

NEWS BRIEF

III 11

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The IMO Sub-Committee on Implementation of IMO Instruments (III) held its 11th session from July 20 to July 25, 2025. This Brief provides an overview of the more significant issues progressed at this session.

KEY DEVELOPMENTS

- Guidance on remote surveys / ISM Audits / ISPS Verifications
- Revision of the 2023 HSSC Guidelines
- Revision of the 2023 Procedures for Port State Control
- Unified Interpretations of "Completion Date of the Survey"

ABS RESOURCES

- ABS Regulatory News (link)
- ABS Regulatory Lessons (link)
- ABS Safety in Minutes Video Series (link)
- ABS Remote Survey Services (link)
- ABS Port State Control Checklist (link)
- ABS Smart Scheduler™ Survey Booking Tool (link)
- ABS Rules and Guides (link)

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DEVELOPMENT OF SURVEY GUIDANCE

Revision of the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC)

The Survey Guidelines, initially adopted as Assembly Resolution A.746(18), have undergone regular reviews and updates to align with new regulatory requirements. Although these guidelines are not mandatory according to the IMO, they are mandated for all European Union Recognized Organizations under EU Regulation (EC) 391/2009.

The Sub-Committee had previously established a Correspondence Group (CG) to review the text of the *Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2023*, (Resolution A.1186(33)) to identify any gaps between the Survey Guidelines and the mandatory requirements, which includes those amendments to the relevant IMO regulations that have entered into force up since December 31, 2023.

Incorporated into the latest amendments to the Survey Guidelines under HSSC are the survey items related to the Industrial Personnel (IP) Code, as well as survey items related to the examination of certificates and records, including the Anti-Fouling System (AFS) certificate.

Along with the draft amendments to the Survey Guidelines under HSSC, the Sub-Committee considered the following issues:

- Survey items relevant to the calibration check of BWMS and review of all survey items subject to the BWM Convention – since the revision of the BWMS Code is currently under way, the Sub-Committee considered that the review of the survey items relating to the BWM Convention be conducted after the amendments to the BWM Convention are adopted.
- Development of Guidelines for the Hong Kong Convention (HKC) – the Sub-Committee acknowledged the need to incorporate survey guidelines under the HKC into the HSSC Guidelines, but considered that they would require further technical consideration at a future session. Until incorporation into the HSSC Guidelines, the current *2012 Guidelines for the Survey and Certification of Ships under the Hong Kong Convention* (MEPC.222(64) continue to be applicable.

The Sub-Committee finalized the draft amendments to the Survey Guidelines under HSSC 2023. These draft revisions encompass survey requirements for mandatory instruments that will come into effect by December 31, 2025, along with amendments to SOLAS, following its four-year cycle for entry into force.

Next Steps: The revised guidelines will be presented at Assembly 34 (December 2025) for adoption with an entry into effect date from 1 January 2026.

Guidance on remote survey, ISM Audit and ISPS Verification

Based on experience gained from the increased use of remote surveys and audits as a result of the COVID-19 pandemic, Member States have generally recognized the benefits of remote surveys and are seeking to formalize guidelines for such surveys as their use expands.

Following the below roadmap for the development of Guidance for remote surveys, ISM Code audits and ISPS Code verifications, the Sub-Committee had agreed on draft amendments in relation to remote surveys and remote audits in the first phase, which were adopted at Assembly 33 in December 2023.

No.	Sub-output	Target Completion
1	Amendments to the Survey Guidelines under the HSSC (part 1) and amendments to the Revised Guidelines on the implementation of the International Safety Management (ISM) Code (part 2)	(Adopted at A 33)

2	Guidance on assessments and applications of remote surveys, ISM Code audits and ISPS Code verifications (part 3)	(Expected to be adopted at A 34)
3	Further amendments to the Survey Guidelines under the HSSC (part 1) and amendments to the Revised Guidelines on the implementation of the International Safety Management (ISM) Code (part 2)	(Expected to be adopted at A 34)

At this session, the Sub-Committee finalized the draft *Guidance on Assessments and Applications of Remote Surveys, ISM Code audits and ISPS Code Verifications* and the associated draft MSC-MEPC circular.

The Guidance is structured in four parts to provide guidance for conducting remote surveys under HSSC, ISM audits and ISPS verifications:

1. Part A: Common guidance (use of remote technology for surveys related to statutory certification under IMO instruments)
2. Part B-1: Guidance specific to remote surveys of ships under the HSSC Guidelines
3. Part B-II: Guidance specific to remote audits for ships and companies under the ISM Code
4. Part B-III: Guidance specific to remote verifications for ships under the ISPS Code

Guidance for ISPS Remote Verifications

In considering the eligibility for remote verification under the ISPS Code, the Sub-Committee agreed that due to the highly sensitive nature of the information addressed in ISPS verifications, remote verification in lieu of in-person attendance should be limited to extraordinary circumstances, and for interim, intermediate and additional shipboard verifications only.

In-Person and Remote Audits for DoC ISM Audits

The guidance provides that interim, initial, renewal, and additional Document of Compliance (DoC) ISM audits should be conducted in-person, with exceptions for interim DoC audits when adding a new ship type to an existing DoC. The Sub-Committee furthermore agreed that interim audit should not be fully replaced by remote audits.

Guidance for additional remote survey/audit/verification and specific technical requirements

Part A, section 7 of the draft guidance contains *Required Technical Objectives* on the use of Information and Communication Technology (ITC) in order to achieve an equivalent level of assurance to in-person attendance for any survey/audit/verification item conducted remotely

Part A, section 10 on Use of Remote Survey/Audit/Verification for other than Required Periodic Scheduled Surveys/Audits/Verifications limits the use of remote technology for the examination and correction of deficiencies to the correction to items which do not pose an immediate threat to safety, security or the environment. This should be evaluated on a case-by-case basis by the Administration or the RO/RSO, and is subject to approval by the Administration.

Method for developing and assigning a coding system to update the Survey Guidelines under the HSSC

The Sub-Committee considered a sample template to identify whether a survey item is eligible or not for a remote survey, and subsequently agreed to the addition of a new column in the Survey Guidelines under the HSSC as the preferred method, to be further developed and assigned by an intersessional correspondence group.

The Sub-Committee recommended to keep the guidance under review, based on the experience gained in conducting remote surveys, audits and verifications.

Next Steps: The draft *Guidance on Assessments and Applications of Remote Surveys, ISM Code Audits and ISPS Code Verifications* is to be submitted to MEPC 84 (April 2026) and MSC 111 (May 2026) for approval.

HARMONIZATION OF PSC ACTIVITIES WORLDWIDE

Revision of the Guidelines and Procedures for PSC

The Sub-Committee finalized the draft *Guidelines for Port Control Officers on Security Aspects* to be included as a new appendix 20 to the 2023 *Procedures for Port State Control, 2023* (A.1185 (33)) and agreed to the draft amendments to various appendices to the *Procedures for Port State Control, 2023* providing guidance in relation to the detention of ships.

The draft *Guidelines for Port Control Officers on Security Aspects* are aimed at assisting PSCOs in performing their duties. The draft guidelines are based on the relevant sections of the *Interim guidance on control and compliance measures to enhance maritime security* (resolution MSC.159(78)), however, considering that not all Port State Control Officers (PSCOs) are also qualified Duly Authorized Officers (DAOs), only the relevant contents of MSC.159(78) reflecting the role and activities of the PSCO are incorporated as guidance for PSCOs exclusively.

The draft guidelines provide clarity between the functions and the limitation of responsibilities of the roles of both PSCOs and DAOs, and clear guidance to PSCOs on issues that could indicate a potential security concern, and may require escalation to a DAO, while retaining flexibility for Administrations where a PSCO is appointed to perform both roles.
Furthermore, the draft guidelines take account of the non-mandatory nature of Part B of the ISPS Code, pointing out that security measures outlined in the Ship Security Plan are not accessible to all PSCOs without prior consultation with the flag Administration.

Along with the draft *Guidelines for Port Control Officers on Security Aspects*, the Sub-Committee finalized the updated list of instruments related to security matters to be set out in the annex to appendix 20.

> **Next Steps:** The draft amendments to the 2023 *Procedures for Port State Control* (A.1185 (33)), including the draft *Guidelines for Port Control Officers on Security Aspects* are to be submitted for adoption at Assembly 34 (December 2025).

Discussion on Means of Escape from Spaces below the Bulkhead Deck

Differing interpretations between the Flag State and Port State Control have led to detentions of ships related to means of escape from spaces below the bulkhead deck, prompting the proposal to revise the Unified Interpretations (UIs) of SOLAS regulations II-2/9 and 13 (MSC.1/Circ.1511/Rev.1) aiming to clarify the term "lower part" in relation to escape routes from areas below the bulkhead deck, as this term is not defined in SOLAS.

The issue has raised the question of rightful flag States' interpretations of mandatory provisions being potentially challenged by PSC officers, and regarding the need for potential guidance in the context of the harmonization of PSC activities.

MSC 110 approved circular MSC.1/Circ.1689 *on Escape arrangements from the lower part of machinery spaces* (SOLAS regulations II-2/13.4.1 and 13.4.2), inviting PSC Authorities to take a pragmatic approach during inspections until the review and amendment to the SOLAS requirements.

The Sub-Committee agreed that the technical matter concerning the interpretation of escape arrangements from the lower part of machinery spaces (SOLAS regulations II-2/13.4.1 and 13.4.2) had been addressed by MSC 110 and would be further considered by SDC 12.

It was emphasized that the fundamental right of flag States to interpret mandatory provisions of IMO instruments must be respected. However, such interpretations should be based on sound technical justification and established IMO guidance, and should be timely and transparently documented, preferably at the design and construction stage.

The Sub-Committee further reminded the Port States that the principles in paragraphs 1.2.5 and 1.2.6 of the Procedures for PSC should be adhered to when carrying out PSC inspections:

> *1.2.5: "where the provisions of the relevant conventions are not specific, the port State control officer (PSCO) should in principle accept the design arrangement approved by the flag State and when appropriate consult with the flag Administration".*
> *1.2.6: "The PSCO should be aware that the provisions of relevant conventions permit Administrations to grant exemptions, allow equivalents and approve alternative design and arrangements (ADA). When an Exemption Certificate is issued in accordance with the relevant provisions of a convention, provided it includes the correct reference to the exemption provision and the requirement to which it relates, or the ship carries the approved ADA documentation (e.g. SOLAS 1974 regulation II-1/55.4.2), port State authorities should interpret this as meaning that the ship complies with the provisions of the Convention. Port State authorities should check, whenever possible, with the Administration should there be any doubt whether an exemption, equivalence or ADA has been granted".*

Next Steps: The technical matter concerning the interpretation of escape arrangements from the lower part of machinery spaces (SOLAS regulations II-2/13.4.1 and 13.4.2) will be further considered by SDC 12 (January 2026).

ANALYSIS OF MARINE SAFETY INVESTIGATION REPORTS

Analysis of Marine Casualty Reports and Lessons Learned

The Sub-Committee received the report of the intersessional correspondence group in which 36 marine safety investigation reports were collected for analysis of both content and quality of reporting. In analyzing the reports, the major contributing factors of 22 were management related, 19 were related to risk assessment, 20 related to safety culture, and 12 were related to training. Some of the more significant observations identified for follow-up actions are as follows:

Inadequate standards and regulations for cargo handling spaces of specialized self-unloading bulk carriers
Following several fire incidents in the cargo handling area of self-unloading bulk carriers, the Sub-Committee found a critical regulatory gap in the fire safety standards applicable to specialized self-unloading bulk carriers. This safety issue demonstrates the potential for enhancement of the fire detection, suppression and fixed fire-extinguishing systems for these type of vessels.

Risks involved with wearing inflatable lifejackets
The Sub-Committee noted a submittal on raising awareness concerning the risks involved with wearing inflatable lifejackets and the importance for people to understand how to safely deflate and remove an inflatable lifejacket while in the water should they need to do so in an emergency.

> **Next Steps:** The Sub-Committee agreed to re-establish the Correspondence Group on Lessons Learned and Safety Issues identified to continue the analysis of marine safety investigation reports and its work on identified safety issues. Additionally, the IMO Secretariat will publish a summary of 36 Lessons Learned from the analysis of reported marine casualties at this session in form of an MSC circular.

OTHER DEVELOPMENTS

Unified Interpretation of “completion date of the survey”

The Sub-Committee considered a proposal for the revision of MSC-MEPC.5/Circ.3 on the *Unified Interpretation of the Date of Completion of the Survey and Verification on which the Certificates are based*.

Ambiguity in the application of the existing interpretation has led to inconsistent understandings with respect to whether the provision applies solely to initial and renewal surveys, or also to intermediate, annual, or periodical surveys, resulting in varied practices in the completion of certificates. The proposed revision aims to clarify that this date should refer specifically to the date of the last initial or renewal survey, which is consistent with current practice.

Sub-Committee agreed to the draft revised UI with the amended text:

> *"Where the completion date is indicated on the certificate, the date is based on the date of the last initial/renewal survey and verification visit, as relevant, on which all items required to be surveyed or verified have been surveyed or verified regardless if the items were found satisfactory or with minor deficiencies or non-conformities".*

Next Steps: The draft revised UI of “completion date of the survey” is to be submitted to MEPC 84 (April 2026) and MSC 111 (May 2026) for approval.

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