

IMO III 10 Meeting summary

August 8, 2024



The 10th session of the IMO's Sub-Committee on Implementation of IMO Instruments (III 10) was held 22-26 July 2024 in the IMO headquarters in London, supplemented by hybrid (online) participation.

LISCR participated in the following groups in addition to the plenary.

ID	Subject
WG 1	Working group on Analysis of marine safety investigation reports
WG 2	Working group on Measures to harmonize port State control activities and procedures worldwide, and validated model training courses
WG 3	Working group on Survey Guidelines under the HSSC, the Non-exhaustive list of obligations, and the Guidance on remote survey, audit and verification, and others
DG 1	Drafting group on Analysis of consolidated audit summary reports

Reception facility

IMO Global Integrated Shipping Information System (GISIS) report

III 10 recalled that the format for reporting alleged inadequacies of port reception facilities (PRFs) is outlined in Appendix 1 of the *Consolidated Guidance for Port Reception Facility Providers and Users* (MEPC.1/Circ.834/Rev.1). Reports of inadequacies are submitted through a dedicated module in GISIS. Flag States should directly enter their cases into GISIS, after which the concerned port State receives a notification of the alleged inadequacy.

Recognizing the importance of timely reporting of alleged inadequacies of PRFs to the IMO, III 10 highlighted the necessity of accurate reporting to effectively address existing problems. III 10 also emphasized the need to improve communication between flag States and port States during all port operations. Additionally, III 10 stressed the importance of Member States continuing to notify GISIS about PRF failures.

Casualty analysis

IMO casualty database and reporting rate

The IMO maintains a database of casualty records reported by Member States in the GISIS. III 10 noted that the reporting rate was 73.6% and invited Member States to submit reports through GISIS.

Lessons learned from marine casualty case studies

III 10 prepared 34 cases and finalized them for release in the IMO Public website (<https://www.imo.org/en/OurWork/MSAS/Pages/Casualties.aspx>).

Collision with fishing vessel

III 10 prepared a draft MSC circular on *Recommendations to national Administrations to prevent collisions with fishing vessel*, which invites national Administrations to recommend carriage and use of AIS and VHF by domestic fishing vessels.

Data analysis of marine casualties and incidents

The Working Group on Analysis of marine safety investigation reports (WG) was tasked with supporting the IMO's data-driven decision-making process. This approach, identified during III 9 (July 2023), aims to link casualty investigation findings with the IMO's work programme. The Correspondence Group (CG) established by III 9 developed key principles and a flow chart for this process. Following the deliberation at the WG, III 10 approved the CG's work and submitted it to the 109th session of the Maritime Safety Committee (MSC 109) for final approval.

Port State Control (PSC)

PSC Procedure

The III Sub-Committee has been working on the revision of the *Procedures for Port State Control, 2023*, for adoption by the 34th IMO Assembly scheduled for December 2025. The current work includes new requirements entering into force since the last version.

In addition, III 10 addressed the following:

- **Structure of the procedure:** III agreed to avoid duplication and inconsistencies and agreed that all detainable deficiencies should be listed in Appendix 2.
- **Maritime Security:** III 10 agreed to develop a new appendix on Port State Control (PSC) related to security matters, based on the existing appendix on the ISM Code. This decision was made instead of working on resolution MSC.159(78), which provides interim guidance on control and compliance measures to enhance maritime security. The latter was deemed too broad in scope for their current needs;
- **Verification of alternative design arrangements:** There was a submission that a port State control officer (PSCO) should verify the result of risk assessment approved by the flag Administration in relation to SOLAS regulations II-1/55 and II-1/56, including the verification of the IGF Code certification. III 10 concluded that while the submission identified some significant issues concerning potential challenges in applying the GBS approach to the development of IMO instruments, but not directly related to PSC activities, and no further action was required at this stage.
- **STCW rest hours records:** At III 10, particular attention was paid to the case when a ship does not have records of daily hours of rest despite the requirements of the STCW Convention. While some delegations suggested recording the matter as an ISM Code-related deficiency, III 10 agreed to take no further actions at this stage regarding the deficiency in question and brought this matter to the attention of the HTW Sub-committee in relation to the application of Article X and Regulation I/4 of STCW Convention.

The CG would continue updating the procedure toward III 11 scheduled for July 2025.

PSC activities

III 10 reviewed various Port State Control (PSC) activity reports and observed the following trends:

- In 2021, there were 74,574 inspections and 1,746 detentions.
- In 2022, inspections increased to 81,361 with 2,173 detentions.
- In 2023, inspections rose to 88,658, and detentions increased to 2,802.

As a result, the overall detention rate grew from 2.67% in 2022 to 3.16% in 2023.

Harmonized System of Survey and Certification (HSSC) Guidelines

The IMO regularly update its survey checklist called *the Harmonized System of Survey and Certification (HSSC)*.

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

The III Sub-Committee has been updating resolution A.1186(33) on *the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2023*.

In addition to the regular updates of the new requirements entering into force between 1 January 2024 and 31 December 2025 (inclusive), the current work includes:

- Identification and possible removal of survey requirements that are related to non-mandatory instruments;
- Removal of footnotes that are quoted in the relevant the mandatory requirements;
- Particular attention to the survey requirements relating to *the International Code of Safety for Ships Carrying Industrial Personnel (IP Code)*, which entered into force on 1 July 2024; and
- Review of existing survey items for the examination of statutory certificates that are not relevant to the convention for which the survey is conducted.

III 10 set up the CG to continue the work.

Guidance for remote survey, ISM audit and ISPS verification

The IMO's 34th Assembly adopted A.1186(33) on *Survey guidelines under the Harmonized System of Survey and Certification (HSSC), 2023* and A.1188(33) on *2023 Guidelines on implementation of the International Safety Management (ISM) Code by Administrations*, which address remote survey/audit respectively.

The WG established during the session further worked on the draft MSC-MEPC circular on the guidelines.

- **PSC issues:** One issue emerged was verification survey (additional survey/audit) for verifying the rectification of a deficiency identified by the port State control official. III 10 agreed that the scope and degree of additional survey/audit should be decided by the flag Administration and deferred the matter to the CG for the development of a concrete text.
- **Technical requirements:** Further, III 10 recognized the need to develop technical requirements for remote survey/audit/verification and tasked the matter to the CG.

- **ISM Company audit:** III 10 agreed that interim ISM audits should be conducted in person, except for interim Document of Compliance (DOC) company audits when a new ship type is to be added to an existing DOC.
- **ISPS verification:** Regarding ISPS remote verification, III 10 agreed that the draft guidance should restrict the use of remote verification to extraordinary circumstances only, rather than replacing in-person attendance.
- **Remote survey/audit eligibility list:** The CG will continuously develop the eligibility list/code for the remote survey/audit/inspection.

Further information

For further information please contact: imo@liscr.com

Annex

Provisional list of draft resolutions, circulars and other output

- Draft text of lessons learned from marine casualties
- Draft MSC circular on Recommendations to national Administrations to prevent collisions with fishing vessels
- III Circular on the quality of the casualty investigation report