

IMO SUB COMMITTEE ON IMPLEMENTATION OF IMO INSTRUMENTS (III)

12th Session, 20th – 24th July 2026

Session Outcome



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Indian Register of Shipping

IMO Sub-Committee on Implementation of IMO Instruments (III) - 12th Session

The 12th session of the Sub-Committee on Implementation of IMO Instruments (III 12) was held at IMO Headquarters from the 20th to 24th of July 2026.

Concise Summary of Important Decisions made

III 12 agreed on the following:

- ✓ Proposed amendments to FAL.2/Circ.133- MEPC.1/Circ.902-MSA.1/Circ.1646-LEG.2/Circ.4 on List of certificates and documents required to be carried on board Ships, 2022, with the associated draft circular cover, with a view to concurrent approval by MEPC 85, MSA 112, LEG 114 and FAL 51.
- ✓ Updated list of relevant instruments for 2025 Procedures for Port State Control.
- ✓ Coding System for determining remote survey eligibility for survey items in Survey Guidelines under the Harmonized System of Survey and Certification (HSSC) (Resolution A.1207(34)).
- ✓ Draft amendments to the 2025 Survey Guidelines under the Harmonized System of Survey and Certification (HSSC) for submission to Assembly 35th Session, including those for pilot ladders.
- ✓ Draft amendments to the 2025 non-exhaustive list of obligations under instruments relevant to the IMO Instruments Implementation Code, for submission to Assembly 35th Session.
- ✓ Tasking HSSC Correspondence Group with developing amendments to the Guidelines on implementation of the ISM Code by Administrations and Companies.

III 12 also:

- ✓ Approved reports regarding Port Reception Facilities, Analysis of consolidated audits summary reports, and lessons learned from casualties.
- ✓ Initiated a comprehensive review of the Casualties Investigation Code and associated guidelines.
- ✓ Agreed on draft revised guidelines for the seaworthiness and safety inspection of small fishing vessels and safety inspection checklists for small fishing vessels, with a view to approval by MSA 112 and for a subsequent joint publication by FAO and IMO.

Summary of relevant topics which were discussed at III 12

1. Consideration and analysis of reports on alleged inadequacy of port reception facilities – Agenda Item 3

The Sub-Committee urged States to strengthen mandatory reporting via the PRF module in GISIS system and recommended to improve data management for better identification of PRF implementation issues.

2. Lessons learned and safety issues identified from the analysis of marine safety investigation reports – Agenda Item 4

The Sub-Committee:

- Approved the draft III circular with 63 lessons learned from 70 marine casualty case studies.
- Approved the III circular on analysis of incidents of ruptured high-pressure cylinders.
- Discussed the safety issues regarding the accident of MV Dali, Bridge Navigational Watch & Alert Systems while also acknowledging the need for further discussion.
- Correspondence Group on Lessons Learned and Safety Issues identified from the analysis of Marine Accident Investigation Reports and Review of the Casualty Investigation Code & associated implementation guidelines (A.1075(28)) was re-established with a targeted completion year of 2028 focusing mainly on addressing the quality and timeliness of investigations and reports
- Agreed to the draft new output proposal amending the LSA Code for addressing risks involved with wearing inflatable lifejackets, with a view to consideration by MSC 112.

Proposed amendments include:

- ✓ mandatory deflation and removal instructions on lifejackets
- ✓ warnings regarding inflation in confined spaces
- ✓ inclusion of deflation procedures during passenger safety briefings.
- Agreed to submit a new output proposal to MSC 112 to address fire standards for cargo handling spaces of specialized self-unloading bulk carriers.

The proposal includes:

- ✓ mandatory fire detection systems
- ✓ fixed fire-extinguishing systems
- ✓ flammability standards for conveyor belts
- ✓ amendments to SOLAS Chapter II-2.

3. Measures to harmonize port State control (PSC) activities and procedures worldwide – Agenda Item 6

- III 12 established a correspondence group to conduct further discussion on:
 - ✓ qualifications of Port State Control Officers (PSCO)
 - ✓ development of guidelines for PSCOs on enhanced machinery and maintenance inspections
- III 12 agreed with the revisions to the appendix 21 of the 2025 Procedures for Port State Control (A.1206(34)).
- III 12 agreed to the framework for the entrant training manual for PSCO, with a view to being used as a basis for the development of the actual manual
- III 12 initiated development of the 2027 edition of the Procedures for Port State Control, expected to enter into force on 1 January 2028.

4. Analysis of nine consolidated audit summary reports (CASRs) under the IMO Member State Audit Scheme (IMSAS) – Agenda Item 9

- III 12 agreed with the need to further refine and enhance the current methodology for the analysis of CASRs for audits conducted during the second cycle.
- III 12 agreed to establish a correspondence group (CG) on the development of a comprehensive list of provisions left "to the satisfaction of the Administration" or equivalent, and corresponding guidance, with a view to submitting its report to III 13.
- III 12 agreed that no amendment to the IMSAS framework, audit standard or audit-related documentation and guidance pertaining to the Port State control officer qualification and oversight should be pursued at this stage.
- III 12 recognized the need to strengthen technical cooperation and capacity-development activities regarding PSCO qualification, training and the effective administration and oversight of national PSC programmes.

5. Updated survey guidelines under the harmonized system of survey and certification (HSSC) – Agenda Item 10

- III 12 agreed to the text of the proposed amendments to FAL.2/Circ.133-MEPC.1/Circ.902-MSC.1/Circ.1646-LEG.2/Circ.4 on List of certificates and documents required to be carried on board ships, 2022, with the associated draft circular cover, with a view to concurrent approval by MEPC 85, MSC 112, LEG 114 and FAL 51.
- III 12 agreed to the draft amendments to the 2025 Survey Guidelines under the Harmonized System of Survey and Certification (HSSC) (resolution A.1207(34)). The draft amendments to HSSC includes relevant survey requirements for mandatory instruments that will enter into force up to and including **31 December 2027**. The draft amendments address survey items pertaining to the following:
 - Fire Safety of Ro-Ro Passenger Ships (SOLAS)
 - Lifting Appliances and Anchor Handling Winches (SOLAS)
 - Extinguishing media containing perfluoro octane sulfonic acid (SOLAS)
 - Installation of electronic inclinometers on applicable ships (SOLAS)
 - Rational emission control strategy for applicable marine diesel engines (NOx Technical Code)
 - Use of Gas cargo as Fuel (IGC Code)
- III 12 agreed to detailed provisions of survey items for pilot ladders covering strongpoints, manropes, type-approval certification, maintenance records, crew familiarization, and means of communication. These survey requirements would be mandatory from 1 January 2028.
- III 12 agreed to the coding system for determining eligibility of remote surveys for the 2025 Survey Guidelines under the HSSC.
- III 12 agreed to the draft amendments to MSC/Circ.1140-MEPC/Circ.424 (Transfer of Flag between States) together with an associated draft MSC-MEPC.2 circular, with a view to concurrent approval by MEPC 85 and MSC 112. A proposed requirement for Flag States to also notify IMO when not registering a ship due to its failure to meet international rules was discussed in detail. However, the provision was removed from the draft text as consensus could not be reached on the intent and practicality of implementation.
- III 12 re-established the Correspondence Group (with India as coordinator) to work on the following terms of reference:

- ✓ continue to develop, draft amendments to the Survey Guidelines under the HSSC, 2025 (resolution A.1207(34)), deriving from the amendments to the relevant mandatory instruments due to enter into force up to and including 31 December 2027, taking into account outcomes of MSC 111, MEPC 84 and future sessions of MSC and MEPC.
- ✓ agree on the clarification text for the use of the coding descriptors 'Y', 'N', 'C' in the eligibility for remote survey column.
- ✓ develop amendments to Survey Guidelines regarding the survey items relevant to the Hong Kong Convention taking into account resolution MEPC.222(64).
- ✓ consider the need to amend the Survey Guidelines under the HSSC, in the context of the revised Explanatory Notes (MSC.1/Circ.1369/Rev.1) to ensure harmonized and uniform implementation of the SOLAS regulations for safe return to port.

6. Non-exhaustive list of obligations under instruments relevant to the IMO Instruments Implementation Code (III Code) – Agenda Item 11

- III 12 agreed to the draft amendments to the 2025 Non-exhaustive list of obligations under instruments relevant to the III Code (A.1208(34)).
- III 12 established another Correspondence Group (with China as coordinator) to work on the following terms of reference:
 - ✓ continue to develop draft amendments to the 2025 Non-exhaustive list of obligations under instruments relevant to the IMO Instrument Implementation Code (III Code) (A.1208(34)), deriving from those amendments to the relevant IMO instruments which will enter into force up to and including 1 July 2028.
 - ✓ continue with the comprehensive review of the NEL taking into the work which had been performed up to and at III 12.
 - ✓ Undertake a comprehensive review of the NEL with regard to their fundamental structure and underlying philosophy and report to III 13.

7. Comprehensive revision of the Guidelines on the implementation of the ISM Code by Administrations and companies – Agenda Item 12

- III 12 established a Correspondence Group (with India as coordinator) to:
 - ✓ Undertake a comprehensive review of the documents submitted to recent committee and sub-committee sessions pertaining to the ISM Code
 - ✓ develop draft amendments as appropriate to resolution A.1188(33) and MSC-MEPC.7/Circ.8 relating to the guidelines on the implementation of the ISM Code by Administrations and companies respectively.

The amendments aim to:

- Modernize ISM implementation
- Accommodate digital safety management systems
- Improve oversight
- Facilitate remote audits
- Eliminate duplication with the III Code and RO Code.

8. Unified interpretation of provisions of IMO safety, security, environment, facilitation, liability and compensation-related conventions – Agenda Item 13

- III 12 considered the need of a unified interpretation on MSC.581(110) pertaining to the carbon dioxide monitoring of enclosed spaces.
- III 12 agreed that a unified interpretation should not be developed as MSC.581(110) is not a mandatory instrument

- III 12 invited Member States and Organizations to submit proposals for new output to the Maritime Safety Committee in this regard.

9. Cooperate with the United Nations on matters of mutual interest, as well as provide relevant input/guidance - Review the draft guidelines for the seaworthiness and safety inspection of small fishing vessels and associated inspection checklist – Agenda Item 14

III 12 agreed to the revised guidelines for the seaworthiness and safety inspection of small fishing vessels and safety inspection checklists for small fishing vessels, with a view to approval by MSC 112, and subsequent dissemination as a joint publication by FAO and IMO.

For any queries, you can reach out to:

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