



# Türk Loydu Summary Report – III 11

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TLR /III 11

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summary report

The 11<sup>th</sup> session of the Sub-Committee on Implementation of IMO Instruments (III 11) was held from July 21 to 25, 2025. 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 considered the report of the Correspondence Group on Analysis of Marine Safety Investigation Reports and other documents regarding lessons learned and safety issues raised from marine casualties. Main issues are considered as follows:

- Inadequate standards and regulations for cargo handling spaces of specialized self-unloading bulk carriers
- Risks involved with wearing inflatable lifejackets (entrapment)

The Sub-Committee established the Working Group on Analysis of Marine Safety Investigation Reports and approved a draft III circular incorporating 36 Lessons Learned, aimed at informing the maritime industry, including seafarers, ship managers, and training institutions.

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

III 11 finalized draft amendments to the Procedures for Port State Control (PSC), 2023 (resolution A.1185(33)), which are expected to be adopted at Assembly 34 in December 2025 and enter into force on January 1, 2026.

- Security Aspects: A new appendix was finalized: Guidelines for Port State Control Officers (PSCO) on Security Aspects. These guidelines enhance maritime security by detailing the articulation between PSCOs and Duly Authorized Officers (DAOs) regarding security aspects, especially where deficiencies might trigger escalation to a DAO.
- Relevant Instruments: The list of relevant instruments for PSC procedures was updated and renumbered as Appendix 21, incorporating requirements arising from MEPC 80-82 and MSC 107-109.

Discussions regarding differing interpretations between Flag States and Port States, specifically concerning means of escape from spaces below the bulkhead deck, emphasized the fundamental right of Flag States to interpret mandatory IMO provisions, provided these interpretations are based on sound technical justification and established IMO guidance. Port States were reminded to adhere to PSC Procedures paragraphs 1.2.5 and 1.2.6, which require PSCOs to generally accept Flag State approvals or alternative design arrangements.

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

Draft amendments to the Survey Guidelines under the HSSC, 2023 (resolution A.1186(33)) were finalized for submission to A 34, expected to be adopted in December 2025 and enter into force on January 1, 2026. Following main items were amended in new Survey Guidelines:

- IP Code Integration: Survey items pertaining to the International Code of Safety for Ships Carrying Industrial Personnel (IP Code) were confirmed for incorporation into the Survey Guidelines.
- Certificate Review: Amendments included changes to survey items related to the examination of certificates and records from other Conventions. Notably, provisions related to the Anti-fouling System Certificate were deleted, as the AFS Convention 2001 lacks a harmonized system for survey and certification.

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

*Guidance on assessments and applications of remote surveys, ISM Code audits and ISPS Code verifications*

III 11 finalized the draft Guidance on assessments and applications of remote surveys, ISM Code audits and ISPS Code verifications, along with the associated MSC-MEPC circular. This guidance aims to ensure that the level of compliance verification achieved remotely is equivalent to that of in-person attendance.

The guidance is structured in four parts:

1. Part A: Common guidance on the general use of remote technology for statutory certification activities under relevant IMO mandatory instruments.
2. Part B-I: Guidance specific to remote surveys of ships under the Harmonized System of Survey and Certification (HSSC) Guidelines.
3. Part B-II: Guidance specific to remote audits/verifications for ships and companies under the International Safety Management (ISM) Code.
4. Part B-III: Guidance specific to remote verifications for ships under the International Ship and Port Facility Security (ISPS) Code.

The finalized guidance is expected to be submitted to MEPC 84 in April 2026 and MSC 111 in May 2026 for approval. The Sub-Committee also agreed to keep the guidance under continuous review based on the experience gained from conducting remote activities.

Summary of important items from guidance can be outlined as below (please refer to guidance for use of remote survey/audit/verification, e.g. consecutive surveys, high risks ships, etc.):

- The guidance confirms that, under normal circumstances, initial and renewal surveys (except for documentary checks), including Passenger Ship Safety Renewal Surveys, should not be carried out remotely.
- Initial, intermediate, renewal, and additional shipboard ISM audits should not be fully replaced by remote audits
- Due to the highly sensitive nature of security information, remote verifications for the ISPS Code are generally limited to extraordinary circumstances (See A 1188(33), 4.8.2) and only for interim, intermediate, and additional shipboard

verifications, subject to specific assessment and authorization by the flag Administration.

### *Eligibility Criteria and Coding System in HSSC*

Remote activities generally fall into two categories:

- Eligible Items: Those concerning the review of records and documents, performance of tests of safety sensors and alarms, and verification of the provision of equipment without involving any substantial verification of its condition.
- Non-Eligible Items: Items requiring a substantial verification of the condition of the equipment (e.g., examining a fire pump). However, non-eligible items might become eligible if the equipment has been physically examined/serviced by an approved service supplier within the relevant survey time window.

The Sub-Committee agreed that the preferred method for designating remote survey eligibility for each item in the HSSC Guidelines is the addition of a new column. An intersessional correspondence group was tasked with developing and assigning this coding system for consideration at III 12.

### **UNIFIED INTERPRETATION OF PROVISIONS OF IMO SAFETY, SECURITY, ENVIRONMENT, FACILITATION, LIABILITY AND COMPENSATION-RELATED CONVENTIONS**

A revised unified interpretation (MSC-MEPC.5/Circ.3) was agreed upon to clarify the "completion date of the survey". This date is clarified as being 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. The revised circular will be submitted to MSC 111 and MEPC 84 for approval.

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