SUMMARY OF DECISIONS
10th MEETING OF THE *AD HOC* STEERING GROUP FOR
REDUCING ADMINISTRATIVE REQUIREMENTS

The SG-RAR, which met on 24 and 25 June 2014 at BIMCO House in Copenhagen, Denmark (see annex for participation) agreed to the agenda, as set out in SG-RAR/54, and expressed its sincere appreciation to Mr. Jeppe Juhl and BIMCO for hosting the meeting and the Danish Maritime Authority for facilitating the meeting. Further the SG-RAR:

1)   Approved, on a provisional basis, the draft final report part 1, as set out in SG-RAR/44/Rev.1, as revised, on the understanding that it would have to be revisited once the complete draft report had been produced, see agenda item 8.

2)   Approved the results of the assessment of the first 50 AR's on list 3, as set out in SG-RAR/53, but agreed that ARs number 59, 63 and 64 would have to be revisited due to recent updates in the course of considering agenda item 3.

3)   Decided, - before carrying out the assessment of the remaining 131 AR's on list 3 (document SG-RAR/55), based on the work of the External Project Assistant and the results of the informal pre-assessment meetings on 11 and 15 April 2014, which the SG-RAR were thankful for as they had provided much needed information to base the assessment on - on a number of general principles for the final outcome of the assessment:
   • consistency, conciseness and clarity/transparency of the recommendations would have to be improved throughout, and the SG-RAR agreed that the Chairman and the External Project Assistant should do this following the meeting;
   • the SG-RAR should be careful not to suggest/express opinions on the existence of a burden or not, but rather conclude in terms of (un)necessary, (dis)proportionate, relevant/obsolete; and
   • comments or notes should not be presented in the final templates of the assessment, as it should only reflect the comments and the SG-RAR's recommendation.

4)   Agreed, in line with the work plan, to identify similarities/commonalities/interrelations between lists 1, 2 and 3 in order to highlight relevant issues on some ARs that had – for one reason or other – not been identified as ABs in the course of the consultation, as they might still benefit from being reviewed.

5)   Discussed provisionally the main conclusions/recommendations to the Council and identified a number of general issues that should be presented as part of its findings, where action could be envisaged by the Organization, including:
   i.   electronic reporting and notifications through GISIS;
   ii.   electronic copies of certificates;
   iii.   electronic documents, manuals and publications
   iv.   electronic recording and logbooks
   v.   other electronic/software solutions;
   vi.   harmonization and/or integration of requirements;
   vii.   ISPS matters; and
   viii.   the need to take into account the stakeholders beyond the ship to ensure smooth flow of information.

Also the matter of the general comments in the consultation was discussed, and these still needed to be assessed by the SG-RAR.

6)   Also discussed possible other findings identified in this and the first assessment meeting, including:

i.   Highlighting that facilitating notification through GISIS could have the added benefit of increasing compliance and easing implementation;
ii.   Highlighting that although administrative requirements may not impose a burden individually the accumulation of administrative requirements often results in burdensome situations;
iii. Regulatory requirements to carry codes on board ships – is it necessary for IMO's requirements to mandate this – would this not be done anyway?;
iv.   Some articles by nature expire, but they are kept alive by the instrument. Considering introducing review to "cull" these articles;
v.   Look at possible overlaps within the notifications sent to IMO – where is IMO heading regarding notifications? Overall policy needed;
vi.   Ensure that "old" regulations are not repeated in new instruments without given proper consideration to their purpose;
vii. Possibility for integrating manuals etc. in systems instead of demanding stand-alone documents;
viii. Ensure that IMO regulations do not for example mandate a manual logbook or infer hard copy only by use of terms such as "in writing" or "written", but should at least suggest an acceptance of an electronic format could be used to drive change;
ix.   GISIS: recommendations on a "new vision", not only on the role of IMO, but also on the architecture and use of GISIS, including consequential (additional) costs/resources; and
x.   Circulars and non-mandatory resolutionsand various kinds of additional "guidance" impose other ARs and could need a review.

Regarding SG-RAR/56 (assessment of the checklist used to assess (future) administrative burdens (UO's)) it was agreed to consider this matter through correspondence.

7)   Discussed specific issues regarding the final report and decided that:
•   Regarding consultation response figures (annex 4) the number of forms/questionnaires should be used (approx. 3229) rather than the number of submitted forms (1091);
•   Regarding presentation of (general/specific) statistics on results of the analysis of responses (annex 5), the SG-RAR appreciated the External Project Assistants work, and agreed that graphs etc. were useful, and that some would be of specific interest to the Council and others as feedback to stakeholders;
•   The updated inventory should include unique numbering to better identify the ARs
•   Presentation of AR lists in final report (annexes 6-8) would be in a summary form, whereas the full templates could be made available on the website, to ensure that seafarers would find specific responses to their comments; and
•   It would be beneficial to include some lessons learned both from the perspective of the External Project Assistant and the members. It was agreed that these should be fairly general and simple, bearing in mind that future activities would be forward-looking and not retrospective as the current. Matters raised were the need for provision of a budget and possibly targeted consultations to be carried out.

In this context the matter of how to ensure that action is taken by the Organization was discussed, bearing in mind that no specific planned outputs had been included in the High-level Action Plan for 2014-2015 to carry out specific work on the SG-RAR recommendations. The group would likely be able to suggest some avenues of action, but Member States, Council and the committees would have to take action to ensure that things would progress including through appropriate actions to be included in future Strategic and High-level Action Plans.

8)   Welcomed the offer from the Chairman and the External Project Assistant to carry out the preparation of the draft final report part 2, with the aim of finalizing by mid-August and to be approved finally at the September meeting.

9)   Agreed that the public report would be prepared by the IMO's Technical Writer and the External Project Assistant, and layout would be done professionally.

10)   Agreed to hold its next (and likely final) meeting on Thursday 25 September 2014 (9.30 am – 4 pm) at IMO,

Ms Anne Skov Strüver informed that
   •   a presentation would take place on the first day of FAL regarding a trial for a "paperless ship", and
   •   on 7 October 2014 during Danish Maritime Days in Copenhagen, "Maritime Consensus" would take place with the heading "How would you spend 10 million USD on electronic solutions to reduce administrative burdens for the maritime sector?"

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PARTICIPANTS

Mr John Akhurst
Dr Christos Atalianis
Mr Branko Berlan
Mr Jeppe Juhl
Mr Guangling Li (representing Mr. Wei Zhang)
Mr Jesper Loldrup (accompanied by Ms Patricia Santos)
Mr. Dumisani T. Ntuli
Ms Angela Plott
Mr Kees Polderman
Ms Anne Skov Strüver (accompanied by Mr. Peter Krog-Meyer)
Mr E.J. Terminella
Mr David Tongue

Mr Nik Bizas (SG-RAR assistant)

Regrets:
Captain Ike Enriques
Mr Si-Won Lee
Mr Ali Akbar Marzban
Mr Mohamed Marzagui
Mr Yasufumi Onishi
Cdr Carlos Salgado
Ms Katy Ware

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