separate file may be provided with additional information on the change (further information on the rule change justification can also be found in the rule change submission report, which may <u>may</u> also be referred to <u>linked</u> in this column)									