



IMO Ship Design and Construction (SDC 11)

Summary Report

Summary of significant outcomes

Below is a brief overview of some of the significant outcomes from SDC 11.

- **2011 ESP Code amendments relating to Remote Inspection Techniques (RIT):**
[Draft amendments have now been finalised](#) to permit the use of RIT in support to surveyors undertaking a close-up survey of vessels to which the code applies. They are expected to be applicable from 1 January 2028. A set of guidelines is being developed which could also be applied to ship types other than tankers and bulk carriers once finalised.
- **Safe Return to Port:**
[Draft amendments to MSC.1/Circ.1369](#) - *Interim explanatory notes for the assessment of passenger ship systems' capabilities after a fire or flooding casualty* have been further developed but not finalised. Intersessional work will continue and SDC 12 (January 2026) is expected to complete it. A number of related instruments have also been identified which potentially need amendments in line with the revision to MSC.1/Circ.1369, once finalised.
- **SOLAS amendments relating to traditional and non-traditional steering system and propulsion requirements:**
The work on [amendments to SOLAS chapters II-1](#) (part C – *Machinery Installations*) and V – *Safety of Navigation* and related instruments has been further progressed. It is expected to be finalised by 2028 and enter into force in January 2032. A high-level road map for the development of the requirements has been created which includes the collection and study of results from, for example, ship manoeuvrability tests in order to better develop mandatory provisions.
- **Updates to the Code on Alerts and Indicators, 2009:**
A thorough [review of the Code](#) has been completed to harmonise it with some other IMO Codes and guidelines. MSC 110 will review the draft amendments and is expected to approve them.
- **Underwater Radiated Noise (URN) - Experience Building Phase (EBP):**
As the [EBP](#) is currently underway, there is an urgent need to start collecting experience and results from the implementation of the MEPC.1/Circ.906/Rev.1 - *Revised guidelines for the reduction of underwater radiated noise from shipping to address adverse impacts on marine life*. The results from the EBP will form the basis for discussion and future developments expected to take place at SDC 12 in January 2026
- **Draft guidelines for use of fibre-reinforced plastics (FRP) within ship structures:**
This work was initially expected to be finalised at this session, however, the complexity and range of discussions was noted and given that significant topics still require careful consideration, a correspondence group, was established and will report to SDC 12 (January 2026) Its main focus will be on the development of updates on fire safety and recycling related matters.
- **Draft Interim Guidelines for emergency towing arrangements (ETA) for ships other than tankers:**
SDC 11 completed the [draft amendments](#) which are expected to be submitted to MSC 110 for approval. As it was noted that it will be necessary to gather industry's experience on the application of these new requirements, the draft guidelines will be considered as "Interim" and, as such, are expected to be reviewed after a few years.

Introduction

SDC 11 took place 13 - 17 January 2025 at the IMO in London. This report provides a summary of the outcomes from the meeting which are significant to Lloyd's Register's (LR) work with our customers.

Development of Interim Guidelines for emergency towing arrangements (ETA) for ships other than tankers

The IMO has been developing a new set of guidelines for ETAs applicable to new ships other than tankers of 20,000GT and above. The arrangements should, at all times, be capable of rapid and easy connection to the towing vessel. They are expected to apply from 1 January 2028 supporting SOLAS amendments to regulation II-1/3-4 (MSC.549(108)) which enter into force on the same day.

Designs of ETAs should also be prototype tested to the satisfaction of the Administration, should be clearly marked and are to be designed at least with a means of securing a towline to the strong point.

All ETAs should be inspected by ship personnel at regular intervals and maintained in good working order.

SDC 11 was able to complete the draft amendments which are expected to be submitted to MSC 110 for approval.

Strength requirements

Strength requirements are required for the following major towing components:

- Towing pennants
- Chafing gear
- Closed fairleads such as "Chocks"
- Strongpoints such as "Bollards" or "Bits"

The required towing load of the towing components were discussed and developed at this session. The consensus is that the Equipment Number (EN) should be used as the starting parameter to calculate the required strength. The table below shows the required towing load (kN) in relation to the EN.

Equipment Number (EN)*	Required towing load (kN)
EN<3000	1000
3000≤EN<7200	2000
EN≥10000	0.2 × EN or greater as determined by the Administration

*Equipment Number (EN) should be calculated taking into account *expected* MSC.1/Circ.1175/Rev.2 (see below as the amendments to the circular are still underway)

Note 1: The required towing load may be achieved by summing the design towing loads of multiple arrangements and their deployment should be able to be completed, in harbour conditions, in not more than one hour.

Note 2: The strength should be sufficient for all relevant angles of towline.

Draft amendments to MSC.1/Circ.1175/Rev.1 - Guidance on Shipboard Towing and Mooring Equipment

In addition, consequential amendments to MSC.1/Circ.1175/Rev.1 - *Guidance on Shipboard Towing and Mooring Equipment* are being considered as it currently includes requirements for ships other than tankers (under “other towing”) which will be superfluous once the separate *Interim Guidelines for emergency towing arrangements (ETA) for ships other than tankers* are finalised.

Further amendments have also been agreed to align MSC.1/Circ.1175/Rev.1 with IACS URs A1 - *Anchoring Equipment* and A2 - *Shipboard fittings and supporting hull structures associated with towing and mooring on conventional ships*, and IACS Recommendation No.10 - *Chain Anchoring, Mooring and Towing Equipment*.

These changes will introduce:

- Clarification on how to determine deck cargoes' side-projected area
- Definition and calculation of minimum breaking load of mooring lines
- Clarification on the definition of mooring loads for ships with EN > 2,000
- Guidance on direct mooring analysis which can be used to design more effective mooring systems than the prescriptive formulations, particularly on larger container ships and cruise ships
- Other minor editorial corrections

It is expected that MSC 110 will approve the amendments as MSC.1/Circ.1175/Rev.2 - *Guidance on Shipboard Towing and Mooring Equipment*. The circular will be applicable to ships constructed on or after 1 January 2028 and will be applicable to both "tankers of less than 20,000 tonnes deadweight" and "ships other than tankers of less than 20,000 gross tonnage".

Draft amendments to MSC.1/Circ.1255 - Guidelines for owners/operators on preparing emergency towing procedures

Necessary consequential amendments to MSC.1/Circ.1255 were agreed. The Equipment Number will be added to the list of “Ship-specific data” that should be recorded in the Emergency Towing Booklet (required by SOLAS regulation II-1/3-4.2.2). The aim is to ensure that the EN value is recorded for traceability and records.

The draft amendments are expected to be submitted to MSC 110 for approval.

Further development of the International Code of Safety for Ships Carrying Industrial Personnel (IP Code) and associated guidance

Following the adoption of the new SOLAS chapter XV (Safety measures for ships carrying industrial personnel) and the related new International Code of Safety for Ships Carrying Industrial Personnel (IP Code), the IMO agreed to continue the work to further develop the IP Code.

New draft amendments to Part IV/2 - *Subdivision and stability* have been finalised. They modify the mass for each industrial person to be used in stability calculations for cargo ships that carry more than 12 industrial

personnel which has been increased from 75kg to 90kg to provide a more realistic figure for those onboard and to align with the similar provision in the IP Code regulation V/2.2.

These changes will be expected to be approved at MSC 110 and be applicable to new IP code ships (cargo ships and high-speed cargo craft, of 500GT and upwards, operating on international voyages):

- for which the building contract is placed on or after 1 January 2028; or
- in the absence of a building contract, the keel of which is laid or which is at a similar stage of construction on or after 1 July 2028; or
- the delivery of which is on or after 1 January 2032.

It was agreed that the work on the IP Code revision is, for the time being, finalised. However, delegations have also agreed that once the industry has gained further experience in using SOLAS Ch.XV and the IP Code, further revisions to them, and development of associated guidelines, may be considered.

Revision of MSC.1/Circ.1369 Interim explanatory notes for the assessment of passenger ship systems' capabilities after a fire or flooding casualty and related circulars

Since the approval of *Interim explanatory notes for the assessment of passenger ship systems' capabilities after a fire or flooding casualty (MSC.1/Circ.1369)*, which provides additional guidance to SOLAS regulations II-1/8-1, II-2/21 and II-2/22, technology, processes, fuels and industry experience have changed. Differing interpretations on the implementation of the Safe Return to Port (SRtP) regulations have been observed, especially around single voyages exceeding SRtP range, crew operation and use of gas as fuel or other low-flash point fuels on passenger ships.

Following 15 years of gained experience, MSC.1/Circ.1369 is being fully revised. It was not finalised at this session, however, the currently agreed draft amendments include:

- Broader Scope:
 - The revised MSC.1/Circ.1369 expands the scope to address the entire lifecycle of a ship, from initial design to verification and ship operation (training, maintenance, life-cycle compliance).
- Definitions:
 - New and detailed definitions, such as SRtP design range, casualty thresholds, and operational conditions, provide a clearer framework for compliance and assessment.
- Comprehensive Ship Design Guidance:
 - The revision introduces design parameters that should be known and used at early ship design stage, emphasising redundancy, system segregation, and categorised SRtP and Orderly Evacuation and Abandonment (OEA) systems.
- Verification of Conformity:
 - All SRtP and OEA systems should be assessed against the following casualty scenarios:
 - For each SRtP system:
 - Fire in any casualty threshold
 - Flooding in any watertight compartment
 - For each OEA system:
 - Fire and loss of any main vertical fire zone

- Operational:
 - The new guidance includes the need for high level operational procedures which should consider all aspects of incident response, crew training and drills as well as processes and requirements for audits. It is expected that the IMO HTW sub-committee will further develop operational details in appropriate IMO Instruments.
- Remain Operational – (Appendix 1)
Inclusion of several interpretations for each SRtP system to "remain operational".
- Recommendations of life cycle compliance – (Appendix 2)
Example diagram of the cycle of documentation and submission to be submitted to the Administration for approval.

SDC 12 (January 2026) is expected to conclude the work.

The SRtP and OEA regulations apply to passenger ships constructed on or after 1 July 2010 having a length of 120m or more or having three or more main vertical zones (MVZ). A MVZ may be up to 48m in length, hence a ship with length above 96m will have three or more MVZs and the SRtP regulations apply.

SDC 10 (See LR's [Summary Report for SDC 10](#)) identified the following Instruments as potentially requiring related consequential amendments and harmonisation, however, as the revision to MSC.1/Circ.1369 is still underway, no progress has been made:

- MSC.1/Circ.1400 - Guidelines on operational information for masters of passenger ships for Safe Return to Port by own power or under tow
- MSC.1/Circ.1437 - Unified Interpretations of SOLAS Regulation II-2/21.4 - Fire and flooding casualty, pipes and vent ducts
- MSC.1/Circ.1532/Rev.1 - Revised Guidelines on operational information for masters of passenger ships for Safe Return to Port
- MSC.1/Circ.1539/Rev.1 - Unified Interpretations of SOLAS Chapter II-1 and Safe Return to Port Requirements for Flooding Detection Systems
- MSC.1/Circ.1422 - Unified Interpretations of the Code of Safety for Special Purpose Ships, 2008 (2008 SPS Code)
- MSC.1/Circ.1589) - Guidelines on operational information for Masters in case of flooding for passenger ships constructed before 1 January 2014

To effectively continue the work, a correspondence group was established with the main aim to:

- Finalise appendix 1 and appendix 2.
- Begin the work to amend the related Instruments.
- Report progress to SDC 12 (January 2026).

Draft amendments to the 2011 Enhanced Survey Programme (ESP) Code

Remote Inspection Techniques (RIT)

Proposals to include remote inspection techniques (RIT) as an alternative means for close-up survey of the structure of ships and mobile offshore units were discussed and finalised.

RIT is defined as: “a means of survey of any parts of the structure without the need for direct physical access of the surveyor.”

A number of **guiding principles** have been agreed:

- RIT should not be used as a total replacement for in-person close-up surveys, but rather as a supplemental tool;
- RIT systems should provide the same level of assurance as the close-up visual inspection;

SDC 11 has finalised the draft amendments to the ESP Code. The main changes introduce (but are not limited to):

- How RIT surveys are to be carried out;
- For periodic surveys after the third special survey, the use of RIT is subject to the agreement of the Administration;
- A traditional survey will need to take place if the RIT reveals damage or deterioration that the surveyor judges will require attention or further investigation;
- Actions to be taken by the crew in preparation for the survey (cleanliness of spaces etc.);
- In preparation for the survey programme, details of the RIT equipment and its use is to be included;
- Inclusion of the RIT firm in the survey planning meeting (prior to commencing the survey);
- Principles and procedures for Administrations to certify RIT firms.

Pending approval at MSC 110, entry into force is expected to be on 1 January 2028 and will be applicable to new and existing bulk carriers and oil tankers.

Draft Guidelines for the use of RIT for surveys

Guidelines that further expand on RIT as alternative means of access for close-up survey and thickness measurement, in accordance with the ESP Code requirements, are being developed. It is anticipated that the Guidelines will be completed by 2026 (SDC 12).

To further progress the work, a correspondence group was established with the aims to:

- include guidance for RIT thickness measurements capabilities
- include guidance on the use of RIT for surveyors, ships' personnel, firms using RIT and for manufacturers of RIT
- include guidance for validation and verification of RIT equipment capability (ashore and onboard ship)
- include guidance for certification of RIT equipment
- include guidance for training of personnel of firms and surveyors engaged in the use of RIT
- consider developments within the RIT manufacturing industry and firms using RIT;

The Guidelines are expected to become available no later than when the above ESP Code amendments enter into force (1 January 2028).

Administrations will be able to use the guidelines when considering RIT for ships other than bulk carriers and tankers (ESP Code ships).

Draft amendments to MSC.1/Circ.1502 - Guidance on pressure testing of boundaries of cargo oil tanks under direction of the master

Draft amendments to MSC.1/Circ.1502 have been agreed to align and update the circular with the 2011 ESP Code. This will introduce two conditions that need to be met for the surveyor to accept testing of the boundaries of cargo oil tanks. These are:

- The tank testing is carried out prior to the overall survey or close-up survey; and
- The tank testing has been satisfactorily carried out and there is no record of leakage, distortion or substantial corrosion that would affect the structural integrity of the tank.

Draft amendments to the Guidelines for construction, installation, maintenance and inspection/survey of means of embarkation and disembarkation (MSC.1/Circ.1331)

This circular provides guidelines for the inspection and maintenance of the means of embarkation and disembarkation under SOLAS II-1/3-9. Amendments have been agreed which will mainly impact manufacturers who will need to review the design of accommodation ladders as they will need to comply with updated recognised standards, depending upon on the installation date of the accommodation ladder or gangway, or on the ship's construction date.

The finalised draft amendments include the following changes:

- Crew engaged in rigging the accommodation ladder, gangways or the safety net should have sufficient personal safety protection such as lifejackets and safety harnesses.
- The safety net will not be required if adequate mitigation measures are in place:
 - if the top railing is of rigid construction and a side net (as per ISO 9554:2019) has been rigged between this railing and the base of the accommodation ladder, including its upper and lower platforms; or
 - if the railing is installed in accordance with relevant international standards, at a height of not less than 1,000 mm.
- The safety net and/or side net should be properly stored in ventilated places avoiding sunlight and chemical contamination. It should be checked and maintained regularly and replaced as necessary.
- Safety pins, side nets and their securing points for accommodation ladders and for gangways are added to the list of items that should be thoroughly examined during annual surveys required by SOLAS regulations I/7 - *Surveys of Passenger Ships* and I/8 - *Surveys of Life-Saving Appliances and other Equipment of Cargo Ships*.
- Accommodation ladders and gangways, at every five-yearly survey, should be statically tested with the specified maximum working load of the ladder.

- Winches, at every five-yearly survey, should be operationally tested by raising and lowering the unloaded accommodation ladder.

In addition, the following international standards were included in the guidelines dependent upon the installation date and the ship construction date. Manufacturers should take them into account when designing accommodation ladders, their winches and gangways alongside any national standards and/or other requirements recognised by the Administration:

Ship constructed	Accommodation ladders and gangways for means of embarkation and disembarkation	
	Installed before 1 July 2026	Installed on or after 1 July 2026*
on or after 1 January 2010	Applicable standards: <ul style="list-style-type: none"> ISO 5488:1979 ISO 7061:1993 	Applicable standards: <ul style="list-style-type: none"> ISO 5488:2015 ISO 7061:2015 ISO 7061:2024
before 1 January 2010		Applicable standards, as reasonably as practicable: <ul style="list-style-type: none"> ISO 5488:1979 ISO 7061:1993 ISO 5488:2015 ISO 7061:2015 ISO 7061:2024

"installed on or after 1 July 2026" means:
 (a) for ships for which the building contract is placed on or after 1 July 2026, or in the absence of the contract, the keels of which are laid or which are at a similar stage of construction on or after 1 July 2026, any installation date on the ship; or
 (b) for ships other than those ships prescribed in (a) above, a contractual delivery date for the equipment or, in the absence of a contractual delivery date, the actual delivery date of the equipment to the ship on or after 1 July 2026.

Ship constructed	The construction and test of accommodation ladder winches	
	Installed before 1 July 2026	Installed on or after 1 July 2026*
on or after 1 January 2010	Applicable standards: <ul style="list-style-type: none"> ISO 7364:1983 	Applicable standards: <ul style="list-style-type: none"> ISO 7364:2016
before 1 January 2010		Applicable standards, as reasonably as practicable: <ul style="list-style-type: none"> ISO 7364:1983 ISO 7364:2016

"installed on or after 1 July 2026" means:
 (a) for ships for which the building contract is placed on or after 1 July 2026, or in the absence of the contract, the keels of which are laid or which are at a similar stage of construction on or after 1 July 2026, any installation date on the ship; or
 (b) for ships other than those ships prescribed in (a) above, a contractual delivery date for the equipment or, in the absence of a contractual delivery date, the actual delivery date of the equipment to the ship on or after 1 July 2026.

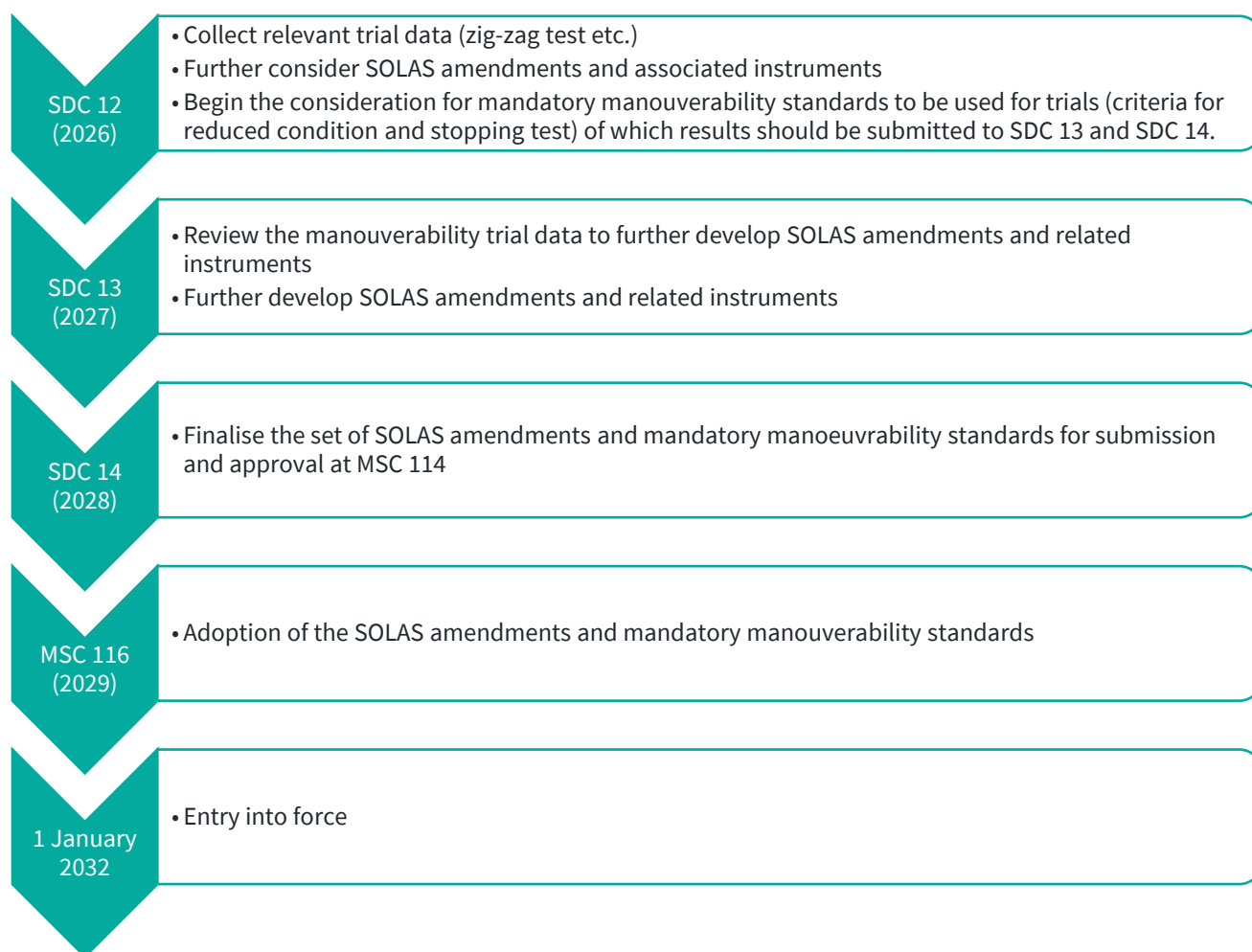
MSC 110 is expected to approve the revised circular as MSC.1/Circ.1331/Rev.1 - *Revised guidelines for construction, installation, maintenance and inspection/survey of means of embarkation and disembarkation*. This revision supersedes MSC.1/Circ.1331.

Draft revision of SOLAS chapters II-1 (part C) and V and related instruments on steering system and propulsion requirements

Steering systems have evolved radically since current SOLAS regulations were adopted - many modern systems are a combination of propulsion and steering. Current SOLAS requirements do not adequately consider non-traditional propulsion/steering systems.

Until now, this issue has been addressed by means of unified interpretations (MSC.1/Circ.1416/Rev.1), however a holistic review is considered necessary to reflect modern propulsion/steering systems in the IMO's regulatory framework.

This work has been further developed and it is expected to be finalised by 2028 taking into account the following high-level roadmap.



Progress was made on the following draft amendments:

- A new SOLAS regulation II-1/28-1 – *Means of going astern and stopping*.
- With a goal to prevent casualties arising from malfunctions or insufficient performance, the proposed amendments address the ship's astern propulsion and stopping ability. Future developments, if agreed, could introduce mandatory performance criteria for providing adequate propulsion performance and adequate ability to stop.
- A new SOLAS regulation II-1/29-1 – *Steering*.
 - With the goal to prevent casualties arising from malfunction, insufficient performance or incorrect use of steering system(s), the current draft provides requirements from expected ship steering performance, which additional information the officer in charge of navigational watch should have access to, the design principles designers should be applying (steering gear performance, failure tolerance of steering system, steering control systems, power supply etc.).
- SOLAS regulation II-1/3- Definitions Relating to Parts C, D and E
 - Updates to definitions such as *Steering system* and *Steering gear* are proposed
- SOLAS regulation II-1/28 - *Means of going astern*
- Introduction of specific applications of the regulation as the current regulation will need to state that it applies to “traditional steering systems”
- SOLAS regulation II-1/29 - *Steering gear*
 - Introduction of specific applications of the regulation as the current regulation will need to state that it applies to “traditional steering systems”
- SOLAS regulation II-1/30 - Additional requirements for electric and electrohydraulic steering gear
 - Introduction of specific applications of the regulation as the current regulation will need to state that it applies to “traditional steering systems”
- SOLAS regulation II-1/42 - Emergency Source of Electrical Power in Passenger Ships
 - Minor amendments to references
- SOLAS regulation II-1/ 43 - Emergency Source of Electrical Power in Cargo Ships
 - Minor amendments to references
- SOLAS regulation V/25 – Operation of steering gear
 - It is proposed that ships fitted with multiple steering systems will need to have more than one steering system in operation when navigating in areas where navigation demands special caution.
- SOLAS regulation V/26 – Steering gear: Testing and drills
- Amendments to refer to steering gear rather than “rudders”, and the introduction of a requirement for ships' officers concerned with the operation and/or maintenance of steering gear to be familiar with the ship's manoeuvring characteristics

Discussion on possible development of related instruments highlighted the following:

1. Incorporating MSC.1/Circ.1536 – Unified Interpretation of SOLAS regulations II-1/29.3 and 29.4 into the development of the new regulations.
2. A.467(XII) – *Guidelines for acceptance of non-duplicated rudder actuators for tankers, chemical tankers and gas carriers of 10,000 tons gross tonnage and above but less than 100,000 tonnes deadweight*. It was agreed to defer the conclusion whether this resolution should be amended or not after new SOLAS regulations are fixed.
3. MSC.137(76) – *Standards for Ship Manoeuvrability*. Given that current SOLAS regulations II-1/28 and 29 would be retained for existing ships, resolution MSC.137 (76) should also be retained for those regulations. Consequently, it is expected that the IMO will develop a new instrument (e.g. a new MSC resolution) for new SOLAS regulations (II-1/28-1 and II-1/29-1) once they have been finalised.

4. MSC/Circ.1053 – *Explanatory Notes to the Standards for ship manoeuvrability*. The circular is applicable to existing ships that have to comply with SOLAS regulations II-1/28 and 29, and as such should be retained. Consequently, it is expected that the IMO will develop a new set of explanatory notes in parallel with the development of the new SOLAS regulations (II-1/28-1 and II-1/29-1).
5. A.601(15) – *Provision and Display of Manoeuvring Information on board Ships*. Given that current SOLAS regulations II-1/28 and 29 would be retained for existing ships, resolution A.601(15) should also be retained for those regulations. Consequently, it is expected that the IMO will develop a new instrument (e.g. a new MSC resolution) for new SOLAS regulations (II-1/28-1 and II-1/29-1) once they have been finalised.
6. MSC.64(67) - *Recommendation on performance standards for heading control systems*. SDC could not establish at this session whether or not this instrument needed amending or if a new instrument should instead be developed. Future sessions of SDC will continue the discussion.
7. Amendments to MSC.1/Circ.1212/Rev.2 - *Revised Guidelines on Alternative Design and Arrangements for SOLAS Chapters II-1 and III*. It was agreed that the expected performance of the new SOLAS regulations II-1/28-1 and 29-1 could be developed after finalisation of these new regulations and, if agreed, should be included in future amendments to MSC.1/Circ.1212/Rev.2.

It is expected that the draft amendments will apply to all new passenger ships and to all cargo ships of 500GT and above engaged in international voyages:

- for which the building contract is placed on or after 1 January 2032; or
- in the absence of a building contract, the keel of which is laid or which are at a similar stage of construction on or after 1 July 2032; or
- the delivery of which is on or after 1 January 2036.

Draft amendment to the 1988 Load Line Protocol, regulation 25, on the requirement for fitting guard rails or bulwarks on the deck structure

Draft amendments to Regulation 25 - *Protection of the Crew* introduce the need to install guard rails or bulwarks around all exposed sea access holes (such as the edges of moonpools) which are accessible to the crew during navigation. The height of the bulwarks or guard rails are to be at least 1m from the deck. If this height interferes with the normal operation of the ship, Administrations can approve a lower height. Additionally, where necessary for the normal operation of the ship, chains can be fitted between two fixed stanchions and/or bulwarks as a replacement to guard rails and are to be tightened as much as reasonably practicable and be detachable.

These changes are expected to impact all new ships of 24m or more in length that engage on international voyages, of which the keels are laid, or which are at a similar stage of construction on or after 1 January 2028.

Unified interpretations

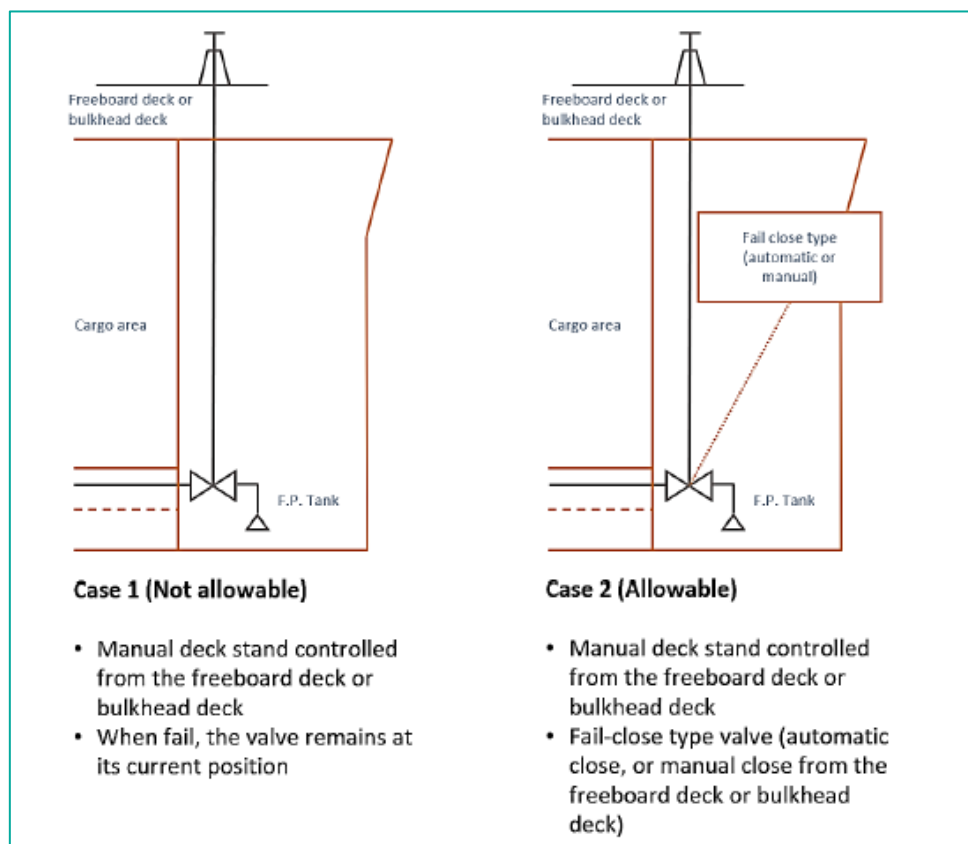
When regulations are unclear in their intent, a unified interpretation (UI) can be developed to clarify and help ensure consistent application.

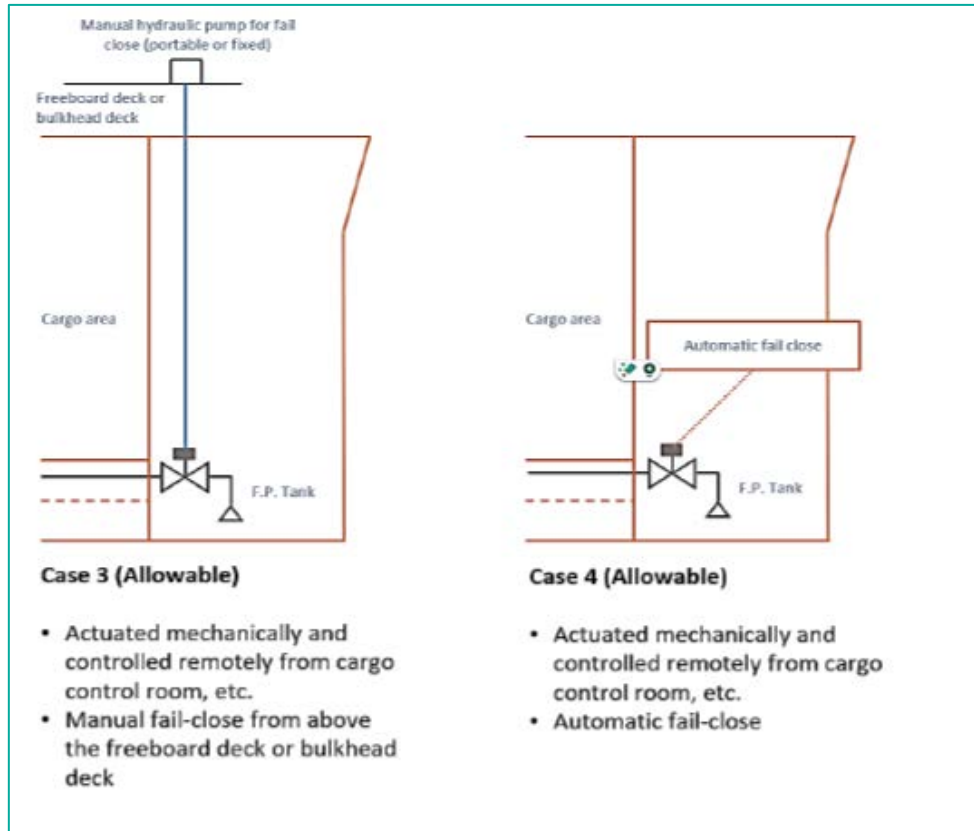
Draft unified interpretation of SOLAS regulation II-1/12.6.2 - Peak and Machinery Space Bulkheads, Shaft Tunnels, etc

A Unified Interpretation to clarify the term "remotely controlled valve" used in SOLAS regulation II-1/12.6.2, was agreed as follows:

1. For compliance with SOLAS regulation II-1/12.6.2 the valve fitted on the pipe piercing a ship's collision bulkhead below the bulkhead deck of passenger ships and the freeboard deck of cargo ships may be either a deck standing manual type or a mechanically powered type with a fail-close arrangement; and
2. For the purpose of the fail-close arrangement, the valve should be of an automatic fail-close type or should have an additional manual-closing function activated from a position above the bulkhead deck of passenger ships and the freeboard deck of cargo ships.

The following representations have been prepared by IACS and published in their (SDC 11/10/2) paper *Draft unified interpretation of SOLAS regulation II-1/12.6.2*.





Draft revision of MSC.1/Circ.1511/Rev.1 on the Unified interpretations of SOLAS regulations II-2/9 - Containment of fire and 13 - Means of escape

A draft UI has not been agreed to clarify that, when applying SOLAS II-2 – Regulation 13.4.1 (Means of escape on passenger ships) and 13.4.2 (Means of escape on cargo ships) the protected enclosure stretches from the lower part of the space to a safe position outside the space when it starts from the lowest deck level, **or** any working platform **or** passageway within the space up to 2.3m above the lowest deck level.

However, after extensive discussions, a majority of delegations agreed that the current version of the circular (MSC.1/Circ.1511/Rev.1) already permits, in practice, for the escape trunks to be located in various heights in the lower part and not just limited to the lowest level, in order to allow the most appropriate arrangement for safe evacuation. Administrations will need to decide and instruct ROs accordingly, taking into account specific ships and arrangements.

Further discussion on the interpretation will happen at III 11 with a potential development of a new guidance in the context of the harmonisation of PSC activities.

Draft guidelines for use of fibre-reinforced plastics (FRP) within ship structures

Driven by research and development projects' outcomes, the IMO is evaluating a revision of MSC.1/Circ.1574 – *Interim Guidelines for Use of Fibre Reinforced Plastic (FRP) Elements within Ship Structures - Fire safety issues*.

This work was initially expected to be finalised at this session, however, the complexity and range of discussions was noted and given that significant topics still require careful consideration, a correspondence group, reporting to SDC 12 (January 2026), has been tasked to further develop:

- Continue the review and draft updates to of MSC.1/Circ.1574;
- fire performance for non-load-bearing and load-bearing divisions and elements; and
- further guidance on recycling of FRP materials.

It was highlighted that Administrations will still be able to accept alternative design arrangements of composite structures without making use of the interim guidelines when applying SOLAS regulations II-2/17 (Alternative design and arrangements) or I/5 (Equivalents) if they so wish.

Further related additional work has also been identified which could require amendments to other IMO instruments (SOLAS chapter II-2 and 2010 FTP Code) however it was agreed that MSC will first need to agree to undertake the work as it currently is outside the scope of this work. Pending an MSC decision, any related amendments to the FTP Code are expected be discussed by the SSE sub-committee.

The target completion date has been moved to 2026 (SDC 12).

Review of A.1021(26) - Code on Alerts and Indicators, 2009

Since the adoption of the Code, many IMO instruments referenced within it have been revised. SDC 11 reviewed the Code to update it accordingly and to remove contradictions, ambiguities and unnecessary redundancies.

The update of the Code has now been finalised with the following notable amendments:

- Inclusion of the Exhaust Gas Cleaning Systems (EGCS) Guidelines (MEPC.340(77)) in the Code, and in particular a reference in table 10.1.4 - *Location: at the equipment or at the location being monitored*, since the EGCS Guidelines addressed monitoring systems which may be considered as indicators.
- Inclusion of the International Ship and Port Facility Security Code (ISPS Code) in the Code, and in particular a reference in tables 10.1.1 - *Location: navigation bridge* and 10.1.6 - *Location: miscellaneous*, to capture section 9.43 - *Monitoring the Security of the Ship* of the ISPS Code, which referred to an audible and/or visual alarm activated by automatic intrusion-detection devices.
- Inclusion of the Code for Approval of Ballast Water Management Systems (BWMS Code) (resolution MEPC.300(72)) in the Code, and in particular relevant references in table 10.1.8 - *Location: not indicated by IMO instruments*, and to delete the references to the resolutions on sediment monitoring and self-monitoring related to the BWM Convention.
- The diving bell and hyperbaric survival craft (HBSC), O₂ and CO₂ level monitor requirements from the 2023 Diving Code have been moved from table 10.1.6 - *Location: miscellaneous* to table 10.1.4 - *Location: at the equipment or at the location being monitored*.

It is expected that MSC 110 will approve the draft Assembly resolution.

Experience building phase (EBP) for the reduction of underwater radiated noise from shipping

Concern has been raised that a significant portion of the underwater noise generated by human activity may be related to commercial shipping. The international community recognises that underwater-radiated noise (URN) from commercial ships may have both short and long-term negative consequences on marine life, especially on marine mammals.

In support of the above, MEPC 82 (see LR's [Summary Report for MEPC 82](#)) approved MEPC.1/Circ.906/Rev.1 - *Revised guidelines for the reduction of underwater radiated noise from shipping to address adverse impacts on marine life*. In conjunction, the IMO has additionally agreed to an Experience Building Phase (EBP) where the industry is encouraged to apply the revised Guidelines and submit findings.

The IMO is then expected to assess the outcomes of the EBP at MEPC 85 (2026) to decide on further actions. SDC 11 has agreed to establish a correspondence group with the following main objectives:

- develop a framework to assess the progress made on the application and uptake of the revised guidelines;
- review technical objectives of the action plan and development of next steps;
- select studies, discuss knowledge gaps and integrate results in the EBP.

Member States and a number of International Associations have reiterated the importance of applying the circular in the lead up to the next session as results of the progress and discussion will need to be submitted to SDC 12 (January 2026). SDC 12 is also expected to discuss if the EBP should be extended by 2 years.

Please click below for further information related to managing underwater radiated noise.



Regulatory Affairs

Lloyd's Register Global Technology Centre,
Hampshire House
Hampshire Corporate Park, Southampton
SO53 3RY, UK

Lloyd's Register EMEA

e: RegulatoryAffairs@lr.org

w: www.lr.org/imo

To find previous material and to register to receive regular updates on IMO meetings and developments, please visit <https://www.lr.org/imo>

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.

Lloyd's Register and variants of it are trading names of Lloyd's Register Group Limited, its subsidiaries and affiliates. Copyright © 2025 Lloyd's Register EMEA (Reg. no. 29592R) is a registered society under the Co-operative and Community Benefit Societies Act 2014 in England and Wales. Registered office; 71 Fenchurch Street, London, EC3M 4BS, UK. A member of the Lloyd's Register group.

Lloyd's Register Group Limited, its subsidiaries and affiliates and their respective officers, employees or agents are, individually and collectively, referred to in this clause as 'Lloyd's Register'. Lloyd's Register assumes no responsibility and shall not be liable to any person for any loss, damage or expense caused by reliance on the information or advice in this document or howsoever provided, unless that person has signed a contract with the relevant Lloyd's Register entity for the provision of this information or advice and in that case any responsibility or liability is exclusively on the terms and conditions set out in that contract.

