

SUBMISSION 118 TO ICONS

To Peter Morris
ICONS Australia

Dear Peter,

Your 'Ship Safety' Investigations

Further to the meeting in London in November I would like to add a few constructive observations.

1. There is little doubt that "**Flag States**" are at the heart of ensuring compliance with Regulations and Safety Requirements.

I feel that the maritime administrations behind Flag States need strengthening, possibly standardisation and at least a minimum basic structure (eg. EU Flag State Proposals) including exclusive surveyors, statutory surveys carried out by IACS surveyors, full casualty reports etc with full publicity of the respective Flag State facilities.

2. **IACS** – So much has been levelled at Classifications Societies but we should continue to recognise that if class is to be too restricted or controlled and thus reduce the flexibility of those at the "sharp end" the value to shipowners and the industry will be reduced and who else will carry out the work currently their responsibility? It is my view that an **independent** committee with strong endorsing powers should be incorporated within the AIACS structure. This would strengthen IACS decisions and assist in reducing any internal conflict of interest which may exist within IACS' own council and give greater authority to the General Secretariat.

3. Perhaps as an extreme a combined body to "oversee" both Flag States and Classification Societies but will we ever get adequate international agreement to do this? But unless industry do find some way of self-regulation in this direction inevitably some national administrations will tighten their own Maritime Regulations which will give EU an even greater opportunity to take drastic action.

4. These are my views and not necessarily those of IUMI.

Regards

A.S.Nunn

23 December
Dorset, U.K.