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Agenda item 11

C 113/INF.3
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**PERIODIC REVIEW OF ADMINISTRATIVE REQUIREMENTS
IN MANDATORY IMO INSTRUMENTS**

**Lessons learned from the public consultation on the reduction of
administrative requirements**

Note by the Secretariat

SUMMARY

Executive summary: The Ad Hoc Steering Group for Reducing Administrative Requirements reviewed the process of the public consultation on the reduction of administrative requirements. The annex to this document contains the general results of this review

Strategic direction: 8

High-level action: 8.0.4

Planned output: 8.0.4.1

Action to be taken: Paragraph 4

Related document: C 113/11

1 The final report of the Ad Hoc Steering Group for Reducing Administrative Requirements (SG-RAR) (annex to C 113/11) reports on the Group's general findings from an analysis and assessment of the responses received during a public consultation held over the period May to November 2013.

2 With a view to possible future consultations by the Organization, the SG-RAR reviewed the process of the public consultation on the reduction of administrative requirements, thereby taking stock of "lessons learned" and points of special attention for possible future consultations.

3 The annex to this document presents the general results of the review undertaken by the SG-RAR.

Action requested of the Council

4 The Council is invited to note the information contained in the annex to this document.

ANNEX

LESSONS LEARNED FROM THE PUBLIC CONSULTATION ON THE REDUCTION OF ADMINISTRATIVE REQUIREMENTS

Introduction

1 The work of the SG-RAR was an innovative undertaking for the Organization that was designed and carried out with the explicit aim of addressing an especially complex and wide ranging issue, that of the reduction of administrative burdens, i.e. administrative requirements that are, or have become, unnecessary, disproportionate or obsolete. Consequently, (a) the consultation had a considerably expansive remit and focus, (b) presenting, as a result of the former, methodological challenges with regard to both the construction of the data collection instrument and the actual collection of relevant data (c) which the steering group addressed without any relevant prior experience. The consultation was therefore both a significant, innovative undertaking without priors in the history of the Organization and a considerable challenge in terms of design and implementation.

2 Assessment of the data collection process, and analysis of results indicated that the SG-RAR was successful in its undertaking, as it (a) developed an extensive, all-encompassing yet easily navigable consultation matrix that managed to capture the issue to an appropriate degree (given the amount of requirements that had to be covered), (b) captured heated and current debates and issues affecting stakeholders in the maritime industry, and (c) collected data that helped formulate concrete recommendations on reducing administrative burdens.

3 Analysis of consultation results confirmed that steps were taken in the right direction and provided added value in the form of lessons learned from the process, the aim of which is informing any consultations or relevant research taking place in the future and ultimately ensuring that such consultations benefit from the valuable experience gained from this undertaking.

Lessons learned

Accessibility/ease of use of consultation form

4 The design of the consultation matrix proved in practice to be appropriate for capturing essential and relevant data. That said, later reflection indicated that there could be room for improvement with regard to accessibility and ease of use.

5 Those working on future consultations are therefore encouraged to consider alternative designs with a less complex, more easy-to-use layout. Analysis of consultation results revealed discrepancies e.g. between ratings on similar requirements that seem to come up due to factors, such as the positioning of requirements, on the consultation matrix. Simpler designs could include drop-down menus and a step-by-step questionnaire that would guide the respondent through the consultation form without requiring them to scroll through an extensive matrix spanning a number of screens, as was the case in the current consultation.

6 Lastly, a limited number of stakeholders provided feedback on alternative consultation designs. Future consultations could allow for a feedback section in each questionnaire that would provide respondents with the ability to share their feedback on ways to improve accessibility and ease of use, thus tapping on the collective expertise and opinion of the maritime sector and potentially identifying more purpose-appropriate consultation designs.

Coding of questionnaire

7 Although it is important to note that this did not inhibit the analysis of data for the current consultation, future questionnaires/consultation instruments could be coded in a manner that allows for further statistical analysis such as, for example, analysis of interrelationships between stakeholders' perception of a burden, frequency, reporting requirements etc. Such coding could involve the use of Likert-scale type approaches (see example in paragraph 11 – Wording of questionnaire).

8 It is therefore recommended to consider such analysis in advance of designing and coding the questionnaire, with an aim to produce more in-depth and statistically significant findings.

9 It is necessary, however, to note that in order to produce reliable and statistically significant results from statistical checks such as the above, certain factors need to be in place (i.e. statistically significant numbers of unique respondents).

Wording of questionnaire

10 There were instances of respondents who unintentionally provided wrong feedback (i.e. identifying requirements as burdens while not considering them as such). These discrepancies between recorded and actual opinion were spotted following correspondence with stakeholders and reportedly took place because of confusion with the wording used.

11 Whereas the wording used in the consultation can be considered quite clear, it is recommended that future consultations provide more explicit wording with an aim to avoid such occurrences, which can provide distorted data that does not correspond to the reality on the ground. An example of this could include a Likert-scale type approach that would repeat the wording referring the variable in question, i.e. "Very much burdensome – Much Burdensome – Neutral – Little Burden – No Burden at all".

Targeted approach

12 As has already been noted, a consultation of this kind has no priors in the relevant experience of the Organization, and as such lacked a reference point for such a targeted approach. It is in the light of this fact, therefore, that the eventual reach of the consultation needs to be examined and assessed. The number of respondents reached, therefore, can be considered satisfactory, as it covered a wide range of stakeholders in the sector and provided insight into multiple facets of the modern reality of shipping. It must be noted, however, that a more targeted approach would have ensured not only greater numbers of respondents (thus providing more representative information on the sector) but also greater representation of specific sectors that were underrepresented in this survey.

13 It is therefore recommended that future consultations follow a more targeted approach, by setting specific targets with regard to the number and nature of stakeholders that they intend to reach, making more extensive use of available communication channels, and monitoring response rates with a view to attaining the aforementioned targets (i.e. in terms of stakeholder numbers that have replied to the consultation).