

SUMMARY REPORT

IMPLEMENTATION OF IMO INSTRUMENTS SUB-COMMITTEE

12th session

July 2026



EXECUTIVE SUMMARY

The 12th session of the Implementation of IMO Instruments Sub-Committee (III 12) was held in person in London (20–24 July 2026) with hybrid facilities enabling remote participation.

The Sub-Committee approved several reports regarding Port Reception Facilities (item 3), Analysis of consolidated audits summary reports (item 9), and **63 lessons learned from casualties** (item 4). From these lessons, several risks were identified: incidents involving ruptured high-pressure cylinders (to be disseminated via III 3 circular), fire standards for cargo handling spaces of specialized self-unloading bulk carriers, and risks associated with wearing inflatable lifejackets. These two findings will be submitted to MSC 112 as new outputs.

The Sub-Committee initiated a comprehensive review of the **Casualties Investigation Code** and associated guidelines (item 5), recognizing the need for improvement in timeliness and quality. It also commenced the revision of **Guidelines implementing the IMS Code** (item 12).

III 12 undertook the periodic review of **Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2025** (item 10) and **Procedures for Port State Control** (item 6). Apart from integrating recent amendments into the lists, the Sub-Committee forwarded the work to correspondence groups for further development. The next session of the Assembly (Assembly 35) scheduled for December 2027, will adopt the consolidated outputs. The relaxed timeline enabled delegates to discuss preliminary improvements to PSC procedures—specifically the qualification of Port State Control Officers (PSCOs) and guidance on machinery and maintenance—as well as enhancements to HSSC Guidelines, including new tables and incorporation of new instruments.

The Sub-Committee agreed on **draft revised guidelines for the seaworthiness and safety inspection of small fishing vessels** and safety inspection checklists for small fishing vessels, with a view to approval by MSC 112 and subsequent dissemination as a joint publication by FAO and IMO (item 14).

The Sub-Committee also discussed the Revised Recommendations for Entering Enclosed Spaces Aboard Ships (MSC.581(110)) and systematic monitoring of CO₂ (item 13). Delegates expressed the need for a risk-based approach to these matters and were invited to submit amendments to the guidelines at the next MSC session.

Decisions of other IMO bodies (Item 2)

After considering the decisions of other IMO bodies (MSC 111, MEPC 84, NCSR 12, TC 75, C 134, CCC 11, A 34, SDC 12, PPR 13, HTW 12, SSE 12, FAL 50, and LEG 113), III 12 delved into specific items in accordance with the agenda adopted in plenary.

Consideration and analysis of reports on alleged inadequacy of port reception facilities (Item 3)

The Sub-Committee **noted** the report of inadequacy of port reception facilities (PRF) for the years 2024 and 2025, in accordance with the requirements of the MARPOL Convention. 13 cases were reported by four States (9 out of 13 by Marshall Islands): the response rate amounted to 38% (5 responses out of 13 reports). Absence of facilities (the primary issue), inconvenient location and unreasonable tariffs were identified as issues. Six reports mentioned MARPOL Annex I (oily waste) and seven reports pointed MARPOL Annex V (garbage).

A significant decline in the number of reports (-55%), as well as in the response rate of port States (from 79% to 38%) was reported. Investigations reveal a common theme: communication and procedural issues (absence of waste discharge requests submitted by vessels to port authorities, failure to update estimated time of arrival, lack of coordination between vessels, agents, and facilities). The decline in response rate raises concerns about the commitment of port States in following up on reports of PRF inadequacy.

The Sub-Committee urged States to strengthen mandatory reporting via the PRF module in GISIS system and recommended to Improve data management for better identification of PRF implementation issues

Lessons learned and safety issues identified from the analysis of marine safety investigation reports (Item 4)

Lessons learned from marine casualties

The initial report compiles 70 marine casualty investigations highlighting critical safety failures across maritime operations. 63 lessons were identified with key recurring themes including inadequate risk assessments, non-compliance with Safety Management Systems (SMS), and ineffective crew training.

Occupational accidents dominate, particularly falls from height and enclosed space entry incidents. Navigation collisions stem from poor lookout practices and inadequate bridge resource management. Equipment failures result from insufficient maintenance and inspection protocols. Communication breakdowns between crew members and departments consistently contribute to accidents. Fire and explosion hazards arise from improper cargo handling and lack of hazard awareness. Weather-related groundings occur when masters ignore forecasts or fail to seek shelter.

The report emphasizes the need for strict adherence to permits-to-work, proper use of personal protective equipment, and implementation of stop-work authority. Effective supervision, comprehensive training, and a strong safety culture are essential for preventing marine casualties. These lessons benefit seafarers, ship operators, managers, regulators, and maritime training institutions globally.

III 12 confirmed the draft containing 63 lessons learned from marine casualties, with a view to dissemination as a III.3 circular and release on the IMO public web-site.

Further analysis of incidents of ruptured portable fire extinguishers

The Casualty Analysis Correspondence Group investigated 20 incidents involving ruptures of high-pressure cylinders (portable fire extinguishers, lifeboat systems, and breathing apparatus). Corrosion was identified as the primary contributing factor in 14 cases, with overpressure and other causes in the remaining incidents. The analysis revealed critical deficiencies in inspection and record-keeping practices by crew members, flag states, and service providers. No design or material standard deficiencies were found in the cylinders themselves. The investigation highlighted that high-pressure cylinders pose significant risks due to stored energy and have defined service lifespans requiring strict tracking. A proposed IMO Circular recommends enhanced inspection procedures, including examination under rubber footings and removal of cylinders for complete visual inspection. The document emphasizes that no international standard currently exists for high-pressure cylinder inspection, and inadequate maintenance protocols remain a systemic issue across maritime operations.

III 12 approved the proposed III.3 circular. to disseminate these conclusions.

Fire safety standards for cargo handling spaces of specialized self-unloading bulk carriers,

Specialized self-unloading (SUL) bulk carriers lack adequate fire safety regulations for cargo handling spaces, creating very high fire risk despite meeting existing standards. Multiple major fires on SUL carriers (Iron Chieftain, Ambassador, Yeoman Bontrup) over 25 years revealed systemic safety gaps that existing SOLAS regulations failed to prevent. Current regulations lack standards for conveyor belt flammability, mandatory fire detection systems, and fixed fire-extinguishing systems specific to SUL spaces. SUL systems create large, undivided compartments with interconnected spaces that cannot be effectively sealed, complicating fire containment and suppression.

It seems necessary to amend SOLAS Chapter II-2 Regulation 10.7.1.4 to remove exemptions for SUL bulk carriers and mandate improved fire detection and suppression systems.

It will require flammability standards for conveyor belt rubber, installation of automated fire detection systems, and fixed fire-extinguishing systems (e.g., water mist systems). Proven technology exists; ship operators have already voluntarily installed thermal imaging, heat detection systems, and Hi-Fog suppression systems successfully.

III 12 finalized the proposal for a new output with a view to consideration by MSC 112 (with work to be assigned to the SSE Sub-Committee)

New output to address risks involved with wearing inflatable lifejackets

This document proposes amendments to international maritime safety regulations to address risks associated with wearing inflatable lifejackets, specifically the inability to remove or deflate them in emergency situations. In 2022, the New Zealand domestic ferry **I-Catcher** capsized after a hull impact. While six occupants escaped by climbing onto the upturned hull, five passengers trapped in an air pocket beneath the hull were found deceased—all wearing inflated lifejackets that prevented their escape. This incident revealed a critical safety gap.

Lifejackets are vital safety equipment, but users must understand how to safely deflate and remove them underwater in emergencies. Current standards (ISO 12402) lack mandatory doffing and deflation instructions. Pre-departure safety briefings do not include deflation procedures. Similar fatalities have occurred in other maritime incidents (4 additional cases documented from 2007-2020).



The document recommends amendments to two IMO instruments:

1. MSC.48(66) International Life-Saving Appliance (LSA) Code
 - require lifejackets to be marked with doffing and deflation instructions;
 - include warnings about inflation hazards when obstructed overhead;
2. MSC.518(105) Model Regulations on Domestic Ferry Safety
 - mandate doffing and deflation demonstrations in pre-departure safety briefings.

III 12 finalized the proposal for a new output with a view to consideration by MSC 112 (with work to be assigned to the SSE Sub-Committee).

Quality of marine safety investigation reports

Nine marine safety investigation reports were evaluated, with quality forms completed in 100% of cases. Only 34 reports (58%) met the established quality criteria from the Casualty Investigation Code; 25 reports (42%) contained inadequate or missing information. Deficiencies included missing identity details of flag States/operators (6 reports), insufficient crew/work routine descriptions (7 reports), and weak causal analysis (8 reports). GISIS appendix completion was inconsistent: Generic information (48/59), Factual information (43/59), Casualty analysis (36/59), and Supplementary information (6/59). Quality varied widely—some reports showed shortcomings in safety issue identification and depth of human factors analysis, while others received praise for thoroughness and comprehensive documentation.

III 12 approved a relevant III 3 circular.

III 12 confirmed the findings of the correspondence group based on the analysis of individual marine safety investigation reports and GISIS, for approval and authorization of their release to the public on GISIS

IMO Maritime Casualty Analysis

This analysis of 59 maritime casualty investigations submitted to the International Maritime Organization reveals critical safety vulnerabilities across the global shipping industry. The most prevalent incident types include occupational accidents (falls, struck-by incidents, electrocution) accounting for 15 cases, fires and explosions (10 cases), collisions (8 cases), enclosed space incidents (5 cases), and grounding or sinking (4 cases).

Four interconnected failure domains emerge as root causes. **Human factors and safety culture** deficiencies dominate, characterized by inadequate risk assessments, poor bridge-to-crew communication, fatigue from non-compliance with rest hour regulations, normalization of unsafe practices, and insufficient supervision during high-risk work. **Procedural failures** compound these issues through inconsistent Safety Management System implementation, ineffective toolbox meetings, inadequate crew training and familiarization, and incomplete handovers during watch changes. **Technical and design shortcomings** contribute significantly, including equipment maintenance failures (valves, pumps, cylinders), poorly designed work spaces lacking adequate safety barriers, cargo securing deficiencies, and electrical system hazards from portable equipment. **Operational gaps** in navigation and watchkeeping—such as inadequate lookout practices, failure to utilize available navigational aids (radar, ECDIS, AIS), COLREGs non-compliance, and poor pilotage coordination—further elevate collision and grounding risks.

The IMO recommends strengthening SMS implementation through rigorous auditing, enhancing crew training in collision avoidance and emergency procedures, improving equipment maintenance and inspection protocols, establishing effective communication systems, promoting a proactive safety culture with crew stop-work authority, and addressing fatigue through rigorous work/rest compliance. These findings underscore that maritime safety improvements require simultaneous attention to human, procedural, technical, and operational dimensions.

MV Dali, Baltimore

The working group further considered the lessons learned and safety issues raised from marine casualties, especially the case of VM Dali in Baltimore: an investigation of the casualty was conducted by the United States National Transportation Safety Board (NTSB) and the results were published in their report, MIR-25-40, dated 18 November 2025. Among the recommendations contained in the investigation is identification that the ISM Code could be improved by shifting towards a predictive approach versus reactive such that safety issues are addressed and corrected before they occur.

The Sub-Committee noted the discussion and to instruct the correspondence group to review the submission as part of the Casualty Analysis Process, bearing in mind that the result of its works may support the ongoing work on the review of the ISM implementation Guidelines (item 12).

Review of the casualty investigation code and the associated implementation guidelines (Resolution A.1075(28)) (Item 5)

The Sub-Committee initiated the review of the Casualty Investigation Code and the associated implementation Guidelines (resolution A.1075(28)), with a targeted completion year of 2028 focusing mainly on addressing the quality and timeliness of investigations and reports.

Starting discussions focused on the principles of investigation (mandatory requirements or flexibility), timeliness and reporting burdens, application to non-SOLAS ships, definitional ambiguities (“total loss”/“loss”), the use of investigative evidence in judicial proceedings, standardization of notification format.

A correspondence Group was instructed to review the Casualty Investigation Code and the associated implementation Guidelines and Member States were encouraged to nominate their experts to participate.

Measures to harmonize port State control (PSC) activities and procedures worldwide (Item 6)

The Sub-Committee initiated two workstreams which will be carried out till the next session in 2027.

Guidelines for port State control officers on enhanced machinery and maintenance inspections,

These guidelines should be included as a new appendix to the *Procedures for port State control, 2025* (resolution A.1206(34)). Several facts indicated the need to strengthen inspection regime according to the report based on 97 incidents:

- rising machinery failures: Machinery damage/failure accounts for over 50% of global shipping incidents (1,860 in 2024);
- increased detentions: In the Tokyo MoU region, detentions for maintenance issues jumped from 725 in 2022 to 1,334 in 2023;
- safety concerns: Lack of planned maintenance significantly impacts vessel safety, crew safety, and environmental protection;
- inspection challenges: PSCOs lack comprehensive technical guidelines for in-depth machinery inspections despite complex and scattered regulatory requirements.

Several root causes were identified: non-compliance with Planned Maintenance Systems, equipment wear and aging, improper crew operation, failure in routine maintenance tasks (e.g., cooling water quality testing), main engines account for 75% of failures.

The draft guidelines, whose current presentation can be characterized more as training material than operational guidance, require full review against SOLAS 1974 requirement and the 2025 Port State Control Procedures format (relating to identification of detainable deficiencies).

An established correspondence group will develop the project which should be finalized at III 13.

Qualifications of PSC officers

It considered how to introduce more flexibility in the qualifications of PSC officers (section 1.9.1. of IMO *Procedures for Port State Control, 2025*) taking into account several issues (specialized areas such as biofouling and ballast water management, smaller maritime Administrations with limited resources...). Several proposals were discussed to guarantee that PSCO should be an experienced officer, trained to a standard at least equivalent to that of a flag State surveyor. The same correspondence group will further develop the relevant answer (finalization expected at III 13).

III 12 updated the list of instruments relevant to port State control procedures, set out in appendix 21 to the *Procedures for port State control, 2025* (resolution A.1206(34)), to reflect new requirements relevant to PSC activities. The completion of the full set of amendments to the Procedures is scheduled at the next session.

Development of an entrant training manual for PSC personnel (item 7)

III 12 agreed to a draft framework which will be used as a basis for the development of the entrant training manual for PSC personnel, and subsequently the functions and requirements of the key modules. The training manual should be developed specifically for PSCOs, include the reference to the MLC 2006 and avoid several duplications and overlapping.

Due to the complexity of the works, the Chinese delegation will develop the manual with a view to submitting it to III 13 (no intersessional correspondence group).

Identified issues relating to the implementation of IMO instruments from the analysis of data (item 8)

The Sub-Committee reviewed progress on the GISIS (Global Integrated Shipping Information System) enhancement project.

The project entered the Phase 2, part 1 with the development of a new analytical data model, power BI integration for enhanced analytics, centralized alerting and messaging system and AI-powered chatbot for GISIS and IMODOC. The second part is planned: modernization and standardization of the user interface, improvements in data-entry compliance.

GISIS is being modernized with advanced analytics and AI capabilities, but success depends on Member States providing timely, complete, and accurate data submissions.

Analysis of nine consolidated audit summary reports (CASRs) under the IMO Member State Audit Scheme (IMSAS) (Item 9)

The Drafting Group finalized the Analysis of Consolidated Audit Summary Reports with a view to developing appropriate recommendations to the Committees.

Scope: Analysis of 112 IMO Member State audits (2016-2024) under the IMSAS scheme using the III Code as the audit standard, covering nine Consolidated Audit Summary Reports.

Five Major Recurrent Finding Areas: Implementation, enforcement, improvement, strategy, and delegation of authority—with implementation and enforcement accounting for the largest share of shortcomings across flag, coastal, and port State activities.

Critical Implementation Gaps: Most frequent violations involve SOLAS 1974 Article I (general obligations), MARPOL Article 1, and STCW 1978 communication requirements, indicating absent or inadequate national legislation transposing IMO instruments.

Root Cause Categories: Four main causes identified : management (33.3% resource gaps), policies/procedures (60.1% lack of policies), legislation (54.5% absent national provisions), and implementation (47.5% technical capability deficits).

Enforcement Deficiencies: 52% of enforcement shortcomings stem from absent enforcement measures; 17.4% from ineffective control and monitoring programmes; 14.2% from lack of qualified personnel and training.

Technical Assistance Needs: Member States require targeted support in communication mechanisms, SOLAS regulation XI-1/5 (CSR), and STCW 1978 regulation VIII/1 (fitness for duty), to be addressed through the 2026-2027 ITCP biennium.

Provisions Under Review: STCW 1978 Regulation VIII/1 assessed but does not meet criteria for formal review; however, referred to Technical Cooperation Committee for awareness-raising and targeted assistance.

Tracking and Accountability: Comprehensive tracking log maintained for all recommended provisions and subsequent actions by responsible IMO bodies; cumulative data since III 5 consolidated for monitoring progress.

The Sub-Committee encourages Member States to use audit analysis and MSC-MEPC.2/Circ.19 guidance to self-assess maritime administrations and prepare for future audits.

Nine CASRs outcomes shall be reported to the Council, with recommendations for continued CASR analysis using established consolidated methodology for future audit cycles.

III 12 also agreed on the establishment of a correspondence group and its terms of reference for the development of guidelines addressing the implementation of provisions left "to the satisfaction of the Administration" or equivalent, in the relevant mandatory IMO instruments.

Updated survey guidelines under the harmonized system of survey and certification (HSSC) (Item 10)

BACKGROUND

To facilitate the harmonized, consistent and timely global implementation of the IMO instruments and provide guidance to the work in relation to the Survey and certification, IMO Assembly 34 adopted the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2025 (resolution A.1207(34)). As the updating of Survey Guidelines under the HSSC is usually tasked to a continuous correspondence/working/drafting group under the III Sub-Committee, taking into account the amendments to the mandatory IMO instruments entering into force up to and including 31 December 2025. The updated version of the Survey Guidelines under the HSSC is adopted, as appropriate, by the Assembly every two years. Last year, the Guidelines incorporated IP Code and certificates and records from other Conventions.

The Working Group on Survey Guidelines under the HSSC finalized the draft amendments to the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2025 (resolution A.1207(34)) deriving from the amendments to the relevant mandatory IMO instruments entering into force up to and including 31 December 2027, with a view to submission, in a consolidated form, to A 35 for adoption.

It incorporated survey items for pilot transfer arrangements (SOLAS V/23) in Annex 1 – Survey Guidelines under the 1974 Solas Convention, as Modified by the 1988 Protocol Relating Thereto – (E) 1 Guidelines for Surveys for the Cargo Ship Safety Equipment Certificate.

It finalized draft amendments to MSC/Circ.1140-MEPC/Circ.424, together with an associated draft MSC-MEPC circular, with a view to concurrent approval by MSC 112 and MEPC 85, and advise on whether the broader legal implication of stateless or abandoned ships should be referred to the Legal Committee,

A tabular format of a new column in the Survey Guidelines was submitted as the best way forward for development of the coding system to be embedded in the Survey Guidelines under the HSSC to indicate eligibility of remote survey for each survey item, (initial item-level coding exercise undertaken).

It elaborated draft amendments to List of certificates and documents required to be carried on board ships, 2022 (FAL.2/Circ.133-MEPC.1/Circ.902-MSC.1/Circ.1646-LEG.2/Circ.4), including the *Guidelines for the carriage and use of electronic nautical publications (ENP) system* (MSC.1/Circ.1705) under the nautical charts and publications, and the MASS Safety Certificate based on resolution MSC.595(111) in the list with a view to concurrent approval by MEPC 85, MSC 112, LEG 114 and FAL 51.

It started to develop survey guidelines for the Hong Kong Convention, taking into account resolution MEPC.222(64), with a view to incorporation into the Survey Guidelines under the HSSC and finalization at III 13 : a correspondence group was tasked for.

It recognized the need to further consider the need to amend the Survey Guidelines under the HSSC in the context of the revised Explanatory Notes (MSC.1/Circ.1369/Rev.1) to ensure harmonized and uniform implementation of the SOLAS regulations for safe return to port: a correspondence group was tasked to assess the necessity of the amendments.

Draft terms of reference were prepared for a correspondence group according to the conclusions of the Working group.

Non-exhaustive list of obligations under instruments relevant to the IMO Instruments Implementation Code (III Code) (Item 11)

III 12 reviewed and continued to develop draft amendments to the 2025 Non-exhaustive list of obligations (NEL), with a view to finalization at III 13 and subsequent adoption at A 35, emanating from those amendments to the relevant IMO instruments which will enter into force up to and including 1 July 2028.

Comprehensive revision of the Guidelines on the implementation of the ISM Code by Administrations and companies (Item 12)

III 12 further considered documents with a view to preparing draft amendments to resolution A.1188(33) containing the 2023 Guidelines on the Implementation of ISM Code by Administrations and draft amendments to MSC-MEPC.7/Circ.8 (Revised Guidelines for the Operational Implementation of the International Safety Management (ISM) Code by Companies). Several issues requiring amendment were identified, taking into account the need to avoid duplications (with III Code, RO Code, and ISM Code), preserve a goal-based approach as regards digital safety management systems, and maintain the highest level of Safety management.

A roadmap with a scoping exercise and gap analysis of the related documents will guide amendments according to the terms of reference and indicative timeline (see the table in the Appendix).

The work will continue intersessionally according to the terms of reference for a correspondence group.

Unified interpretation of provisions of IMO safety, security, environment, facilitation, liability and compensation-related conventions (Item 13)

A unified interpretation (UI) for applying IMO Resolution MSC.581(110) was proposed to address enclosed space entry procedures on tanker vessels.

Recognizing that Resolution MSC.581(110) must account for each ship type's operational characteristics and specific hazard profiles, and acknowledging that no universal, one-size-fits-all approach is appropriate, the proposal advocates for a risk-based approach. For oil tankers, chemical tankers, and liquefied gas carriers, enclosed space entry procedures should be grounded in recognized industry guidelines and address the actual hazards present: oxygen deficiency, flammable vapors, and toxic gases. CO₂ monitoring requirements should apply only when CO₂ presents a demonstrable operational risk. However, for tanker cargo spaces, CO₂ is not a characteristic hazard.

Consequently, the absence of CO₂ monitoring on properly ventilated tankers should not be cited as a deficiency, provided that risk-based procedures comprehensively address relevant hazards, and control measures adequately cover oxygen deficiency, flammable vapors, and toxic gases. Port State control officers should apply Resolution MSC.581(110) in a manner that is proportionate, risk-based, and appropriate to the specific ship type under inspection.

The Sub-Committee recalled IMO procedures (paragraph 5.11), which stipulate that unified interpretations should be developed only against mandatory requirements and should be avoided for recommendations—such as Resolution MSC.581(110). Given the divergence of views and the need for authoritative clarification, the Sub-Committee invited delegates to submit a revised proposal to the Maritime Safety Committee (MSC) to amend the applicable guidelines, where necessary.

Cooperate with the United Nations on matters of mutual interest, as well as provide relevant input/guidance - Review the draft guidelines for the seaworthiness and safety inspection of small fishing vessels and associated inspection checklist (item 14)

The expert group on Fishing Vessels, taking into account the comments made and decisions taken in plenary, was instructed to review the draft Guidelines for the seaworthiness and safety inspection of small fishing vessels and the associated inspection checklists. FAO shared a draft practical guidance for inspecting small fishing vessels to ensure seaworthiness and safety, facilitating insurance access for small-scale fishers worldwide. The objectives are to:

- Enable insurance services for small fishing vessels, especially in developing countries
- Provide practical inspection methods for vessel safety and seaworthiness
- Reduce accidents and fatalities in small-scale fisheries
- Increase safety awareness among vessel owners

It identified key inspection areas :



- **Structural Integrity:** Hull condition assessment across multiple materials (fiberglass, wood, steel, aluminum, HDPE), checking for damage, corrosion, and watertight integrity.
- **Stability:** Critical for preventing capsizing through physical tests (FAO heel test, offset load test, flooded stability tests) and assessment of loading, freeboard, center of gravity, and buoyancy.
- **Safety Equipment:** Life-saving appliances, fire-fighting equipment, navigation/communication devices, and emergency grab bags.
- **Machinery & Electrical Systems:** Engine functionality, fuel systems, cooling systems, propulsion, steering, and electrical installations.

The guidelines include inspection checklists for different vessel types, stability test procedures and forms, and tools for capacity building among maritime authorities, insurers, and fishing communities.

The working group finalized the draft guidelines for the seaworthiness and safety inspection of small fishing vessels and safety inspection checklists for small fishing vessels, for improving their clarity with non-substantive modifications, for approval by MSC 112, and subsequent dissemination as a joint publication by FAO and IMO.

Appendix

Roadmap for comprehensive review of the ISM Implementation Guidelines

Draft Time Frame and Actions

DEADLINE	ACTION TO BE TAKEN
Date: Due date for submission of report from CG	Establish principles and objectives for the comprehensive review, such as: • Uniform applications • Uniform conduct of audits • Do not introduce new prescriptive requirements • No duplication of other IMO instruments • Verification based on international and national rules and regulations and recommended guidelines • Review other ISM Code is not intended
Date: Due date for submission of report from CG	Identify areas for considerations, based on the documents listed in the TOR for the WG at III 12, such as: • Handling of company structures/organsiations during company audits (fragmented, virtual, corporate) • Strengthen the role of Designated Person Ashore • Usability and applicability of safety management system • Risk management / risk assessment • Corrective action plans • Time frame for internal audits • Digital safety management system, including the use of data for improvement (predictive safety management) Analyse and discuss the identified areas, and establish possible solutions
III 13 (2027)	Consideration of potential additional topics may be identified through submissions to III 12 Including the report from the CG
Due date for submission of CG's report	Develop draft text for the for the Guidelines and Administrations and for the companies based on the outcome of III 13
III 14 (2028)	Finalize the draft text for the Guidelines for Administration and Companies



This summary report has been prepared on the closing day of the Sub-Committee meeting, based on IMO Working papers and Plenary comments. Resolutions, Circulars and other IMO reference may be rectified on publication of final versions by the IMO Secretariat.

FOR MORE INFORMATION

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