



IMO Implementation of IMO Instruments Tenth session (III 10)

Summary Report

Summary of significant outcomes

Below is a brief overview of some of the significant outcomes from III 10:

- III 10 made progress on Phase 2 of developing the [draft *Guidance on assessments and applications of remote surveys, ISM Code audits and ISPS Code verifications*](#), and the associated draft MSC-MEPC circular. III agreed that interim, initial, renewal and additional DOC (Document of Compliance) ISM audits should be in person, except for interim DoC audits adding a new ship type, where remote methods may be considered, and remote ISPS verifications should be limited to extraordinary circumstances due to the sensitive nature of the information. An intersessional correspondence group has been tasked to finalise the draft guidance by next III session, for expected adoption at Assembly 34 (December 2025).
- III 10 continued working on the [draft amendments to the *Survey Guidelines under the Harmonized System of Survey and Certification \(HSSC\) 2023, Resolution A.1186\(33\)*](#). The draft revision will incorporate relevant survey requirements for mandatory instruments that will enter into force up to and including 31 December 2025, as well as amendments to SOLAS with the four-year cycle of entry into force. The revised guidelines are expected to be finalised at III 11 for adoption at Assembly 34 (December 2025), with an anticipated entry into force on 1 January 2026.
- III 10 continued discussions on proposed [draft amendments to the “*Procedures for Port State Control 2023*” \(*Resolution A.1185\(33\)*\)](#). The agreed draft amendments include developing PSC Guidelines on control and compliance measures to enhance maritime security, with the aim of including it as a new appendix to the Procedures of PSC, 2023. Additionally, draft amendments to appendix 2, 8, 9, 11, 18 of the Procedures of PSC, 2023 were agreed, to have a single source for detainable deficiencies to ensure consistent guidance on ship detentions.

Introduction

III 10 took place 22 – 26 July 2024 at the IMO in London. This report provides a summary of the outcomes from the meeting which are significant to Lloyd's Register's work with our customers.

Additional Information

Lloyd's Register's [Summary Report for III 9](#) and [Summary Report for MSC 108](#)

Port Reception Facilities

A ship's operational compliance with the discharge requirements of MARPOL depends largely on the availability of adequate port reception facilities (PRF), especially within MARPOL Special Areas. Administrations are obliged to notify the IMO of all cases where the facilities are alleged to be inadequate.

The revisions to MARPOL Annex V that came into force 1 January 2013 decreased the types of garbage which could be discharged into the sea. This revision also made more explicit the solid cargo residues and/or wash water that is hazardous to the marine environment.

III 10 noted the annual enforcement reports on alleged inadequacy in port reception facilities for 2023. The majority of reports for 2023 (51 out of 68 reports) related to MARPOL Annex V waste, with plastics, food waste (especially organic food waste), domestic waste, cooking oil, incinerator ashes and operational waste the most reported categories. Reports related to MARPOL Annex I (12 out of 68 reports) referred to sludge and oily tank washings.

In noting the information, the sub-committee urged member States to strengthen the mandatory reporting through effective provision (or update) of data under the PRF module in GISIS and take further action. It also requested the Secretariat to identify ways of more prominently displaying non-responding port States in GISIS, and to take further action.

Casualty Investigation

III 10 considered documents submitted under this agenda item, including the report of the intersessional Correspondence Group on the Analysis of Marine Safety Investigation Reports, and took the following notable actions:

- Approved the draft text of 34 lessons learned from marine casualties and their release on the IMO website, which shall be published [here](#).
- Agreed to draft MSC.1 circular on Recommendations to national Administrations to expand the requirements for carriage of AIS and VHF for domestic fishing fleet to prevent collisions with fishing vessels. The decision was made following data analysis of more than 300 collisions between fishing vessels and commercial ships reported by more than 50 member States. The finalised draft circular is expected to be submitted to MSC 109 for approval.

Additionally, III 10 considered the Bulk Carrier Casualty Report for 2014-2023, noting that cargo shift and/or liquefaction remains the greatest contributor to loss of life while grounding remains the greatest cause of ship losses. The full Bulk Carrier Casualty Report can be downloaded from [here](#).

Safety issues identified from five recent accidents related to fumigation on board

III 10 considered safety issues identified from five recent accidents related to fumigation on board and recommended that three MSC.1 circulars related to fumigation (i.e. MSC.1/Circ.1264, MSC. 1/Circ.1358 and MSC. 1/Circ.1361/Rev.1) be consolidated and combined into a new MSC.1 circular to facilitate effective implementation of the recommendations on use of pesticides and for the benefit of the end user; and to update the references in the footnote to regulation VI/4 of SOLAS 1974. The matter was referred to CCC for appropriate action.

Harmonization of Port State Control (PSC) activities

III 10 further developed the draft amendments to the “Procedures for Port State Control, 2023” (Resolution A.1185(33)). In particular, III 10:

- Agreed to the draft amendments to appendix 2, 8, 9, 11, 18 of the Procedures of PSC, 2023. The purpose of the draft amendments is to have a single source for detainable deficiencies to ensure consistent guidance on ship detention in relation to the detention of ships, which was agreed to be Appendix 2 of the PSC procedures. The agreed draft amendments are expected to be submitted to Assembly 34 (December 2025) for adoption.
- Agreed to continue developing draft PSC Guidelines on control and compliance measures to enhance maritime security with a view to inclusion as a new appendix to the Procedures for PSC, 2023 in the next version. An intersessional correspondence group has been established to carry out further work, aiming to finalise at III 11. The draft guidelines are being developed based on Resolution MSC.159(78), however this resolution includes sections not relevant for port state control officers (PSCOs) and the PSC Guidelines, and therefore shall be reworded, moved, or deleted, as part of this work.

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

HSSC Survey Guidelines

The *Survey Guidelines under the Harmonized System of Survey and Certification (HSSC)* were originally adopted as Assembly Resolution A.746(18). Since then, the guidelines have been constantly reviewed and updated to accommodate new regulatory requirements. While these guidelines are not made mandatory by the IMO, the guidelines are made mandatory for all European Union Recognised Organisations under EU Regulation 391/2009.

The current guidelines Resolution A.1186(33) include requirements that entered into force up to and including 31 December 2023.

III 10 continued working on the draft amendments to the *Survey Guidelines under the HSSC 2023*. The draft revisions include relevant survey requirements for mandatory instruments that will enter into force up to and including 31 December 2025, as well as amendments to SOLAS with the four-year cycle of entry into force.

Application: The revised guidelines are expected to be adopted at Assembly 34 (December 2025) and are expected to enter into force 1 January 2026. The new resolution will revoke A.1186(33).

III 10 also considered the following items with a view to include them in the next revision of the HSSC Survey Guidelines:

- **A proposal to improve the method of inserting footnotes:** III 10 reviewed the analysis of footnotes contained in the text of the *Survey Guidelines under the HSSC 2023* and agreed to the proposed amendments, in line with the principle, if the instrument referred to in the footnote has been quoted in the text of the corresponding requirement of the mandatory instruments, it is unnecessary to add the footnote in the HSSC Survey Guidelines.
- **Gap Analysis Report with respect to HSSC Survey Guidelines:** III 10 carried out gap analysis to identify any gap between the HSSC Survey Guidelines and the IMO mandatory requirements with a view to removing those items not directly linked to requirements in mandatory instruments. One gap was found with respect to the 1966 Load Line Convention, as modified by the 1988 Protocol, and the MARPOL Convention. Further, III 10 agreed to the proposed consequential draft amendments to the HSSC Survey Guidelines.

Additionally, III 10 referred circular MEPC.1/Circ.876 *Sample Format of Confirmation of Compliance, Early Submission of the SEEMP part II on the ship fuel oil consumption data collection plan and its timely verification pursuant to regulation 5.4.5 of MARPOL Annex VI*, to MEPC 82 to amend outdated referencing of an MEPC resolution and the regulation of MARPOL Annex VI.

Development of Guidance on Assessments and Applications of Remote Surveys, ISM code Audits and ISPS Code Verifications

Government-imposed restrictions during the COVID-19 pandemic highlighted the advantages of remote surveys for maintaining ship certification validity. Recognising this, many flag administrations acknowledged the expanding use and scope of remote surveys. In response, III has been developing guidance on the assessment and applicability of remote surveys, ISM Code audits, and ISPS Code verifications, with this timeline:

No.	Sub-output	Target completion year	Current Status
1	Amendments to the Survey Guidelines under the HSSC (part 1) and amendments to the Revised guidelines on the implementation of the International Safety Management (ISM) Code (part 2)	2023	III 9 agreed on draft amendments in relation to remote surveys and remote audits, which were adopted at Assembly 33 in December 2023.
2	Guidance on assessments and applications of remote surveys, ISM Code audits and ISPS Code verifications (part 3)	2024	Expected to be finalised at III 11 for subsequent adoption at Assembly 34 (December 2025). III 10 requested MSC 109 and MEPC 83 to extend target completion year to 2025.

3	Further amendments to the Survey Guidelines under the HSSC (part 1) and amendments to the Revised guidelines on the implementation of the International Safety Management (ISM) Code (part 2)	2025	Expected to be adopted at Assembly 34 (December 2025), however it may be delayed.
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The adopted amendments in part 1 above focused on when remote technology can be used for various surveys (e.g., annual, renewal, intermediate) or audits. They also identified situations requiring in-person surveys or audits, either to supplement remote methods or as the only appropriate approach.

III 10 made progress on phase 2 of developing the draft text of the *Guidance on assessments and applications of remote surveys, ISM Code audits, and ISPS Code verifications* and the associated draft MSC-MEPC circular. The Guidance addresses the need for harmonisation of requirements for the use of remote methods for surveys, audits, and verifications falling within the scope of HSSC, ISM, and ISPS. The Guidance is arranged in four parts as follows

Part A:	Common guidance (guidance of a general nature that overarches the use of remote technology for activities related to statutory certifications under the relevant IMO mandatory instruments)
Part B-I:	Guidance specific to remote surveys of ships under the HSSC Guidelines
Part B-II	Guidance specific to remote verifications for ships and companies under the International Safety Management Code (ISM Code)
Part B-III	Guidance specific to remote verifications for ships under the International Ship and Port Facility Security Code (ISPS Code)

In particular, III 10:

- Agreed that interim, initial, renewal and additional DoC (Document of Compliance) ISM audits should be conducted in person, except for interim DoC audits when new ship type is to be added to an existing DoC and annual audits between five-year issuance/renewals audits, and consideration may be given to the use of remote auditing methods.
- Agreed that the draft Guidance related to ISPS remote verifications should limit the use of remote verifications in place of in-person attendance to extraordinary circumstances, given the highly sensitive nature of the information involved in ISPS verifications.
- Tasked the correspondence group to review the relevant section on technical requirements in the draft guidance and develop the necessary specific technical requirements for remote methods to achieve a level equivalent to in-person attendance.
- Tasked the correspondence group to review the elements to be examined during an ISPS verification and its eligibility for remote verification, and further develop part B-III of the draft guidance.
- Tasked the correspondence group to develop and update the coding of the HSSC Guidelines for eligible, not eligible, or eligible for remote survey only under extraordinary circumstances, with a footnote that remote surveys may be authorised by the flag administration due to extraordinary circumstances.
- Reviewed the acceptance process for eligible items for remote surveys, audits, and verifications related to rectifying deficiencies following PSC inspections/detentions. III 10 noted that the scope of ISM remote verifications after PSC detentions should be determined by the Administration and may vary. It also noted that additional HSSC surveys could be general or partial, depending on the circumstances. The correspondence group was tasked with further developing the text on this matter.

Due to time constraints, III 10 was unable to finalise the draft guidance. A correspondence group will work intersessionally to finalise it by the next III session, for subsequent adoption at Assembly 34 (December 2025).

Development of Interim guidance to assist Administration in the implementation of the 2012 Cape Town Agreement

The 2012 Cape Town Agreement is an internationally binding instrument that sets minimum requirements on the design, construction, equipment, and inspection of fishing vessels of 24 m in length and over or equivalent in gross tonnes. The Agreement includes mandatory international requirements for stability and associated seaworthiness, machinery and electrical installations, life-saving appliances, communications equipment and fire protection, as well as fishing vessel construction. The agreement will enter into force 12 months after at least 22 States, with a total of at least 3,600 fishing vessels of 24 m in length and over, operating on the high seas have ratified it. Currently, 22 States have ratified with an aggregate number of 2,636 fishing vessels, which is below the 3,600 vessel threshold. To support implementation of the Cape Town Agreement, III was tasked to develop *Interim Guidance to assist Administration in the implementation of the Cape Town Agreement of 2012*.

III 10 finalised the draft MSC resolution on *Interim Guidance to assist Administration in the implementation of the Cape Town Agreement of 2012*, intending to submit it to MSC 109 for adoption. The draft interim guidance explains how to comply with the requirements set forth in the Agreement for a harmonised implementation. It was noted that draft interim guidance should be considered as interim until such time as the Agreement has entered into force and is implemented. Specifically, it was agreed that if a flag State has a pre-existing safety standard higher than the Agreement, those higher national standards should be retained for that State.

Regarding the scope of application of Chapter I of the Agreement to existing vessels, III 10 referred the matter to MSC 109 for their consideration and advice.

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This report has been produced and disseminated immediately after the closure of the meeting in order to provide timely advice to the reader. Consequently we apologise if it has not been fully proof read to remove grammatical errors. New circular and resolution numbers given here may be subject to change when IMO publish the final versions.

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