



Türk Loydu Summary Report – III 12

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TLR /III 11

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summary report

The 12th session of the Sub-Committee on Implementation of IMO Instruments (III 12) was held from 20 to 24 July 2026. The main decisions and discussions are summarized below.

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

The Sub-Committee continued the analysis of marine safety investigation reports and casualty data, including passenger ships, container ships, bulk carriers, enclosed-space accidents and falls on board ships. It approved work leading to two III.3 circulars covering Lessons Learned from marine casualties and the analysis of incidents involving ruptured high-pressure cylinders.

- New output proposals on fire standards for cargo-handling spaces of specialized self-unloading bulk carriers and risks associated with wearing inflatable lifejackets were agreed for consideration by MSC 112.
- The review of the Casualty Investigation Code and its implementation guidelines was initiated, with priority given to improving the quality and timeliness of investigations and reports while preserving their independent, objective and safety-focused purpose.

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

III 12 reviewed the activities and statistics of regional PSC regimes and progressed amendments to the 2025 Procedures for Port State Control (resolution A.1206(34)).

- Guidance for PSC officers on enhanced machinery and maintenance inspections will be developed further, while clearly distinguishing mandatory IMO requirements from class rules and non-mandatory guidance.
- The qualifications and competencies of PSC officers will be reviewed with a view to achieving a balanced, competency-based framework that supports harmonized minimum standards.
- The overarching PSC database project and the entrant training manual for PSC personnel were progressed. The draft framework in document III 8/6 was accepted as the basis for developing the manual.

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

Work continued on amendments to the Survey Guidelines under the HSSC, 2025 (resolution A.1207(34)), reflecting amendments to mandatory IMO instruments entering into force up to and including 31 December 2027. The consolidated amendments are intended for finalization at III 13 and subsequent submission to A 35.

The Sub-Committee established the Working Group on Survey Guidelines under the HSSC. The Working Group agreed that a significant portion of the technical work associated with the revision of the Survey Guidelines under the HSSC, 2025 and related implementation matters would require further development between sessions. Consequently, the establishment of a Correspondence Group was endorsed in order to continue the work intersessionally and prepare consolidated proposals for consideration at III 13.

The Correspondence Group was tasked with advancing the draft amendments to the Survey Guidelines under the HSSC, taking into account recently adopted and forthcoming amendments to mandatory IMO instruments. Particular attention will be given to the integration of future SOLAS and related convention amendments within the four-year HSSC update cycle, ensuring that the Guidelines remain aligned with the latest regulatory developments.

A further key responsibility concerns the development of guidance for remote surveys. The Group will continue refining the proposed coding system and explanatory text associated with remote-survey applicability, including the clarification of the Y/N/C eligibility indicators and the appropriate incorporation of these provisions within the HSSC framework. Members emphasized that remote surveys should provide an equivalent level of assurance to traditional surveys and must remain subject to clearly defined eligibility criteria.

The Group was also instructed to continue the development of survey guidance under the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, with the aim of producing mature draft provisions for incorporation into future editions of the HSSC Survey Guidelines. In addition, where necessary, the Group may consider consequential amendments related to "safe return to port" provisions and other associated survey requirements.

The Working Group agreed that the Correspondence Group should submit a comprehensive report to III 13, including proposed amendments, outstanding issues and recommendations for future action. Coordination of the intersessional work will be undertaken by the appointed coordinator, with the objective of ensuring the timely completion of all technical drafting activities before the next session.

Transfer of ships between states

The Sub-Committee progressed amendments to MSC/Circ.1140-MEPC/Circ.424 on the transfer of ships between States, together with an associated MSC-MEPC circular. The work focuses on communication and transparency between flag States when ships are transferred or de-registered.

Broader legal issues concerning stateless or abandoned ships, including the role of former flag States and port State jurisdiction, are to be referred to the Legal Committee for further consideration.

COMPREHENSIVE REVISION OF THE GUIDELINES ON THE IMPLEMENTATION OF THE ISM CODE BY ADMINISTRATIONS AND COMPANIES

III 12 initiated a comprehensive revision of the guidelines for implementation of the ISM Code by Administrations (resolution A.1188(33)) and companies (MSC-MEPC.7/Circ.8). The objective is to improve usability and effectiveness while retaining the goal-based and flexible nature of the ISM Code.

Digital Safety Management Systems should be addressed through a flexible, principle-based and technology-neutral approach, as tools supporting the safety management system rather than as separate management systems.

Potential revisions will consider remote auditing, internal audit schedules, corrective-action time frames, the role of the Designated Person and Management of Change, while avoiding duplication and disproportionate administrative burdens.

SMALL FISHING VESSEL SAFETY

The draft guidelines for seaworthiness and safety inspection of small fishing vessels and the associated inspection checklist were reviewed and finalized by an Experts Group. The voluntary guidelines aim to improve safety at sea and facilitate access to insurance services, particularly for small fishing vessels in developing countries, and are intended for approval by MSC 112 and publication as a joint FAO/IMO instrument.

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