





MARITIME SAFETY COMMITTEE 87th session Agenda item 20 MSC 87/20/2 23 February 2010 Original: ENGLISH

#### **GENERAL CARGO SHIP SAFETY**

## Comments on the FSA study – Step 2 (Risk Analysis)

## Submitted by the Islamic Republic of Iran

#### SUMMARY

Executive summary: This document provides comments on IACS FSA Study -

Step 2 (Risk Analysis) regarding General Cargo Ship Safety

Strategic direction: 5 and 12.1

High-level action: 5.2.1 and 12.1.2

Planned output: 12.1.2.2

Action to be taken: Paragraph 6

Related document: MSC 87/20/1

## Introduction

- 1 The Islamic Republic of Iran appreciates the efforts of IACS in providing document MSC 87/20/1 on FSA Study Step 2 (Risk Analysis), and believes that the above-mentioned document contains useful points that can be effective in establishing methods to minimize maritime casualties and improved safety and marine pollution prevention.
- As mentioned in paragraph 6 of the above document (MSC 87/20/1), the FSA Study did not cover non-IACS classed General Cargo Ships and included only IACS classed vessels. In that paragraph, IACS advised the IMO to take a closer look into the issues related to non-IACS classed vessels.

## **Proposal**

- 3 The Islamic Republic of Iran believes that a large number of vessels over 500 GT in the world are classed by non-IACS classification societies and also considering the fact that a large number of seafarers are sailing with above mentioned vessels, which causes more accident and loss of life in various sea areas in the world.
- The vast variety of non-IACS classification societies does not have comprehensive statistical information coverage on the accidents/incidents occurring on these vessels, their causes, and their severity in terms of fatality and injuries, pollution and damage to the environment and properties.

The Islamic Republic of Iran proposes that, in line with the IMO's vision for promotion of safety of navigation and protection of the marine environment, a comprehensive study be conducted on the causes of incidents on non-IACS classed vessels through, for instance, the establishment of an *Ad hoc* Working Group or designation of competent consultants under IMO supervision, so that the findings could be used in preventing and minimizing such occurrences.

# **Action requested of the Committee**

The Committee is invited to consider the proposal and take action as appropriate.