

Stakeholder Feedback: MERIT Working Group Process and Risk Methodology

Overview: This document chronicles recent stakeholder feedback regarding the MERIT Working Group's risk assessment approach and provides expert guidance on refining the methodology to align with international best practices. The objective is to ensure that the MERIT process remains credible, objective, and focused on enhancing system resilience.

Stakeholder Perspective: Pacific Merchant Shipping Association (PMSA). In a communication dated June 27, 2026, Mike Jacob (PMSA) raised critical concerns regarding the subjectivity of recent survey instruments. Key observations include:

- **Expertise Alignment:** Risk assessment questions must be directed to domain-specific experts. Navigational, structural, and policy-level risks require distinct expertise and cannot be addressed by a monolithic survey group.
- **Contextual Baseline:** Without clear baseline safety performance and existing mitigation metrics, risk assessment risks becoming a subjective, fear-based exercise that may inaccurately imply systemic instability in a harbor with a proven safety record like ours.
- **Purpose of Inquiry:** Questions such as "what keeps you up at night" should be re-framed to explicitly identify where the committee should prioritize its efforts rather than eliciting subjective concerns that lack measurable context.

Expert Guidance: Methodology and Strategic Framing. In response, HSC Chair sought technical advice from IMIS Global (Ernie Batty) and JCJ Consulting (Jillian Carson-Jackson). Both emphasized the concerns raised are consistent with recognized IALA methodologies (PAWSA, SIRA, IWRAP, IRMAS). The following strategic framework is recommended:

- **Confidence Building:** Risk analysis is a tool to prove system robustness, demonstrate due diligence, and validate existing, highly effective mitigations.
- **Domain Separation:** IALA guidance dictates clear separation between expert judgment (pilots, VTS, engineers), stakeholder perception, and technical traffic modeling.
- **Resource Optimization:** The process must identify where current mitigations are working, where effort is not needed, and where targeted improvements yield the highest impact.

Path Forward: The MERIT Working Group will focus on objective risk mitigation. By factoring in proven benefits of, for example, pilotage, professional training, VTS, and trained improvisation, the working group will seek evidence-based validation of the San Francisco Bay's maritime safety regime and quantifiable solutions when they are needed.