



Türk Loydu Summary Report – III 10

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TLR /III 10

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summary report

The 10th session of the Sub-Committee on Implementation of IMO Instruments (III 11) was held from July 22 to 26, 2024. Main decisions and discussions have been summarized hereunder.

LESSONS LEARNED AND SAFETY ISSUES IDENTIFIED FROM THE ANALYSIS OF MARINE SAFETY INVESTIGATION REPORTS

The Sub-Committee approved the draft text of 34 lessons learned from marine casualties (covering areas like asphyxiation in enclosed spaces, fall hazards, fumigation risk, and rescue/survival crafts) for compilation and release on the IMO website.

Analysis of over 300 collisions between fishing vessels and commercial ships reported by more than 50 Member States indicated that less than 20% of the fishing vessels involved carried working AIS or VHF at the time of the collision. Consequently, III 10 drafted an MSC.1 circular on *Recommendations to national Administrations to expand the requirements for carriage and use of AIS and VHF for the domestic fishing fleet*. This draft circular is expected to be submitted to MSC 109 for consideration and approval.

MEASURES TO HARMONIZE PORT STATE CONTROL (PSC) ACTIVITIES AND PROCEDURES WORLDWIDE

III 10 further developed draft PSC Guidelines on control and compliance measures to enhance maritime security (based on resolution MSC.159(78)) for eventual inclusion as a new appendix to the Procedures for Port State Control. The aim is to finalize this at III 11 for adoption by Assembly 34. It was noted that sections of MSC.159(78) unrelated to PSCO responsibilities should be revised, moved, or deleted.

To ensure consistency and avoid duplication, III 10 agreed to adopt Appendix 2 (Guidelines for the detention of ships) of the Procedures for PSC, 2023, as the single, authoritative source for detainable deficiencies, with amendments to Appendices 8, 9, 11, and 18 reflecting this change. These amendments were approved for submission to Assembly 34 in 2025.

The issue of applying "clear grounds and detainable deficiencies" when "records of daily hours of rest are not on board" was discussed, but due to complexity and varying legal interpretations among regional PSC regimes, III 10 deferred further action at this stage. The HTW Sub-Committee was invited to consider this matter for further clarification of the application of relevant STCW provisions

UPDATED SURVEY GUIDELINES UNDER THE HARMONIZED SYSTEM OF SURVEY AND CERTIFICATION (HSSC)

III 10 reviewed and continued development of draft amendments to the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2023 (Resolution A.1186(33)). These revisions incorporate requirements from mandatory instruments entering into force up to December 31, 2025.

The session confirmed the outcome of analysis leading to the removal of unnecessary footnotes and agreed on proposed consequential amendments following a gap analysis between HSSC guidelines and mandatory requirements.

Instructions were given to identify and propose necessary changes to delete survey items that pertain to the examination of certificates and records from other conventions not relevant to the current survey being conducted

DEVELOPMENT OF GUIDANCE ON ASSESSMENTS AND APPLICATIONS OF REMOTE SURVEYS, ISM CODE AUDITS AND ISPS CODE VERIFICATIONS

III 10 made progress on developing comprehensive guidance for the assessment and application of remote methods for surveys (HSSC), ISM Code audits, and ISPS Code verifications.

Due to the highly sensitive nature of the information involved, III 10 maintained the view that the use of remote verification in lieu of in-person attendance should be limited to extraordinary circumstances for ISPS Verifications.

The Sub-Committee agreed to use the term "ISM Code audits" in the guidance. Interim, initial, renewal, and additional Document of Compliance (DOC) ISM audits should generally be in-person, though remote methods may be considered for interim DoC audits when a new ship type is being added. Remote audits should not fully replace in-person activities.

DEVELOPMENT OF GUIDANCE TO ASSIST COMPETENT AUTHORITIES IN THE IMPLEMENTATION OF THE CAPE TOWN AGREEMENT OF 2012

III 10 finalized the Interim Guidance to assist competent authorities (Administrations) in implementing the Cape Town Agreement of 2012, along with an associated draft MSC resolution.

The draft MSC resolution invites Parties and Member States to consider establishing measures to ensure that compliance of existing fishing vessels with CTA requirements is documented, as appropriate.

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