



## GOAL-BASED NEW SHIP CONSTRUCTION STANDARDS

### Comments on document MSC 111/4/2

#### Submitted by IACS

#### SUMMARY

<i>Executive summary:</i>	This document comments on document MSC 111/4/2 (Secretariat) containing the comments and suggestions of the Audit Team.
<i>Strategic direction, if applicable:</i>	7
<i>Output:</i>	7.24
<i>Action to be taken:</i>	Paragraph 12
<i>Related document:</i>	MSC 111/4/2

#### 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.6) and it comments on document MSC 111/4/2 (Secretariat) containing the comments and suggestions of the Audit Team.

#### Background

2 Document MSC 111/4/2 reports on the comments and suggestions of the Audit Team related to the audit process raised during the GBS verification audit in accordance with paragraph 11.10 of the *Revised guidelines for verification of conformity with goal-based ship construction standards for bulk carriers and oil tankers* (resolution MSC.454(100)).

#### Discussion

3 IACS has consulted with its members and submits the following comments on document MSC 111/4/2.

#### **Comments on compelling need for improvements in maintenance audit submissions (paragraphs 3 to 8 of document MSC 111/4/2)**

4 IACS notes that several of the issues highlighted in document MSC 111/4/2 were also discussed during the GBS workshop held in December 2025 and are reflected in the report from that workshop (MSC 111/INF.2).

5 In particular, matters such as the development of the harmonized summary tables for reporting rule changes and the possible use of hyperlinks in submission packages were discussed at the workshop. With regard to the harmonized summary tables, IACS understands that practical convergence has already been achieved through the rule change reporting table finalized during the workshop and currently being used in preparation of the first submission package for the 2026-2028 three-year maintenance audit cycle.

6 Regarding a possible use of hyperlinks to facilitate the identification of rule changes, IACS considers that such tools may be useful in supporting the review process. At the same time, consistent with the discussions held during the workshop, their use should remain voluntary and should not constitute a mandatory requirement.

7 Furthermore, any harmonized method intended to facilitate the identification of rule changes should not imply an obligation for recognized organizations (ROs) to modify their internal rule development processes, which are outside the scope of the GBS verification.

8 IACS also notes that the recommendation in paragraph 8.1 of document MSC 111/4/2 refers to the inclusion of a "road map" of the rules. In this regard, clarification of the meaning and intended scope of such a "road map" would be necessary.

***Comments on effective implementation of audited rules (paragraphs 9 to 13 of document MSC 111/4/2)***

9 With regard to paragraphs 10 and 14.2 of document MSC 111/4/2, IACS understands the importance of the implementation of audited rules. On the other hand, IACS also notes that the purpose, scope and methodology of maintenance verification currently specified in the revised verification guidelines do not cover the implementation of the audited rules.

10 In this context, IACS considers that implementation of audited rules should not be addressed within the framework of the GBS verification process, since it is already covered by the flag States' oversight and audit of their ROs, as required by the RO Code and verified under the IMO Member State Audit Scheme.

11 With regard to paragraphs 12 and 14.3 of document MSC 111/4/2:

- .1 A formal procedure for software cross-checks has already been developed by IACS in addressing observation IACS/2015/FR1-8/OB/05. IACS has issued an internal "Instruction for carrying out software cross check for CSR", which was reported in the submission package for the first three-year cycle maintenance audit in 2022. As there are no specific findings or comments reported in the related audit report, observation IACS/2015/FR1-8/OB/05 regarding software cross-checks is considered to have been addressed and closed in IACS's understanding.
- .2 While IACS understands that for the application and approval of the complex CSR requirements, proper software solutions might be necessary, IACS does not consider software validation to be in the scope of the GBS framework.

**Action requested by the Committee**

12 The Committee is invited to note the information and to take action, as appropriate.