

IMO'S SUB COMMITTEE ON IMPLEMENTATION OF IMO INSTRUMENTS (III)

11th Session, 21 July – 25 July 2025

Session Outcome



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Indian Register of Shipping

The 11th session of the Sub-Committee on Implementation of IMO Instruments (III 11) was held at IMO Headquarters from the 21st to the 25th of July 2025. A summary of important outcomes of III 11 is given in the following.

Concise Summary of Important Decisions made

III 11 finalised the following with a view to be approved by Assembly 34 or to be adopted by MSC and MEPC as appropriately indicated below:

- ✓ Draft amendments to Procedures for Port State Control (PSC), 2023, with a new appendix on security aspects and updated list of relevant instruments for PSC for submission to Assembly 34 for adoption; with an anticipated entry into force of 1 January 2026.
- ✓ Draft amendments to the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2023 for submission to Assembly 34 for adoption (incorporation of IP Code, examination of certificates and records from other Conventions); with an anticipated entry into force of 1 January 2026.
- ✓ Draft amendments to the 2023 Non-exhaustive list of obligations under instruments relevant to the IMO Instruments Implementation Code, for submission to Assembly 34; with an anticipated entry into force of 1 July 2026.
- ✓ Guidance on assessments and applications of remote surveys, ISM Code audits and ISPS Code verifications and the associated MSC-MEPC circular, for submission to the Committees for approval at MEPC 84 and MSC 111.

III 11 finalised the following:

- ✓ The revised Model Course 3.09 on PSC
- ✓ Amendment to Unified Interpretation (MSC-MEPC.5/Circ.3) on completion date of survey.

III 11 noted the report on Port Reception Facilities (PRF).

A brief of relevant topics which were discussed at III 11

1. Measures to harmonize port State control (PSC) activities and procedures worldwide:

- The Sub-Committee finalized the 2025 Procedures of the Port State Control adding a new appendix (Appendix 20 - Guidelines for Port State Control Officers (PSCO) on security aspects) with the view of their adoption in a consolidated form by Assembly 34.
- Finalized the revised "List of instruments relevant to port State control procedures" and agreed to append it to the draft amendments to the Procedures for PSC, 2023 as **Appendix 21**. The relevant requirements arising from the outcomes of the previous MEPC 80, MSC 107, MEPC 81, MSC 108, MEPC 82 and MSC 109 were incorporated.
- Considered the issue concerning the interpretation of escape arrangements from the lower part of machinery spaces (SOLAS regulations II-2/13.4.1 and 13.4.2). While MSC.1/Circ. 1511/Rev.1 clarified this, yet discrepancies remain between Flag State approval of the arrangement and PSC interpretations of the regulations.

Noting the issue, III 11:

- reminded flag States and recognized organizations that the issuance of certificates, including those of equivalence, should comply with relevant provisions of a convention, to be interpreted as indicated in paragraph 1.2.6 of the Procedures for PSC, 2023 (resolution A.1185(33)); and
- 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.
- The III 11 also considered two cases related to STCW:
 - The case of improper endorsements of the Certificate of Competency (CoC). The Sub-Committee invited the Member States to ensure the endorsements in accordance with regulation I/10 of the STCW Convention and MSC.1/Circ.1450 and promote inspection of endorsements.
 - The challenges related to the implementation and enforcement of seafarers' work and rest hours regulations as several PSC inspections delivered reports diverging from seafarers' feedback. The Sub-Committee referred to HTW 12 which is competent to consider regulatory solutions overcoming the limits inherent in PSC.
- The Sub-Committee agreed on the need for the proposed evolution of the PSC module in GISIS into a more robust, responsive, and user-centric **overarching database with web service**, in recognition of the strategic goals and benefits for all the stakeholders and the maritime sector at large.
- Reviewed and finalized the text of the draft revised **Model Course 3.09 on Port State Control** taking in to account the guidance provided in MSC-MEPC.2/Circ.15/Rev.2 - *Guidelines for the development, review and validation of model courses*. The course aims to standardize and strengthen the competence of PSCOs worldwide.

2. Updated Survey Guidelines under the Harmonized System of Survey and Certification (HSSC)

- III-11 agreed to the draft amendments to the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2023 (resolution A.1186(33)) finalized by the Working Group, together with the draft Assembly resolution, for submission to A. 34 for adoption. The draft amendments to HSSC includes relevant survey requirements for mandatory instruments that will enter into force up to and including **31 December 2025**.
 - III 11 agreed on the proposed changes to the survey items pertaining to the examination of certificates and records from other Conventions. In this regard, noting that the AFS Convention 2001 did not provide for a harmonized system of survey and certification for

the Anti-fouling System Certificate, III 11 confirmed the deletion of the provisions related to AFS Convention 2001 in the Survey Guidelines under the HSSC.

➤ Survey items pertaining to Industrial Personnel Code incorporated into the revised HSSC.

- III 11 considered the development of survey guidelines for the Hong Kong Convention to be incorporated into the HSSC guidelines noting the entry into force of the Convention wef 26 June 2025. However, due to time constraints, inclusion in the 2025 edition of the HSSC was not possible.
- The revised guidelines are expected to be adopted at Assembly 34 (December 2025) and are expected to enter into force on 01 January 2026.

3. Guidance on assessments and applications of remote surveys, ISM Code audits and ISPC Code verifications:

- Finalized the draft text of the guidance on assessments and applications of remote surveys, ISM Code audits and ISPS Code verifications and the associated MSC-MEPC circular.
- III 11 agreed on the draft guidance related to ISPS remote verifications. Given the highly sensitive nature of the information involved in ISPS verifications, III 11 concurred that remote verifications in lieu of in-person attendance should be limited to extraordinary circumstances, and only for interim, intermediate, and additional shipboard verifications.
- III 11 considered the scope of audits carried out to issue interim Safety Management Certificates (SMCs) and Documents of Compliance (DOCs) under the ISM Code with a view to assess their eligibility for remote audit and agreed that interim audit should not be fully replaced by remote audits, as endorsed by III 10.
- III 11 agreed for addition of a new column in the Survey Guidelines under the HSSC as the preferred method, to identify whether a survey item is eligible or not for a remote survey and recommended that the addition of a new column in the Survey Guidelines under the HSSC should be further developed and assigned by an intersessional correspondence group for consideration by the next session of the Sub-Committee.
- The draft Guidance and the associated draft MSC-MEPC circular is expected to be submitted to MEPC 84 in April 2026 and MSC 111 in May 2026 for approval.

4. Non-exhaustive list of obligations under instruments relevant to the IMO Instruments Implementation Code (III Code):

- III 11 finalized draft amendments to the **2023 Non-exhaustive List of Obligations** under resolution A.1187(33), based on updates to mandatory instruments entering into force up to 1 July 2026. The draft, along with a consolidated draft Assembly resolution, will be submitted to A. 34 for adoption.

5. Marine Casualty Investigation:

- Approved the draft III circular with 36 case studies and lessons learned from marine casualties.
- Considered the safety issues related to the inadequate fire safety standards and regulations for the cargo handling spaces of specialized self-unloading bulk carriers and tasked the working group for detailed consideration and to develop a proposal for a new output on addressing this safety issue.
- Considered information on the risk involved with wearing inflatable lifejackets and the importance for people to understand how to safely deflate and remove an inflated lifejacket while in the water should they need to do so in an emergency.

- Concerns were raised on the continuous fatalities associated with enclosed space entry, and further exploration of the human behavioural response in emergency to incorporate into future guidance and training programmes was supported.
- Considered the lessons learned on improving the assessment and mitigation of risk associated with parametric rolling of ships, in particular the information provided on the improvement of MSC.1/Circ.1228, & implementation of second-generation stability criteria (MSC.1/Circ.1627). It was noted that parametric rolling could occur in significant wave heights as low as 2.6 m, whereas parametric rolling is generally viewed as a heavy weather phenomenon.

6. Unified interpretation of provisions of IMO safety, security, environment, facilitation, liability and compensation-related conventions:

- III 11 considered the 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.
- III 11 agreed to revise the interpretation to clarify that where the completion date is indicated on the certificate, the date should be 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 of whether the items were found satisfactory or with minor deficiencies or non-conformities.

7. Analysis of reports on alleged inadequacy of Port Reception Facilities (PRF):

III 11 considered 29 cases of alleged PRF inadequacies reported in GISIS for the year 2024 (compared to 68 cases in 2023). Most reports cited unavailability or inadequate facilities and unreasonable charges. In this context the Sub-Committee:

- Urged Parties to MARPOL to ensure that their respective reports had been submitted within the PRF module to ensure a complete and accurate set of data; and
- Requested the Secretariat to continue providing an annual enforcement report on PRFs to the next session.

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