

MARITIME SAFETY COMMITTEE
101st session
Agenda item 10

MSC 101/10/3
8 April 2019
Original: ENGLISH
Pre-session public release:

IMPLEMENTATION OF IMO INSTRUMENTS

Comments on the Procedure for identifying safety issues

Submitted by IACS

SUMMARY

Executive summary: This document provides comments on section 4 of the report of III 5 (III 5/15), in particular, on the Procedure for identifying safety issues (III 5/15, annex 2)

Strategic direction, if applicable: 6

Output: 6.4

Action to be taken: Paragraph 11

Related documents: MSC 72/16; III 5/4, III 5/15; MSC 101/10 (paragraph 2.19) and MSC-MEPC.2/Circ.12/Rev.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.1) and provides comments on document MSC 101/10 (Secretariat). The Committee is invited in paragraph 2.19 of document MSC 101/10 to approve the report of III 5 (III 5/15) in general. IACS notes that paragraph 4.24 of document III 5/15 reports the Sub-Committee "agreed to the Procedure for identifying safety issues, as set out in annex 2."

Background

2 IACS provided comments in the Working Group on Analysis of Marine Safety Investigation Reports that was established at III 5 regarding the draft Procedure for identifying safety issues (hereinafter referred to as "the Procedure"), which had been developed by the Correspondence Group on Analysis of Marine Safety Investigation Reports (III 5/4, annex 3). However, IACS considers its comments were not taken into account in the version of the Procedure that was finalized at III 5. Consequently, and with a view to enhancing its utility and transparency and to facilitate its global and consistent use (reproducibility), IACS offers the following comments on the Procedure provided in annex 2 to document III 5/15.

Discussion

Criteria for carrying out risk assessment

3 While IACS recognizes the use of a risk assessment to prioritize identification of safety issues for urgent action, it considers it is important to establish a clear and unambiguous basis for triggering such a risk assessment. Therefore, IACS considers that criteria also need to be developed on which accident(s) are to be selected (i.e. when the accident occurred, frequency and consequences in terms of injuries, fatalities, environmental and material consequences) for identifying safety issues. Thus, the scope of the risk assessment should be made clear and concise in the Procedure (see also paragraph 4.1 of the FSA Guidelines (MSC-MEPC.2/Circ.12/Rev.2)).

Risk acceptance criteria

4 IACS would like to highlight a major concern regarding the application of the risk acceptance criteria, as discussed in paragraphs 8, 12 and 13 of the Procedure. Using these criteria in their present form, a "reasonably probable" accident (occurring once per year in a fleet of 10 ships) with "severe consequences" (a fatality or multiple severe injuries, severe material damage and severe damage to the environment) is not considered as requiring "urgent action". Consequently, a safety issue occurring once per year in a fleet of 10 passenger ships, which results in a fatality or multiple severe injuries, severe material damage or severe damage to the environment, does not necessitate "urgent action" if the Procedure, as written, is applied.

5 In considering paragraph 4.24.2 of document III 5/15, IACS is of the view that a "risk rating" of nine, corresponding to one fatality per ship year, should be judged "intolerable".

6 IACS is also of the view that a "of 7 or above (for a single hazard) should call for", considering that according to the Procedure an accident is composed of several hazards (paragraph 4 of the Procedure). In this context, IACS refers to annex 3 of document MSC 72/16, which provides guidance on selection of such decision parameters. This document is also referred to in the FSA Guidelines and other major FSA studies.

7 In addition to the aforementioned concerns, IACS doubts whether the conclusion in paragraphs 12 and 13 of the Procedure, that the ranking of the safety issue in accordance with the obtained risk rating is a "proposed instruction" for the analyst and may "at all times" be replaced by "other action if so decided". In the view of IACS, this could impact the reproducibility of the results, as "other action if so decided" is a subjective term. IACS considers that the purpose of risk assessment is to determine the appropriate actions to be taken. From this point of view, IACS considers that those actions should be determined objectively, based on the outcome of assessments carried out in accordance with established acceptance criteria.

Risk assessment experts

8 IACS wishes to point out that the table in paragraph 8 of the Procedure, in its present form, and the associated risk acceptance criteria may possibly be taken as a precedent by other sub-committees and used for risk assessments. IACS, therefore, recommends that a review of the table should be undertaken by risk assessment experts (see also paragraph 10 below).

9 It appears that the Correspondence Group on Analysis of Marine Safety Investigation Reports or, exceptionally, the Working Group on Analysis of Marine Safety Investigation Reports, (paragraph 1 of the Procedure) or an analyst (paragraphs 11 and 12 of the Procedure) can be tasked to perform a risk assessment. IACS considers that risk assessments should be carried out by a team of appropriate experts with adequate domain knowledge and skill in order to ensure the credibility, comprehensibility, transparency and reproducibility of the risk assessment.

Proposal

Review of the Procedure by FSA experts

10 It is important that the Procedure provides an output which is unambiguous and reproducible. Since the Procedure draws upon risk assessment techniques to prioritize action on identified safety issues, it is important that it should be reviewed by experts that have a deep understanding and knowledge of undertaking risk assessments. IACS is of the opinion that the IMO Experts Group on Formal Safety Assessment has the required competence to undertake such a task and should be tasked to review the Procedure and make recommendations, if any, regarding its improvement and application.

Action requested of the Committee

11 The Committee is invited to note the discussion in paragraphs 3 to 9 above, to consider the proposal in paragraph 10 above, and to take action as appropriate.
