

SUMMARY OF DECISIONS
3rd MEETING OF THE AD HOC STEERING GROUP
FOR REDUCING ADMINISTRATIVE REQUIREMENTS (SG-RAR)
14 and 15 January 2013

The SG-RAR, which met on 14 and 15 January 2013 at IMO Headquarters with two members participating via audio link (see annex 1 for participation):

- 1) Agreed to the agenda, as set out in SG-RAR/16.
- 2) Agreed that the inventory in C 108/INF.2 should be updated with the administrative requirements, as set out in annex 2, and that this should be considered as the final inventory to be used in the consultation. Further the SG-RAR thanked Mr. Kubota for the work carried out on the SOLAS requirements, as well as the comments from Mr. Jørgen Rasmussen conveyed by Ms Knudsen.

Annex 2 also includes the previously agreed additional requirements for STCW, as well as newly identified missing requirements for both SOLAS and MARPOL.

Agreed to not include resolutions A.739(18) and A.789(19) in the inventory, as well as the Protocol of 2002 to the Athens Convention relating to the Carriage of Passengers and their Luggage by Sea, 1974¹, as that instrument was not yet in force.

Furthermore, the SG-RAR acknowledged that the inventory might lack some requirements and that there could be debate about the distinction between "administrative" and "operational" requirements, but further agreed that the consultation should go ahead, and that there should be a possibility for stakeholders to identify missing requirements – and the SG-RAR would then have to decide how to manage these at a later point.

- 3) Regarding the design of the consultation website:
 - .1 agreed that both an Adobe and internet-based solution will be used to give the greatest amount of flexibility;
 - .2 noted with appreciation that Mr. Juhl's organization had agreed to cover the Adobe cost for a two-year period;
 - .3 agreed to the text for the pop-up boxes on the mandatory instruments (paragraphs 6-7 and annex 1 of document SG-RAR/18);
 - .4 agreed not to use the definitions of stakeholders set out in SG-RAR/18, annex 2;
 - .5 agreed – in principle - to the provisional draft text for the consultation website as amended in annex 3, but with the understanding that it could only be finalized once agreement on the consultation process had been reached, and that the Chairman and Mr. Loldrup should update as required;
 - .6 agreed to the following the grouping of stakeholders in the upper line of the consultation matrix:

GOVERNMENT/ ADMINISTRATIONS
- administration

¹ As a consequence 'REIO' is no longer relevant as a stakeholder.

- coastal state
 - contracting government
 - flag state
 - investigating state
 - party
 - port state
 - PSC officer
 - Public authority
 - Registry
- IMO SECRETARY-GENERAL/SECRETARIAT
SURVEYOR/RO
- Nominated surveyor
 - Recognized organisation
- SHIP'S MANAGEMENT
- Company
 - Owner
 - Master
 - Ship's crew*
- OTHER
- Arbitration
 - Coating inspector
 - Manufacturer
 - Shipper
 - Shipyard
 - No specific stakeholder**

* Mr. Juhl was requested to look into the possibility of having two columns for master and ship's crew in the matrix. However, a fall-back position could be listing them as "master/ship's crew" with the possibility of specifying the respondent's role in the consultation document

** The column under this heading should specify the total number of requirements for the relevant instrument and allow a stakeholder to download all consultation forms relating to this instrument – relevant text should be included that it would be beneficial to use the internet-based consultation for this due to the potential size of the pdf-files.

- .7 agreed to the listing/grouping of mandatory instruments in annex 4 of SG-RAR/18, but with the removal PAL PROT from the inventory, as that instrument was not yet in force;
- .8 agreed to not include resolutions A.739(18) and A.789(19) in the list of mandatory instruments;
- .9 agreed to the consultation matrix in general (as set out in SG-RAR/18, annex 4) taking into account the decisions in the preceding paragraphs;
- .10 agreed to revisit the issue of the feedback to be provided to respondents, including the question whether the final report of the SG-RAR should be made publicly available;

- .11 agreed in principle to postpone the date of launch for the consultation until April, taking into account the considerable efforts and time still needed to finalize the consultation website; and
 - .12 expressed its deep appreciation for the extensive work carried out by Mr. Juhl.
- 4) Regarding the consultation document (set out in annex 4) it was agreed to finalise it by correspondence, based on the following principles:
- .1 that personal information would not be available to review for anyone else (including Council and committees) than the SG-RAR to ensure that a wide range of stakeholders (especially individuals) would be comfortable with submitting information, and agreed to inform the Council accordingly; and
 - .2 Anyone submitting responses officially on behalf of an organisation, agency etc. should be mandated to identify him- or herself, whereas anonymous submissions from individuals could be accepted.
- 5) Regarding the consultation process
- .1 it was agreed that it would be preferred to conduct the consultation in one batch;
 - .2 it was agreed to aim at launch of the consultation in April 2013 being mindful of the substantial work still ahead in the development of the website;
 - .3 it was agreed that a six month period would be appropriate for consultation, possibly with the need for a reminder after an interim review half-way through the process;
 - .4 it was agreed that the modalities for the analysis of responses should be further considered at the next meeting, but members were urged to read document SG-RAR/17 well in advance of that meeting, as it provides essential context information for the work to be finalized by correspondence; and
 - .5 Mr. Terminella invited members to give their views on the analysis phase, if possible in advance of the next meeting.
- 6) Regarding the draft communication plan, the SG-RAR expressed its appreciation to Ms Plott for the draft, and in general agreed to the plan, noting that the Secretary-General in principle had agreed to be the figurehead of the promotion, with some modifications including the one batch consultation and the key messages.
- Regarding the draft circular letter, it was agreed to finalize the circular letter (as set out in SG-RAR/21) by correspondence bearing in mind that dates could only be filled in, when the consultation process was in place.
- 7) Regarding the SG-RAR's work plan it was agreed that the Chairman would prepare a revised work plan, based on the decisions regarding the consultation process, to be annexed to the Group's report to Council 110
- 8) Regarding the next meeting, the provisional date would be the Thursday 7 March 2013, where a full-day meeting would be envisaged.

ANNEX 1

LIST OF PARTICIPANTS

Mr. John Akhurst

Dr. Christos Atalianis (14 January 2013 only)

Captain Ike Enriques

Mr. Jeppe Juhl

Mr. Hyuntae Kim (14 January 2013 only)

Mr. Bjørn Erik Kristoffersen

Mr. Hideo Kubota (accompanied by Mr Shin Imai)

Mr. Jesper Loldrup (accompanied by Ms Naomi Fraser)

Captain Khalid Loudiyi (on behalf of Mr. Mohamed Marzagui)

Mr. Ali Akbar Marzban

Ms Angela Plott (participating remotely)

Mr. Kees Polderman

Ms Anne Skov Strüver (accompanied by Ms Helle Knudsen)

Mr. Jun SUN

Mr. E.J. Terminella (participating remotely)

Mr. David Tongue

Ms Katy Ware

Regrets:

Captain Jorge Imhoff

Mr. Dumisani T. Ntuli

ANNEX 2

**INVENTORY OF ADMINISTRATIVE REQUIREMENTS
IN IMO MANDATORY INSTRUMENTS
(ITEMS TO BE ADDED TO THE INVENTORY)**

ADDITIONAL REQUIREMENTS IDENTIFIED BY MR. KUBOTA AND AGREED AT THE MEETING

Ref.	Requirement	Type	Burden on?	Comments
SOLAS 1974 as amended				
Regulation II-1/3-7.1	A set of as-built construction drawings and other plans showing any subsequent structural alterations shall be kept on board a ship constructed on or after 1 January 2007.	Recording	Shipowners/Shipbuilders	Continuous
Regulation II-1/3-7.2	An additional set of such drawings shall be kept ashore by the Company, as defined in regulation IX/1.2.	Recording	Companies	Continuous
Regulation II-1/3-10.4	A Ship Construction File with specific information on how the functional requirements of the Goal-based Ship Construction Standards for Bulk Carrier and Oil Tankers have been applied in the ship design and construction shall be provided upon delivery of a new ship,	Provision of information to masters	Shipbuilders	One-off and then continuous updating
Regulation II-1/3-10.4	and kept on board the ship and/or ashore and updated as appropriate throughout the ship's service.	Recording	Companies and masters	Continuous
Regulation II-1/55.3	The engineering analysis shall be prepared and submitted to the Administration, based on the guidelines developed by the Organization, and shall include, as a minimum, the following elements: ...	Provision of information to Administrations	Companies	Continuous
Regulation II-1/55.4.2	A copy of the documentation, as approved by	Recording	Companies and masters	Continuous

Ref.	Requirement	Type	Burden on?	Comments
	the Administration, indicating that the alternative design and arrangements comply with this regulation shall be carried on board the ship.			
Regulation II-1/55.5	The Administration shall communicate to the Organization pertinent information concerning alternative design and arrangements approved by them for circulation to all Contracting Governments.	Provision of information to IMO	Administrations	Continuous
Regulation II-2/ 20.6.1.4.1.2.2	any operation of valves referred to in paragraph 6.1.4.1.2.1 shall be recorded in the log-book;	Recording	Masters	Continuous
Regulation III/20.7.2	Inspection of the life-saving appliances, including lifeboat equipment, shall be carried out monthly using the checklist required by regulation 36.1 to ensure that they are complete and in good order. A report of the inspection shall be entered in the log-book.	Recording	Masters	Continuous
Regulation III/20.8.5	An Administration which permits extension of liferaft service intervals in accordance with paragraph 8.3 shall notify the Organization of such action in accordance with regulation I/5(b).	Provision of information to IMO	Administrations	Continuous
Regulation III/38.3	The engineering analysis shall be prepared and submitted to the Administration, based on the guidelines developed by the Organization, and shall include, as a minimum, the following elements: ...	Provision of information to Administrations	Companies	Continuous
Regulation III/38.4.2	A copy of the documentation, as approved by the Administration, indicating that the alternative design and arrangements comply with this regulation shall be carried on board the ship.	Recording	Companies and masters	Continuous

Ref.	Requirement	Type	Burden on?	Comments
Regulation III/38.5	The Administration shall communicate to the Organization pertinent information concerning alternative design and arrangements approved by them for circulation to all Contracting Governments.	Provision of information to IMO	Administrations	Continuous
Regulation V/14.3	On all ships, to ensure effective crew performance in safety matters, a working language shall be established and recorded in the ship's log-book.	Recording	Masters	Continuous
Regulation V/18.8	The voyage data recorder system, including all sensors, shall be subjected to an annual performance test. A copy of the certificate of compliance issued by the testing facility, stating the date of compliance and the applicable performance standards, shall be retained on board the ship.	Recording	Masters	Continuous
Regulation V/18.9 A copy of the test report shall be retained on board the ship.	Recording	Masters	Continuous
Regulation V/28.1	All ships engaged on international voyages shall keep on board a record of navigational activities and incidents which are of importance to safety of navigation and which must contain sufficient detail to restore a complete record of the voyage, taking into account the recommendations adopted by the Organization. When such information is not maintained in the ship's log-book, it shall be maintained in another form approved by the Administration.	Recording	Masters	Continuous
Regulation VII/8 Each draught and tonnage observation shall be recorded in a cargo log-book.	Recording	Masters	Continuous
Regulation VII/4.5	Each ship carrying dangerous goods in packaged form shall have a special list or	Recording	Masters	Continuous

Ref.	Requirement	Type	Burden on?	Comments
	manifest setting forth, in accordance with the classification set out in the IMDG Code, the dangerous goods on board and the location thereof.			
Regulation VII/4.5 A copy of one of these documents shall be made available before departure to the person or organization designated by the port State authority.	Provision of information to the port State authority	Masters	Continuous
Regulation IX/4.2	A copy of the Document of Compliance shall be kept on board the ship in order that the master can produce it on request of verification.	Recording	Companies and Masters	Continuous
Regulation XI-2/10.3	Contracting Governments shall designate and communicate the measures required to be addressed in a port facility security plan for the various security levels, including when the submission of a Declaration of Security will be required.	Provision of information to Governments and others concerned	Contracting Governments	Continuous

CHANGES IDENTIFIED BY MR. KUBOTA AND AGREED AT THE MEETING

Regulation I/16	The certificates issued under regulations 12 and 13 shall be readily available on board for examination at all times.	To keep information on board	Companies and masters	Continuous
Regulation V/19-1.8.2	Contracting Governments shall specify and communicate to the Organization relevant details, taking into account the performance standards and functional requirements adopted by the Organization, to enable long-range identification and tracking information to be made available pursuant to the provisions of paragraph 8.1. The Contracting Government concerned may, at any time thereafter, amend or withdraw such	Provision of information to IMO	Contracting Governments	Continuous

	communication. ...			
Regulation V/19-1.8.2	... The Organization shall inform all Contracting Governments upon receipt of such communication together with the particulars thereof.	Provision of information to Contracting Governments	IMO	Continuous
Regulation V/19-1.9.2	The Administration concerned shall communicate, pursuant to paragraph 9.1, such decisions to the Organization. ...	Provision of information to IMO	Administrations	Continuous
Regulation V/19-1.9.2	... The Organization shall inform all Contracting Governments upon receipt of such communication together with the particulars thereof.	Provision of information to Contracting Governments	IMO	Continuous

ADDITIONAL REQUIREMENTS FOR STCW – AS PREVIOUSLY AGREED BY THE GROUP

Ref.	Requirement	Type	Burden on?	Comments
STCW 78				
Incl. 2010 Manila Amendments				
Regulation I/2. 11	Subject to the provisions of regulation I/10, paragraph 5, any certificate required by the Convention must be kept available in its original form on board the ship on which the holder is serving.	Recording	Companies and seafarers	Continuous
Regulation I/2.13	13 Candidates for certification shall provide satisfactory proof: .1 of their identity; .2 that their age is not less than that prescribed in the regulation relevant to the certificate applied for; .3 that they meet the standards of medical fitness specified in section A-I/9 of the STCW	Provision of information to administrations	Candidates/seafarers	One-off

	Code;			
Regulation I/6	<i>Training and assessment</i> Each Party shall ensure that: .1 the training and assessment of seafarers, as required under the Convention, are administered, supervised and monitored in accordance with the provisions of section A-I/6 of the STCW Code;	[Recording]	Administrations and training institutions	Continuous

ADDITIONAL REQUIREMENTS IDENTIFIED BY MS STRÜVER AND MS KNUDSEN

Ref.	Requirement	Type	Burden on?	Comments
SOLAS 1974				
Chapter V, regulation 11.7:	The master of a ship shall comply with the requirements of adopted ship reporting systems and report to the appropriate authority all information required in accordance with the provisions of each such system.	Information administration to	Masters	Continuous
Regulation II-2/3-7	1. A set of as-built construction drawings ⁸ and other plans showing any subsequent structural alterations shall be kept on board a ship constructed on or after 1 January 2007. 2. An additional set of such drawings shall be kept ashore by the Company, as defined in regulation IX/1.2.	Recording	Companies and masters	Continuous

ADDITIONAL REQUIREMENTS IDENTIFIED BY MR. LOLDRUP AND MS FRASER

Ref.	Requirement	Type	Burden on?	Comments
MARPOL PROT 97				
Article 7.2	The Depositary shall: (a) inform all States which have signed the present Protocol or acceded thereto of: (i) each new signature or deposit of an instrument of ratification, acceptance, approval or accession, together with the date thereof; (ii) the date of entry into force of the present Protocol; and (iii) the deposit of any instrument of denunciation of the present Protocol, together with the date of which it was received and the date on which the denunciation will take effect; and (b) transmit certified true copies of the present Protocol to all States which have signed the present Protocol or acceded thereto.	Provision of information	IMO	Continuous
Annex 1, Regulation 2.6.1	... and the appropriate entry in the Oil Record Book Part II referred to in regulation 36 of this Annex is endorsed by the Competent Port State Authority.	Provision of information	Port states	
Annex 1, Regulation 3.5.2.6	The quantity, time and port of discharge are recorded in the Oil Record Book.	Recording	Master	Continuous

ANNEX 3
(Note: final version to be found in SG-RAR/23)

PROVISIONAL DRAFT TEXT FOR THE CONSULTATION WEBSITE

1. DEFINITIONS

- Administrative requirement: an obligation in a mandatory IMO instrument to provide or retain information and data;
- Administrative burden: an administrative requirement that is, or has become, unnecessary, disproportionate or even obsolete.

2. THE CONSULTATION PROCESS IN GENERAL

- The consultation will be carried out between [...] and [...] 2013.
- The intent purpose of the consultation is to collect comments relating to administrative requirements imposed by mandatory IMO instruments, to identify which requirements should be considered burdensome to those expected to comply with them.
- Contributions from everyone with interest and having an opinion and/or suggestion are welcomed.
- Responses may be given either on behalf of an organization or in a personal capacity. A non-exhaustive list of identified stakeholders will appear when you enter the dedicated consultation form.
- Responses from the consultation process will be analyzed as a part of the process. The report of the analysis will identify those administrative requirements that are perceived as a burden, and will make recommendations to the IMO Council to address these burdens, as appropriate.
- Feedback on the process will be reported (...)
- (...)

What to do to take part in the consultation?

- Go to the green "Consultation Process" button and select entry as stakeholder as well as the instrument(s) of interest in the matrix;
- Press "next" at the bottom page when you have highlighted your choices. Follow the instructions and proceed to the selected consultation form.

3. BACKGROUND INFORMATION ON THE REDUCTION OF ADMINISTRATIVE BURDENS

Strategic Plan 2012-2017

In November 2011 the IMO Assembly adopted the Organization's Strategic Plan 2012-2017 (resolution A.1037(27)). In chapter 2 (*trends, developments and challenges*) the Strategic Plan recognizes the following:

With the increase in regulatory measures for safety, security and environmental protection, there is a need to achieve an appropriate balance between the multiple objectives of the Organization – namely, safe, secure and efficient shipping on clean oceans – lest such measures unduly impact on the efficiency of shipping. The development and implementation of measures to promote the efficiency of shipping, through better regulation including the elimination of unnecessary, disproportionate or obsolete administrative requirements, is

essential in order for the shipping industry to continue to serve international maritime transportation and world trade.

The challenge for IMO is to further promote and develop measures to facilitate shipping, such as through the reduction of obstacles and formalities and the creation of enhanced systems to facilitate seaborne trade, thereby ensuring that the appropriate balance is achieved between safety, security and environmental protection and efficiency of shipping so that the flow of seaborne trade continues to be smooth and efficient.

Chapter 3 of the Strategic Plan 2012-2017 (*strategic directions*) translates this challenge for the IMO in the following strategic direction:

IMO will seek to ensure that measures to promote safe, secure and environmentally sound shipping do not unduly affect the efficiency of shipping. It will also constantly review such measures to ensure their adequacy, effectiveness and relevance, using the best available tools, thereby securing better regulation without unnecessary or disproportionate administrative requirements. The Organization will periodically review administrative provisions of existing conventions and mandatory instruments with the aim of finding improved, more efficient solutions for those administrative requirements that are necessary. Those provisions of existing conventions and mandatory instruments that have become unnecessary and/or burdensome will also be reformed and/or eliminated without compromising safety, security and the protection of the environment.

High-level Action Plan 2012-2013

In November 2011 the Assembly further adopted the High-level Action Plan of the Organization and priorities for the 2012-2013 biennium (resolution A.1038(27)). This resolution reflects the assignments of resolutions A.1037(27) and A.1043(27) in the following concrete deliverables (*planned outputs*):

- establishment of an Ad Hoc Steering Group for the Reduction of Administrative Requirements;
- creation of an inventory of administrative requirements in mandatory IMO instruments;
- identification and assessment of administrative requirements in mandatory IMO instruments that are perceived as being a burden; and
- recommendations regarding reducing or simplifying requirements in mandatory IMO instruments to be forwarded to the relevant Committees for consideration and action.

Periodic Review of Administrative Requirements in Mandatory IMO Instruments

In November 2011 the IMO Assembly also adopted a resolution on the Periodic Review of Administrative Requirements in Mandatory IMO Instruments (resolution A.1043(27)). This resolution acknowledges that facilitating better regulation is a necessary step towards releasing resources from administrative tasks for Administrations and industry alike, thus contributing to the IMO's goals of efficient regulation of safety and security of shipping and the prevention and control of pollution by ships. The resolution further emphasizes that due attention should be given to ensuring that any administrative requirements have an added value and are proportional to the desired outcome for all interested stakeholders.

By resolution A.1043(27) the 27th Assembly therefore:

- requested the Council to establish an Ad Hoc Steering Group for Reducing Administrative Requirements (SG-RAR), with appropriate terms of reference;

- requested the Council to monitor the outcome of the periodic review process and its recommendations and to send a progress report to the 28th Assembly in 2013;
- invited the Council to continue its efforts aimed at promoting the development and implementation of better regulations.

Ad Hoc Steering Group for the Reduction of Administrative Requirements (SG-RAR)

In June 2012 the IMO Council established the Ad Hoc Steering Group for the Reduction of Administrative Requirements (SG-RAR) and approved terms of reference for the SG-RAR. The SG-RAR has been composed of nineteen representatives of relevant stakeholders-interests in order to balance the different interests. The purpose of the SG-RAR is to assist the Organization in its efforts to identify and reduce administrative burdens for all stakeholders in the maritime sector.

The **terms of reference** for the SG-RAR include the following tasks:

- conduct consultations with stakeholders;
- analyse the responses from the consultations;
- identify administrative burdens;
- develop recommendations to address administrative burdens; and
- report accordingly to the Council.

The terms of reference request the SG-RAR to conduct its work with utmost transparency and to ensure proper information management, including documentation and record-keeping. In conducting the consultations with stakeholders, the SG-RAR must ensure that consultations are open and inclusive in terms of gathering views from all stakeholders. For the purposes of receiving views from the stakeholders, the SG-RAR should utilize efficient means for receiving information, such as a dedicated website. When analysing the responses the SG-RAR should clearly identify those administrative requirements that are perceived as a burden and make recommendations to the Council to address these burdens, including the rationale for any changes.

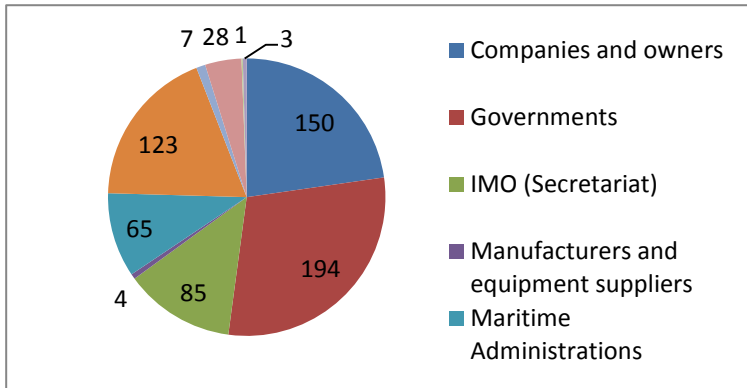
Inventory of administrative requirements in mandatory IMO instruments

The creation of an Inventory of administrative requirements in mandatory IMO instruments has been financed by the Government of Denmark, which submitted a completed Inventory to the IMO Council in June 2012. The SG-RAR considered the Inventory to be accurate and complete, and a vital basis for its further work. The Inventory has been used in the preparation of the consultation process and will be used in the analysis of responses.

The Inventory lists all the administrative requirements contained in IMO Conventions and in other IMO instruments that have become mandatory under such Conventions. In total, the Inventory identifies over 540 administrative requirements, addressing a variety of stakeholders, including:

- Companies and owners;
- Governments, in their capacity as Party to Conventions, flag, port or coastal State;
- IMO (Secretariat);
- Manufacturers and equipment suppliers;
- Maritime Administrations;
- Masters;
- Port authorities;
- Recognized organizations;
- Shipbuilders and ship repairers; and

- Shippers.



The diagram globally quantifies how the total of administrative requirements address the various stakeholders (note that many requirements address more than one stakeholder).

The Inventory also shows a variety in types of administrative requirements. They include requirements to:

- Provide information to masters;
- Provide information to companies or owners;
- Provide information to the IMO;
- Provide information to Governments or Administrations;
- Keep record of information;
- Display information on board ships.

Analysis of responses and follow-up process

The SG-RAR will collect and process the responses from the public consultation, in order to analyze the responses. When analyzing the responses the SG-RAR will identify those administrative requirements that are perceived as a burden, and will make recommendations to address these burdens, including the rationale for any changes. The SG-RAR will also highlight those administrative burdens that were not identified as a burden by stakeholders.

Furthermore, the SG-RAR might come across other relevant findings during the consultative process as well as the subsequent analysis phase; the SG-RAR will report these findings and make appropriate recommendations to the Council.

In its final report to the IMO Council, the SG-RAR will report the following:

- an updated inventory of administrative requirements that includes the results of the consultation and analysis of the requirements;
- recommendations on changes to administrative requirements that are perceived as administrative burdens, and, as appropriate, their prioritization; and
- any other relevant findings and recommendations, as appropriate.

The Council will subsequently consider the SG-RAR's report and decide how best to take the recommendations forward. Recommendations regarding reducing or simplifying requirements in mandatory IMO instruments will most likely be forwarded to the relevant Committees (FAL, LEGAL, MEPC, MSC) for consideration and action.

4. DESCRIPTION OF AN EXAMPLE

(...)

5. FAQs

[who am I? how to identify yourself in the consultation]

(...)

6. TEXT FOR "REVIEW" BUTTON

[collection of email addresses to inform stakeholders of updates to the process]

(...)

7. DISCLAIMER

(...)

ANNEX 4

(Note: final version to be found in SG-RAR/23)

DRAFT CONSULTATION DOCUMENT (REVISED)

1. Stakeholder group

Please fill in the following to indicate identify which group of stakeholders you belong to represent. This is to ensure that each group of stakeholders has been sufficiently covered in the consultation process.

Please select from the list:

2. Identification

Filling in this section is mandatory for those responding on behalf of an institution, organization or group of stakeholders. For those responding on a personal title filling in this section is voluntary. In the latter case, the provision of some basic personal information about you may be helpful in case we wish to contact you either with questions about your response or to consult with you about your comments or ideas to ensure that these receive full consideration.

The information provided will not be used for any other purpose than this consultation and will not be published or disclosed to anybody not involved in administering the consultation process. Although general statistics relating to responders will be produced all personal information will be deleted when the consultation is completed.

If you have any questions or concerns please contact AdministrativeBurdens@imo.org.

Drop-down

GOVERNMENT/ADMINISTRATION	ADMINISTRATION COASTAL STATE CONTRACTING GOVERNMENT FLAG STATE INVESTIGATING STATE PARTY PORT STATE PSC OFFICER PUBLIC AUTHORITY REGISTRY
IMO	SECRETARY-GENERAL /SECRETARIAT
SURVEYOR/RO	NOMINATED SURVEYOR RECOGNIZED ORGANISATION
SHIP'S MANAGEMENT	COMPANY OWNER MASTER SHIP'S CREW
OTHER	ARBITRATION COATING INSPECTOR MANUFACTURER SHIPPER SHIPYARD NO SPECIFIC STAKEHOLDER

Name	<input type="text"/>
Surname	<input type="text"/>
Country	<input type="text"/>
E-mail	<input type="text"/>
Organisation	<input type="text"/>

ADMINISTRATIVE REQUIREMENT: XXX

3. Do you experience **consider this administrative requirement as a ~~burden~~ **unnecessary, disproportionate or obsolete?****

- | | | | | | |
|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| very much | much | neutral | hardly | not at all | not relevant |

4. Please elaborate your answer

5. How frequently ~~do you have to fulfill or update~~ **has the requirement to be fulfilled or updated?**

- | | | | | | | |
|------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Select how often | Time-related | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| | | once | annually | monthly | weekly | Daily |
| | Survey-related | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | |
| | | Initial survey | Renewal Survey | Intermediate Survey | Annual survey | |

6. Do you have any suggestions on how to change the present requirement in order to reduce the administrative burden?

7. Do you have any additional comments?



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